

John Fox
Chair
Wheatley Neighbourhood Plan
Via e-mail

Our ref: WA/2006/000324/PO-05/PO1-L01

Date: 6 June 2017

Dear John,

Wheatley Neighbourhood Plan

Thank you for consulting us on the draft Neighbourhood Plan for Wheatley. We aim to reduce flood risk, while protecting and enhancing the water environment.

We are unclear about some of the proposed site 'allocations' within your Neighbourhood Plan, with some potential flood risk concerns for some of the sites as outlined below.

Site allocations

Sections 6 and 7 of the Neighbourhood Plan discusses potential development sites within Wheatley. In particular, paragraph 7.10 discusses those sites where future development would be supported – namely sites WHE15, 16, 18, 22 & 25. It is not clear from the plan whether these are formally 'site allocations'.

We have concerns that parts of sites WHE15 and 16 are in Flood Zones 2 and 3. Therefore, if 'support' for the development of these sites (which may therefore be considered an 'allocation') is brought forward in the Plan, we would expect to see sufficient flood risk information. It would need to be demonstrated that the sites have passed the flood risk Sequential Test and would need to be assessed using a Level 2 Strategic Flood Risk Assessment. Without this evidence, we would have to find these allocations 'unsound'.

In accordance with the National Planning Policy Framework (NPPF) para 100-102, the Sequential Test must be 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).

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 Lead Local Flood Authority (Oxfordshire County Council) 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. Any relevant 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.

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However, we also note that for two of the sites mentioned – WHE18 & WHE25, you have formulated specific policies for the sites in section 9 of the Plan. We have no flood risk concerns with either of these sites.

Further advice

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

If you have any queries about this response, please do not hesitate to contact me.

Yours sincerely,

Clark Gordon
Sustainable Places Planning Specialist

Direct dial 0203 025 8998

E-mail planning_THM@environment-agency.gov.uk

cc Planning Policy – South Oxfordshire District Council