

Planning Policy Team
South Somerset District Council
The Council Offices
Brympton Way
Yeovil
Somerset
BA20 2HT

Our ref: WX/2006/000321/OR-
16/IS1-L01
Your ref:
Date: 06 July 2022

Dear Sir/Madam

ILMINSTER NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION

Thank you for referring the above Neighbourhood Plan, which was received 18 May 2022.

The Environment Agency have no further comments to make in addition to those previously submitted under separate cover dated 25 June 2021 remain relevant and are repeated here for your information:

The Environment Agency wishes to make the following comments for your information:

We aim to reduce flood risk, whilst protecting and enhancing the water environment. We focus our detailed engagement where the environmental risks are greatest, therefore we offer the following advice on this Neighbourhood Plan.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: Planning for the Environment at the Neighbourhood Level.

Flood Risk

National and Local Plan Policy approach is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas, and other areas affected by flooding. The plan should also seek flood risk management opportunities (e.g., natural flood management), and to reduce the causes and impacts of flooding (e.g., using sustainable drainage systems and natural flood management in developments).

Environment Agency
Rivers House, East Quay, Bridgwater, Somerset, TA6 4YS.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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Local Planning Authorities' Strategic Flood Risk Assessments (SFRAs) should be the primary source of flood risk information in considering whether neighbourhood planning areas may be appropriate for development.

Other important sources include the interactive maps of flood risk available on the Environment Agency's web site. Local Planning Authorities (LPAs) should make available to the Town Councils any reports or information relating to the SFRA and share any other information relevant to flood risk (such as the application of the Sequential and Exception Tests to the Local Plan). There may also be specific issues or local policies, e.g., a Local Flood Risk Management Strategy or Surface Water Management Plan, which should be considered when assessing and managing surface water matters.

If the plan proposes development in flood risk areas, the Sequential Test should be demonstrated and if necessary, the Exception Test applied. Where areas under consideration for development are not consistent with growth identified in the Local Plan, further information will be needed to demonstrate that any development proposed by the neighbourhood plan passes both tests.

Further guidance on the approach to individual development proposals, or where a Neighbourhood Development or Community Right to Build Order is proposed, in an area at risk of flooding can be found at: https://www.gov.uk/guidance/flood-risk-and_coastal-change

Works to any streamside walks may require Land Drainage Consent from the Local Planning Authority.

Biodiversity

The National Planning Policy Framework (NPPF) 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.

Similarly, the Government's 25 Year Environment Plan (February 2018) has policy for embedding an 'environmental net gain' principle for development, including housing and infrastructure. Therefore, we expect all plans and policies to demonstrate how they will deliver this principle.

Neighbourhood Plans have the potential to affect biodiversity or geodiversity. They should seek opportunities to work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area.

The NPPF states that the planning system should recognise the wider benefits of ecosystem services. Information about ecosystems services is in Biodiversity 2020: A strategy for England's biodiversity and ecosystems services. An Introductory guide to valuing ecosystems services has also been published by Defra along with a practice guide, which could, where appropriate, inform plan-making and decision-taking on planning applications.

The National pollinator strategy: for bees and other pollinators in England is a 10-year plan to protect pollinating insects which support our food production and the diversity of

our environment.

Biodiversity enhancement in and around development should be led by a local understanding of ecological networks, and should seek to include:

- habitat restoration, re-creation, and expansion,
- improved links between existing sites,
- buffering of existing important sites,
- new biodiversity features within development, and
- securing management for long term enhancement.
- Green/blue infrastructure and recreational opportunities.

Further guidance can be found at: <https://www.gov.uk/guidance/natural-environment>

Water Quality and Resources

Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

Wastewater infrastructure improvements are particularly encouraged as nutrient enrichment in the surrounding area is particularly sensitive and would be welcomed.

Protecting and improving water bodies may be relevant when drawing up a neighbourhood plan or considering a neighbourhood development order. It is always useful to consult the water company about whether water could be a concern.

We would therefore advise you speak to your local sewerage infrastructure provider to understand any constraints in your local area.

Water efficiency measures should be incorporated into development as this conserves water for the natural environment and allows cost savings for future housing occupants.

Further information can be found at: https://www.gov.uk/guidance/water-supply_wastewater-and-water-quality

Climate Change Strategy

A strategy should be drawn up and embedded within the Plan to set out guidance to deal with the climate emergency and to become carbon neutral as soon as practicable. Innovative methods should be considered and encouraged.

Our soils are one of the biggest carbon sinks available to reduce climate change therefore we suggest the concept of building soil depth and quality could be included. The prevention of further soil depletion through runoff, at the very least, should be included. Sustainable land management practices will play a large role in this.

Green Corridors

The inclusion of aspirations for greening river corridors for biodiversity improvements are encouraged, set back of development would create recreation and access for maintenance benefits. Any lighting should be set back and suitably designed with wildlife in mind.

New development should be encouraged to create green / blue infrastructure and maintain habitats, for example creating wildlife corridors or green space, tree planting etc.) and advocating the use of green roofs.

Blue/Green Infrastructure has a real opportunity to link with and deliver against Carbon Net Zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development.

Sustainable development

We support sustainable development, in particular the encouragement of resource efficiency, waste minimisation and recycling. The Neighbourhood Plan should encourage developers to ensure new development is energy / carbon neutral in the future.

Energy levels and water efficiency requirements for new housing to be set up to the equivalent of Level 4 of the Code for Sustainable Homes.

The concept of Water Sensitive Urban Design (WSUD) is encouraged, and the following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning - wsud_ideas_book.pdf (susdrain.org)

Further advice on the production of Neighbourhood Plans can be found at the Planning Advisory Service function of the Local Government Association, which has detailed advice on neighbourhood planning.

SEA/HRA

We are satisfied with the documents and conclusions from the Environment Report for the SEA, and the HRA and of the benefits of the Neighbourhood Plan.

If you wish to discuss any of the above, I can be contacted on the number below.

Please quote the Agency's reference on any future correspondence regarding this matter.

Yours faithfully

[Redacted signature block]

Direct dial [Redacted]
Direct e-mail [Redacted]