

RE: Draft Belgravia Neighbourhood Plan - Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA)



HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>

To Avery, Brandon: WCC



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Dear Brandon,

Thank you for consulting us on the Strategic Environment Assessment Screening Report and Habitats Regulations Assessment Screening Report March 2023 for the Belgravia Neighbourhood Plan.

In accordance with our statutory duty, we have reviewed the SEA Screening Statements in consideration of environmental constraints and potential significant environmental effects that are likely to result from the Neighbourhood Plan. To confirm, we do not anticipate that the Neighbourhood Plan will have any significant negative effects on the environment. Please note, we are unable to formally advise on whether the Neighbourhood Plan falls under the requirements of the Strategic Environmental Assessment (SEA) Directive.

Flood Risk

The Neighbourhood Plan includes areas which are located in Flood Zone 3 and Thames Tidal Breach Flood Extent. In accordance with the National Planning Policy Framework (NPPF) paragraphs 161-168, we remind you that the Sequential Test/Exception Test should be undertaken if the plan is proposing development or promoting growth to ensure development is directed to the areas of lowest flood risk taking climate change into account. The application of the Sequential Test should be informed by the Local Planning Authority's (Westminster) 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 comply with the NPPF.

As highlighted in the Westminster SFRA, proposed developments within areas at risk of tidal breach flooding will need to use flood resilient construction measures. We require all sleeping accommodation to be above the tidal breach level for any new development.

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.

Aquifers

Your plan includes areas which are located on aquifer. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

Wastewater infrastructure

If your plan proposes development or promotes growth we recommend early consultation with Thames Water to 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 watercourse. 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.

Kind regards,

Isabel Smith

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