

Bromsgrove District Council  
Planning Policy  
Burcot Lane  
Bromsgrove  
Worcestershire  
B60 1AA

**Our ref:** SV/2018/109855/SE-  
02/DS1-L01  
**Your ref:** SEA HRA NP  
**Date:** 24 April 2018

**Claire Holmes**  
Senior Planning Officer

Dear Madam

**Re: Consultation - SEA & HRA screening assessment for Lickey, Blackwell & Cofton Hackett Neighbourhood Plan.**

Thank you for your consultation on the above.

We note that the Lickey, Blackwell and Cofton Hackett Parish Councils are preparing a neighbourhood plan for the area covering Lickey, Blackwell and Cofton Hackett Parish which was designated by Bromsgrove District Council as a neighbourhood area in October 2014.

We acknowledge the screening assessment which has been undertaken. This concludes that an SEA and a HRA are not necessary.

**SEA Screening:**

Based on our indicative Flood Map for Planning, it appears that all of the neighbourhood area is within Flood Zone 1 (low probability of fluvial flooding).

However, some potential development areas are potentially at flood risk given the presence of 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km<sup>2</sup>).

The 'Summary of screening opinion' and reason for conclusion confirms that the Neighbourhood Plan area "will not be allocating any sites within its area".

Notwithstanding the above, the plan could identify a series of criteria based policies against which development proposals should be assessed within the neighbourhood area.

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shrewsbury, Shropshire, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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We concur with the SEA screening document final conclusion that a Strategic Environmental Assessment is not required; particularly noting NPPG Paragraph: 046 Reference ID: 11-046-20150209 which states:

*“A strategic environmental assessment may be required, for example, where:*

- a neighbourhood plan allocates sites for development*
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan*
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan”.*

Whilst it may not be mandatory, a Sustainability Appraisal (SA) may be useful tool in assessing the plan.

### **Future considerations**

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.

We do not offer detailed bespoke advice on policy but advise you ensure conformity with the adopted local plan and refer to guidance within our area neighbourhood plan ‘**proforma guidance**’ (latest copy attached). This has guidance on flood risk, water quality, including wastewater, and other environmental considerations.

I trust that the above is of assistance.

Yours faithfully

**Mark Davies**

Planning Specialist

Direct dial 02030 251661