Our ref: SV/2015/108466/OR-

07/IS1-L01 **Your ref:**

Date: 16 September 2020

Wyre Forest District Council Planning Policy Wyre Forest House Finepoint Way Kidderminster Worcestershire DY11 7WF

F.A.O: Ms. Helen Checketts

Dear Madam

Bewdley Neighbourhood Plan SEA Screening Report

Thank you for your consultation on the above. We acknowledge the screening assessment which has been undertaken for the Bewdley Neighbourhood Plan and that this concludes that an SEA and a HRA are not necessary.

SEA Screening: Based on our indicative Flood Map for Planning, it appears that parts of the neighbourhood plan area lie within Flood Zone 3 (high risk, 1% annual probability of fluvial flooding) or the River Severn.

Other potential development areas may be at flood risk given the presence of 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km2).

There is also a Source Protection Zone (1) to the south east of the NP area. This is sensitive to development and other environmental pressures.

We note the conclusion that, due to the lack of allocations taken forward through the Bewdley Neighbourhood Plan, the Neighbourhood Plan is unlikely to have significant adverse effects on the fabric and/or setting of key heritage assets in the town, or on the key features affecting the integrity of SSSIs present locally.

Notwithstanding the above, the plan could identify a series of criteria based policies against which development proposals should be assessed within the neighbourhood plan area.

We concur with the SEA screening document final conclusion that a Strategic Environmental Assessment is not required; particularly noting NPPG Paragraph: 046 Reference ID: 11-046-20150209 which states:

Environment Agency

Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.

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"A strategic environmental assessment may be required, for example, where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the <u>Local Plan</u>".

Whilst it may not be mandatory, a Sustainability Appraisal (SA) may be useful tool in assessing the plan.

Future considerations: We would only make substantive further comments on the plan if you were seeking to allocate sites in Flood Zone 3 and 2 (the latter being used as the 1% climate change extent perhaps). Where an 'ordinary watercourse' is present this would need to be assessed and demonstrated as part of the evidence base within a Strategic Flood Risk Assessment (SFRA) i.e. to inform the sequential testing of sites and appropriate / safe development.

Reference to flood risk and the Environment Agency flood defences is noted within the Screening Report, specifically the support for permanent flood defences at Beales Corner. We would be happy to comment further on this once the Plan is further developed.

We do not offer detailed bespoke advice on policy but advise you ensure conformity with the adopted local plan and refer to guidance within our area neighbourhood plan 'proforma guidance' (latest copy attached). This has guidance on flood risk, water quality, including wastewater, and other environmental considerations.

I trust that the above is of assistance.

Yours faithfully

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