

**Fiona Ajram**

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**From:** [REDACTED]  
**Sent:** 22 January 2018 14:29  
**To:** PlanningPolicy NDDC  
**Subject:** Environment Agency Response to: WX/2006/000033/CS-06/IS1-L01  
**Attachments:** PlanningProposal.rtf

The Local Development Document has been reviewed and I enclose the Environment Agency's comments on:

Core Strategy  
North Dorset District Council  
Core Strategy

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Mr Edward Gerry  
North Dorset District Council  
Nordon Salisbury Road  
Blandford Forum  
Dorset  
DT11 7LL

**Our ref:** WX/2006/000033/CS-  
06/IS1-L01  
**Your ref:**  
**Date:** 22 January 2018

Dear Mr Gerry

## **NORTH DORSET LOCAL PLAN REVIEW – November 2017**

Thank you for consulting the Environment Agency on the above mentioned document.

We have the following advice in regards to the review of the Local Plan and its associated Policies, rather than specific comments the direction of growth in each community.

### **Flood Risk**

We do not wish to comment on directions of growth at this time because the flood risk evidence needs to be updated and considered by your Authority prior to further refinement of the potential allocations. Whilst we are aware of the work that is being done to update your Strategic Flood Risk Assessment, we would highlight that failure to update the information and evidence base adequately before submission would result in the plan being unsound.

### Sequential Test / Approach

In order to comply with National Planning Policy you must demonstrate through evidence that you have considered flood risk in the site allocation process. You must therefore ensure that your Strategic Flood Risk Assessment (SFRA) is updated, to apply the Sequential Test and the Exception Test where necessary.

You should also consider inclusion of other sources of flooding in any updated SFRA, including surface water runoff. This is important when considering site allocations as our published flood maps for planning do not cover all catchments below 5km<sup>2</sup>. This is highlighted in locations where there are no published fluvial flood maps associated with the watercourse because of the size of catchment, but there are significant local records of flooding.

You should also consult with the Lead Local Flood Authority and your Authority's drainage engineer on the local flood risk issues.

National Planning Practice Guidance confirms that:

Environment Agency

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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*Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. According to the information available, other forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones.*

Given the nature of your Authority we would not anticipate that sites would be promoted if they are at flood risk. It may be that if a site is partial at flood risk then it may be considered further before allocation. This is by considering only those parts of the site in flood zone 1 (low risk) for development through the application of the site specific sequential approach to development. You may however need to highlight that further consideration of the flood risk, including climate change, will need to occur on any of these site.

Further guidance on flood risk and updating your Flood Risk Assessment can be found under the National Planning Guidance at:  
<https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-in-local-plans>

#### Infrastructure requirements and Natural Flood Risk Management

Please note that if you plan was to promote growth or development in a flood risk area, for example Blandford Town Centre, then you would need to put forward your justification and then indicate any infrastructure requirements to ensure a safe development. This would be through a Strategic Flood Risk Assessment Level 2 and Flood Risk Management Strategy to demonstrate the development can be safe for tis lifetime.

The northern parts of your Local Authority area have been identified as having potential for natural flood risk management solutions. Therefore, it is essential that any flood risk policy gives support to this matter. On this point we would be disappointed if the Royal Forest proposal were to be removed from your local plan as this is an area that may be appropriate for natural flood risk measures.

#### **Biodiversity and Green Infrastructure**

The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

In this regards we would expect any policies to maintain the importance of watercourses and wetlands as priority habitats. We also would expect that within the promotion and development of any green infrastructure that this would deliver enhancement of these features as part of these strategic networks.

#### **Water Quality and Groundwater Protection**

National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, or being put at risk from unacceptable levels of water pollution.

Therefore, we would support policies in regards dealing with contaminated land and groundwater protection matters.

You should consult with Wessex Water in regards to infrastructure requirements to accommodate growth within the existing systems.

There are known surface water quality issue within the catchment so we would support any policy that could assist in delivering improvements though better land management. This could be through schemes such as the Royal Forest that promote changes in land use management from agricultural use to recreational.

Please contact me if you have any queries.

Yours sincerely

**MICHAEL HOLM**  
**Planning Advisor - Sustainable Places**

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