

Malvern Hills and Wychavon District
Councils
Forward Planning
Civic Centre
Queen Elizabeth Drive
Persore
Worcestershire
WR10 1PT

[REDACTED]
[REDACTED]
Your ref:

Date: 01 July 2021

F.A.O: Mr. Reiss Sadler

Dear Sir

**NORTON-JUXTA-KEMPSEY NEIGHBOURHOOD PLAN – REGULATION 16
CONSULTATION.**

I refer to your email of the 21 May 2021 in relation to the above consultation.

We previously provided standard comments to the SEA/HRA Screening Opinion Consultation in our response dated, 18 November 2020 Ref: SV/2010/104075/SE-08/SC1-L01. In addition, as you are aware we have also previously forwarded a copy of our area Neighbourhood Plan pro-forma guidance.

Having reviewed the Submission Draft Plan, dated March 2021, we would offer the following comments for your consideration at this time.

We do not offer detailed bespoke advice on policy but advice you ensure conformity with the local plan and the aforementioned guidance. Notwithstanding the above, for example it is important that these plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth.

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.

Therefore, in the absence of specific sites allocated, we would not offer a bespoke comment at this time. You are advised to utilise our area guidance and pro-forma which should assist you moving forward with your Plan.

Environment Agency
[REDACTED]

www.gov.uk/environment-agency

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The purpose of the guidance is to assist the preparation of the NDP, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk.

Please note: We are in the process of updating the allowances for peak river flow and [Flood risk assessments: climate change allowances](#) following research completed in 2020. This research sought to better understand how different river catchments respond to changes in rainfall due to climate change within river basin districts. It uses the latest rainfall projections in [UKCP18](#). We are currently developing new allowances that represent the findings of this research, but are also user friendly. We anticipate that the new peak river flow allowances will be published in July 2021. When they are published we will provide an updated briefing to explain the changes. This will update advice within the NPPG and our local area Climate Change Guidance.

I trust the above is of assistance at this time.

Yours faithfully

Mrs Anita Bolton
Planning Advisor

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