

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

Our ref: SV/2010/104075/OT-
15/SB1-L01
Your ref:
Date: 11 August 2021

F.A.O: Reiss Sadler

Dear Sir

BROADWAY NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION.

I refer to your email of the 22 July 2021 in relation to the above consultation.

We previously provided standard comments to the SEA/HRA Screening Opinion Consultation in our response dated, 25 November 2020 (ref: SV/2010/104075/SE-09/DS1-L01) and to the Regulation 14 Pre-submission Consultation received via Broadway Parish Council. As you are aware we have also previously forwarded a copy of our area Neighbourhood Plan pro-forma guidance.

Having reviewed the Neighbourhood Plan Submission Version, 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.

Whilst we note the plan includes one site allocation (Policy HD4, land off Kennel Lane/Church Close), in accordance with our Flood Map for Planning (Rivers and Sea) the site is shown to be located wholly within Flood Zone 1 (low risk zone). Therefore, in the absence of specific sites allocated within Flood Zones 2 and 3, we would not offer a bespoke comment at this time.

Environment Agency



www.gov.uk/environment-agency

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You are advised to utilise our area guidance and pro-forma which should assist you moving forward with your Plan.

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: Whilst our area guidance refers to Climate Change allowances updated in March 2020, on 20 July 2021 the guidance was revised further to reflect the latest projections in UK Climate Projections 2018 (UKCP18) relating to peak river flow allowances.

We are currently developing new allowances that represent the findings of this research, but are also user friendly. On completion we will update the advice provided in our local area Climate Change Guidance and our Neighbourhood Plan pro-forma guidance.

As the plan is at the final stage we are not advising you to consider these emerging new allowances at this stage in your plan making programme, however the updated guidance can be viewed at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

I trust the above is of assistance.

Yours faithfully

Mrs Anita Bolton
Planning Advisor

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