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West Oxfordshire District Council
Planning And Leisure Services
Elmfield, New Yatt Road
Witney
Oxfordshire
OX28 1PB

Our ref: WA/2006/000262/OR-
12/PO1-L01
Your ref:
Date: 19 September 2017

Dear Ms Harvey,

Eynsham Neighbourhood Plan – proposed submission

Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for Eynsham. 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://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Flood Zone 2 & 3:

Your plan includes potential site allocations which are located in areas of *flood zone 2 and 3*. In accordance with the National Planning Policy Framework (NPPF) para 100-102, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. We are pleased to note para 14.14 acknowledges the NPPF and its requirement for sequential testing of sites to minimise 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.

Cont/d..

You should also consider whether there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Lead Local Flood Authority's 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 developing policies or guidance for particular sites.

Watercourses

Several main river watercourses, including the Chil Brook and the Eynsham Mead Ditch run through the neighbourhood plan area. Under the Thames River Basin Management Plan, these watercourses are currently failing to reach good ecological status. Developments within or adjacent to these watercourses 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.

We are pleased to note that policy ENP4a of your plan requires new development to provide biodiversity gain for the neighbourhood plan area, and also to protect areas close to watercourses.

Yours faithfully

Judith Johnson
Sustainable Places team

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