

**Liz Pulley**

---

**From:** Hyland, Hannah <hannah.hyland@environment-agency.gov.uk>  
**Sent:** 03 February 2015 12:12  
**To:** Neighbourhood Planning  
**Subject:** 150203 Publication Response  
**Attachments:** 150203 Publication Response.pdf

Hi Valerie

Please find attached comments on the publication version of the Birdham Neighbourhood Plan.

Best regards,

Hannah

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Click [here](#) to report this email as spam

---

#### LEGAL DISCLAIMER

Communications on or through Chichester District Councils computer systems may be monitored or recorded to secure effective system operation and for other lawful purposes.



creating a better place



Valerie Dobson  
Chichester District Council  
East Pallant House  
1 East Pallant  
Chichester  
West Sussex  
PO19

**Our ref:** SX/2006/100184/PO-  
02/PO1-L01

**Date:** 03 February 2015

Dear Valerie

### **Publication of the Birdham Parish Neighbourhood Plan**

Thank you for consulting us on the publication version of the Birdham Neighbourhood Plan.

Having reviewed the document we recognise that housing allocations are proposed through this plan but note that they have already gained planning permission and therefore we make no further comments on these.

We support the inclusion of policies in relation to biodiversity and habitat improvement as well as those in relation to drainage. However, we would like to make some specific comments below that you may want to take forward through the examination process.

#### **Policy 18 – Flood Risk Assessment**

Policy 18 makes a requirement for anyone proposing development in Flood Zone 1 to submit a Flood Risk Assessment. This is a much stricter requirement than that under the NPPF and it is not clear what the purpose of this will be. It is recognised that there are specific issues within the parish in relation to surface water flood risk and the policy also makes reference to the “wet spots” identified in the map in Appendix 7.3. The policy may be clearer if the requirement for an FRA outside of Flood Zones 2 and 3 is directed solely to those areas not the entire area of Flood Zone 1. On a practical note consideration should also be given as to who would review those Flood Risk Assessments as part of the determination of any planning application.

Policy 21 – Wastewater disposal

We support the intention of this policy. However, we note there is specific reference made to on-site wastewater treatment within the policy text. We expect developments discharging domestic sewage to connect to the public foul sewer where it is reasonable to do so. The Environmental Permitting Regulations 2010 also specify that a small sewage discharge to water or groundwater is only exempt from the requirement for a permit if it “cannot reasonably, at the time it is first made, be made to the foul sewer”.<sup>[1]</sup> This requirement is in addition to the environmental considerations of an individual discharge.

I hope the above comments are useful. If you require any further information please let me know.

Yours sincerely,

Hannah Hyland

**Sustainable Places Planning Specialist, Environment Agency**

Direct dial 01903 703952

Direct e-mail [Hannah.hyland@environment-agency.gov.uk](mailto:Hannah.hyland@environment-agency.gov.uk)