

Our ref: KT/2006/000284/OR-29/PO1-L01

Date: 30 January 2025

Dear Nick Woollett

**Southborough and High Brooms Neighbourhood Development Plan
Invitation to provide comments on the Pre-Submission Consultation
(Regulation 14)**

Thank you for your consultation on the above which we received by email on the 8th of December 2024. We note that Flood Risk and Groundwater have not featured in the pre-submission version of your plan which we feel should be and have provided the area specific comments below in addition to our Neighbourhood Plan Advice Note. Our comments are under Flood Risk and Groundwater headings below for ease of reference.

Flood Risk

We recommend including a chapter or section that addresses flood risk, as certain areas within the parish are susceptible to fluvial and surface water flooding. It is essential to consider both fluvial and surface water flood risks comprehensively and reflect this in the plans and policies for the area. Furthermore, it is crucial to adopt a sequential approach to any new development, prioritizing placement in the lowest risk areas and avoiding high flood risk zones whenever possible. In instances where this is not feasible, site-specific Flood Risk Assessments (FRAs) should accompany any proposals within flood zones 2 and 3. These assessments must ensure that appropriate flood risk mitigation measures are applied, in accordance with the National Planning Policy Framework (NPPF) 2021. The FRA should demonstrate that the development will remain safe throughout its entire lifetime without exacerbating flood risk elsewhere. Where feasible, the development should aim to reduce overall flood risk.

We strongly encourage the implementation of flood mitigation measures in new developments, such as raising finished floor levels, avoiding ground floor residential development in high-risk areas, and preventing the loss of flood storage.

We would also appreciate the inclusion of an objective that evaluates the impact of new developments on nearby watercourses. Where feasible, this objective should promote the implementation of Natural Flood Management techniques, including mitigation measures, to reduce the flood risk to the area.

Groundwater protection

It may be beneficial to create a Foul Water Drainage Policy which identifies the drainage hierarchy and identifies that for any large development, it would be unlikely

for these developments to be permitted to discharge via a non-mains drainage system given the potential risk to the environment. Any development proposing to discharge to a package treatment plant, should identify if their proposed drainage strategy is compliant with the [General Binding Rules](#). Developments which do not meet the General Binding Rules may require a permit and should consult with the Environment Agency. Should a permit be required it cannot be guaranteed that a permit would be granted and as such we would recommend that any permit applications be run concurrently with any planning applications.

Major developments must provide provision to attach to mains sewer as part of the development to prevent discharge of large volumes of treated effluent to the environment. This should be agreed through liaison with the Local Water Undertaker.

Reference should be made to the [Environment Agency's approach to groundwater protection](#), to enable developers to appropriately understand the required expectations from the Agency for any proposed developments.

The below is an extract from a similar Neighbourhood Plan:

Private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. Planning applications must demonstrate that connection to the public sewer is feasible and any mitigating measures necessary to enable a connection must be identified and agreed between the applicant and the sewerage undertaker.

If a non-mains drainage solution is proposed, an applicant must demonstrate that it is not practicable to connect to the public sewer. Sufficient information to understand the potential implications for the water environment of non-mains drainage must be submitted, including the Environment Agency's Foul drainage assessment form (FDA1). The hierarchy of non-mains alternative solutions must be followed:

- a. package sewage treatment plants (which may be offered to the sewerage undertaker for adoption) where effluent goes through a wetland prior to discharge into the watercourse/ground as that will improve water quality; then*
- b. septic tanks; then*
- c. in the last instance, a cesspool if no other solution is possible.*

We hope you find our comments in addition to our advice note helpful at this stage of the Neighbourhood Plan process.

Yours sincerely

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Planning Specialist**

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