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Planning Policy
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Our ref: WX/2022/136113/OR-06/IS1-L01
Your ref: Burton and Winkton NP Revision

Date: 01 May 2026

Dear Jo,

Burton and Winkton Neighbourhood Plan Regulation 14 Resubmission

Thank you for re-consulting the Environment Agency on further policy updates for the Burton and Winkton Neighbourhood Plan.

We have provided comments on relevant policy changes, and general comments from our previous response to the Burton and Winkton Neighbourhood Plan below.

Flood Risk Changes

Following the updated Environment Agency's Flood Map for Planning (NaFRA2), Flood Zones post-March 2025 have changed. As a result, flood zone extents within Burton and Winkton Neighbourhood Plan area have changed, and therefore, we wish to revise our previously provided comments regarding flood risk.

See here for further information on updates to flood risk mapping: National assessment of flood and coastal erosion risk in England 2024 - GOV.UK.

Strategic Environmental Assessment (SEA)

Due to changes in fluvial flood risk to the sites being brought forward for allocation following NaFRA2, we believe an **updated SEA may be required**.

Policy Change Comments

Policy 19: Land South of Burton

We acknowledge the change from 40 to 45 dwellings, and the addition of a suitable buffer zone between development proposed and any watercourses for flood risk purposes.

We wish to highlight that there is a culverted main river cutting through the west of the site, with the western portion of the site now residing within Flood Zone 2 following NaFRA2. The aforementioned buffer zone should include avoiding development within 8m of this culvert to prevent risk to life and property. Any future development on this site may require site specific flood risk modelling, including a survey of the existing culvert to assess its integrity.

Much of the site area lies within the Climate Change 2070-2125 (Future Flood Zone). There is an area of Flood Zone 1, the lowest risk of flooding, in the north-east of the site area, where Burton Drain is not present.

Any future development at this site must follow a sequential approach to avoid development in the part of the site, which is in the identified flood zones, and ensure development takes place in areas of the lowest flood risk.

Although the existing main river running through the site is currently culverted, any development at this location should seek to enhance the watercourse where possible, this may include daylighting the main river and introducing natural flood risk management features.

Policy 21: Barns at Hawthorn Farm and Dairy

It should be noted that due to the NaFRA2, the South Brockhampton area is now within Flood Zones 2 and 3. We recommend avoiding any new and/or more vulnerable development within this area, and will need to be consulted if a planning application to change the use from agricultural to office space is proposed.

Please note, if the Plan is seeking to potentially replace the existing building, the proposed development would be subject to the Sequential Test. In the first instance, the Plan should identify other available sites in the lowest areas of flood risk prior to proposing development at this location.

Environment Agency Response 17 October 2024

Flood Risk

The neighbourhood plan includes areas which are located in flood zones 2 and 3. In accordance with the National Planning Policy Framework (NPPF) paragraphs 165-171, we remind you that the Sequential Test and Exception Test should be satisfied if your plan is proposing development or promoting growth in these areas. This should ensure development is directed to the areas of lowest risk of flooding, taking climate change into account. The application of the Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA).

It is important that your Plan also considers whether the flood risk issues associated with any proposed development can be safely managed to ensure development can come forward. Without this understanding your Plan is unlikely to complaint with the National Planning Policy Framework (NPPF).

The Lead Local Flood Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how areas at risk of surface water flooding can be managed. This may be useful when developing policies or guidance.

For allocations in areas at increased risk of flooding and for sites in flood zone 1 where the access/egress route may be affected by flooding, flood warning and emergency response is a key consideration to ensure development can be delivered safely. We do not normally comment on, or approve the adequacy of, flood emergency response procedures, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to

occupants/users covered by our flood warning network. Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered.

One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development. We also advise you undertake appropriate consultation with your local planning authority, emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG. You should therefore consider the implications for access/egress with respect to flooding on any allocations including those where the development site may be at low risk.

The plan should ensure that a suitable buffer is maintained between any proposed development and any watercourse/waterbody/flood defence, in order to maintain access, protect biodiversity and avoid impacts to flood defence infrastructure. Without this the plan may not be compliant with national policy and will likely fail the basic conditions for neighbourhood plans.

Managing and Adapting to Climate Change

Our latest Adaptation report, Living better with a changing climate (publishing.service.gov.uk) shows that England will inevitably face significant climate impacts, and that early action is essential. Significant climate impacts are inevitable especially for flood and coastal risks, water management, freshwater wildlife and industrial regulation. On-going policy reform presents an opportunity to strengthen the role the planning system plays in mitigating and adapting to climate change, and to ensure a fair transition to a low carbon economy. Therefore your plan should ensure any policies, site allocations and design of development, takes the future challenges of climate change into account.

Drainage and Wastewater Infrastructure

Where your plan proposes development or promotes growth, we recommend early consultation with your local water company. Your plan should determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment and disposal of quantity and quality of water associated with any proposed development within environmental limits of the receiving waterbody. This may impact on the housing figures and the phasing of development. Please note that if there is not sufficient capacity in the infrastructure then we must be consulted again with alternative methods of disposal.

Green and Blue Infrastructure

Green and blue infrastructure is important for adaptation and resilience to climate change, provides health and wellbeing benefits, allows nature recovery, improves water quality, and assists in delivering net zero targets. Your plan should include policies which support and encourage opportunities to incorporate green and blue infrastructure, including natural flood management approaches, river restoration including deculverting/naturalisation, and the protection of existing natural assets. You may also wish to identify important networks in your plan area and ensure policies manage development over or near these areas.

Cont/d..

Closing

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, English Heritage and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood Plans - Locality Neighbourhood Planning

Yours sincerely,

Jay Shaw (on behalf of Lindsay Grant)

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