

Planning Team
Epping Forest District Council
Forward Planning
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Our ref: NE/2019/129804/01-L01

Date: 5 February 2019

Dear Planning Team

Moreton, Bobbingworth and the Lavers Neighbourhood Plan

Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for Moreton, Bobbingworth and the Lavers. We aim to reduce flood risk, while protecting and enhancing the water environment.

Together with Natural England, English Heritage and the Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into neighbourhood plans.

This is available at:

<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Flood Zone 2 & 3

Your plan includes site allocations which are located in areas of *flood zone 2 and 3*.

In accordance with the National Planning Policy Framework (NPPF) para 155-159, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk.

The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.

It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.

The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when

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developing policies or guidance for particular sites.

Watercourses

The Cripsey Brook runs through the neighbourhood plan area. This watercourse is classified within the Thames River Basin Management Plan as having moderate status. The reasons it is failing to achieve good ecological status/potential are physical modifications, point source pollution and diffuse source pollution. Developments within or adjacent to this watercourse should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan. An assessment of the potential impacts of the neighbourhood plan on this watercourse under WFD should be included within any SEA/SA appraisal.

Should you have any queries regarding this response, please contact me.

Yours sincerely

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