

Dear Planning Policy

Thank you for consulting the Environment Agency on your recent Local Plan consultation. Many of the comments we made on your draft local plan in December 2017 still apply but for your ease we have reiterated below the key points that we feel the Local Plan should address in relation to issues within our remit.

Flood Risk

The policy and site allocations in Local Plans provide an opportunity to address flood risk and coastal change.

- Policies and allocations should ensure no inappropriate development is located in areas at high flood risk.
- A sequential approach should be taken to the allocation of sites.
- The plan should ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere.
- Where possible the plan should help contribute to reducing flood risk for existing communities
- The plan should take account of the impacts of climate change including adopting proactive strategies to mitigate and adapt to climate change and plan new development to avoid increased vulnerability.

Water Quality

A high quality water environment supports wildlife but also provides quality of life benefits and can support local economies including boosting land and property values, agriculture, tourism and recreation. Where it is not properly planned for, new development can increase pressure on the water environment. Where development is properly planned it can provide opportunities to protect and enhance the water quality, amenity and biodiversity within a catchment.

- Waste water treatment and the quality of the water environment should be addressed in the Local Plan to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality.
- The local plan should help to ensure that the quality of surface, ground and coastal waters continues to improve for the benefit of people, the economy and wildlife.
- Protection and enhancement of the environment and promotion of multifunctional benefits such as climate change adaptation, delivery of the River Basin Management Plan objectives, flood risk management, including SuDS should be promoted.
- The plan should try to take a catchment scale approach to the water environment in the development of policies.

Water Resources

Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. Local plans can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.

- The plan should recognise and protect water as a precious resource. The capacity and quality of water supply systems and any impact development may have on the environment, also including in relation to wastewater disposal should be considered. Water usage and water disposal (and therefore water treatment and discharges) are intrinsically linked.
 - Water efficiency measures should be a requirement within the plan to reduce water usage.
- Projected water availability for proposed growth should take account of climate change.

Biodiversity (including Green infrastructure)

Local Plans can provide a mechanism to help improve biodiversity. This can be done by establishing strategies, setting out policies and land use options to ensure development avoids damage to existing wildlife sites and corridors. They can also provide opportunities to develop new habitats to link rivers, lakes, wetlands and the coast. This will provide multiple benefits to society, including helping to reduce the impacts of climate change and enabling species and habitats to move as environmental conditions alter.

- The local plan should include policies that enhance and protect biodiversity and contribute to helping wildlife adapt to climate change and reducing its adverse impacts.

- Future development that improves biodiversity through valuing nature and protecting and enhancing healthy, well-functioning ecosystems and ecological networks should be encouraged.

Groundwater Protection

Groundwater is an important resource that we rely on every day. It provides the majority of drinking water in some parts of the country; sustains base flow and ecology in our rivers; and supports lakes and wetland ecosystems. Local plans can help to ensure that groundwater is protected and where necessary improved during regeneration and development.

- Policies should ensure that groundwater is protected and improved for the benefit of people and the economy
- Local plan policies help to ensure that developing land affected by contamination won't create unacceptable risks, or allow existing ones to continue.

If you have any queries regarding any of the above please give me a call.

Kind regards

