

## Environment Agency Comments

Dear Planning,

Thank you for consulting the Environment Agency on Thrupton neighbourhood Plan submission document (Regulation 16).

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

We have reviewed the documents submitted and would like to make the following response.

### **Policy EN10 Flood Risk**

We note the reference in para 5.44 that it is not the intention of the Neighbourhood Plan (NP) to repeat the policies within Test Valley Local Plan relating to flood risk and water management, however, as it currently stand's the wording of policy EN10 is misleading, and not one we could support.

In accordance with the National Planning Policy Framework (NPPF) [paragraph 155] inappropriate development in locations at risk of flooding should be restricted. This should be done by directing development away from areas at highest risk (NPPF para. 155) through the application of the Sequential Test (NPPF para. 158).

We would suggest that the policy is amended to say something like *"In line with the application of the Sequential Test any future development within the Thrupton area will be directed to the areas at the lowest probability of flooding (Flood Zone 1). Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA) as well as other background documents such as the Council's Strategic Housing & Land Availability Assessment (SHLAA)".*

To strengthen the plan further we would suggest that you include a policy which sets out how you will be adapting to and mitigating to the effects of climate change, which you have identified as a threat in your SWOT analysis.

### **Policy ENV5 Pillhill Brook**

In 2016 the Pillhill Brook was classified to be overall good both in terms of its ecological and chemical value under the Water Framework Directive (WFD) further information can be found here <https://environment.data.gov.uk/catchment-planning/WaterBody/GB107042022790>.

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.

Pressures on the water environment arise from point sources, such as waste water treatment works, and diffuse pollution sources such as urban water run-off.

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.

We would advise that this policy could be written to differently to seek greater protection of the Pillhill Brook for example:

~~“Development proposals that would adversely affect the following features of Pillhill Brook will not only be supported subject to the following:~~

A: Development will enhance the features of the Pillhill Brook, landscape character, appearance and setting;

B: Development will achieve a Biodiversity net gain;

C: Development will not compromise the ability for the headwaters of Pillhill Brook and ~~watercourse~~ the river corridor to function naturally throughout seasonal variations and;

D: The water quality of the Pillhill Brook is improved and development does not lead to pollution of the water environment