



Designated Neighbourhood Area – South Woodford Neighbourhood Plan¹

¹ Map source - South Woodford Neighbourhood Plan Joint Strategic Environmental Assessment and Habitats Regulations Assessment Screening Opinion (AECOM April 2023).



CONTENTS

1.	Introduction2
2.	Responses from consultation with statutory organisations3
3.	Redbridge Council final screening opinion determination3
4.	Appendix 1: responses from consulted statutory organisations5



1. Introduction

- 1.1. The following Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report is Redbridge Council's response to a Strategic Environmental Assessment and Habitats Regulations Assessment Screening Opinion, facilitated by the council and undertaken by AECOM consultants on behalf of the South Woodford Neighbourhood Forum for their neighbourhood plan. This response is designed to determine if the council concurs with the conclusion of the screening opinion and whether the South Woodford Neighbourhood Plan requires a full SEA or HRA in accordance with the European Directive 2001/42/EC (the Directive).
- 1.2. A neighbourhood plan may require a SEA to comply with the Directive for *…the assessment of the effects of certain plans and programmes on the environment.*' The Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004. Under Article 3(3) and 3(4) of the SEA Directive, SEA is required for plans and programmes that *'determine the use of small areas at a local level and minor modifications to plans and programmes*' where they are determined to be likely to have significant environmental effects.
- 1.3. It is the Council's responsibility to identify whether a SEA should be undertaken for a neighbourhood plan. This is determined through an SEA screening exercise, or 'screening opinion.' The screening process is based upon consideration of standard criteria in Annex II of the Directive to determine whether the plan is likely to have 'significant environmental effects.' The result of the screening process undertaken for the South Woodford Neighbourhood Plan is detailed in this screening report.
- 1.4. It is often considered that screening can only be undertaken once a full draft of the Neighbourhood Plan has been prepared, however, planning practice guidance is clear that where it is determined that a neighbourhood plan is likely to have significant effects on the environment and that a SEA is necessary, work on this should start at the earliest opportunity, so that the processes for gathering evidence for the environmental report and for producing the draft neighbourhood plan can be integrated, and to allow the assessment process to inform the choices being made in the neighbourhood plan.
- 1.5. This means that the neighbourhood plan should be screened as soon as there is sufficient information available to consider whether the proposed content of the plan or its intent (e.g., will it allocate development sites or not?) are likely to lead to significant effects. Screening a plan early in its development will mean that, should a SEA be required, there is sufficient time to factor in the procedural steps required for SEA prior to the draft plan being consulted on (under Neighbourhood Planning Regulation 14).
- 1.6. Although the South Woodford Neighbourhood Forum have not produced a draft neighbourhood plan they requested a SEA screening opinion for the Vision and Aims which they drafted and consulted on in February 2021 as part of their neighbourhood plan preparation. South Woodford Neighbourhood Forum commissioned AECOM to undertake the screening opinion which was drafted in February and finalised in April 2023. Statutory consultation organisations (Environment Agency, Historic England, and Natural England) were consulted on the content of the screening opinion between April and May 2023.



- 1.7. Based on the conclusions of the screening opinion, the responses of the statutory organisations consulted, and considerations of council officers, Redbridge Council has determined that the proposed South Woodford Neighbourhood Plan is unlikely to result in significant environmental effects, raises no significant concerns regarding environmental considerations, and that therefore the preparation of a Strategic Environmental Assessment (SEA), and an Appropriate Assessment under the Habitats Directive is not required.
- 1.8. The South Woodford Neighbourhood Plan (SWNP) screening opinion undertaken by AECOM is attached as appendix 2.

2. Responses from consultation with statutory organisations

- 2.1. As stated in the introduction above statutory consultation organisations the Environment Agency, Historic England, and Natural England were consulted on the content of the South Woodford Neighbourhood Plan Joint Strategic Environmental Assessment and Habitats Regulations Assessment Screening Opinion between April and May 2023. Their responses are attached in full in appendix 1 below.
- 2.2. All of the statutory bodies consulted stated either that there are unlikely to be significant environmental effects from the proposed plan, that they concurred with the conclusion of the screening opinion undertaken by AECOM that the preparation of a Strategic Environmental Assessment (SEA) is not required, and that they do not have any significant concerns regarding environmental considerations implied in the South Woodford Neighbourhood Plan.
- 2.3. In summary the consulted organisations agree with the conclusion of the screening opinion, that neither a full SEA process nor an Appropriate Assessment under the Habitats Directive will be required for the South Woodford Neighbourhood Plan.

3. Redbridge Council final screening opinion determination

- 6.1. The Strategic Environmental Assessment and Habitats Regulations Assessment Screening Opinion concluded that the South Woodford Neighbourhood Plan will **not** require a full SEA process or an Appropriate Assessment under the Habitats Directive, and the statutory organisations that were consulted agree with this conclusion.
- 6.2. These conclusions are made on the basis that the South Woodford Neighbourhood Plan:
 - is <u>not</u> seeking to allocate land for housing or employment uses, or propose any development
 - is unlikely to have significant adverse effects on the setting and significance of key heritage assets, or on the key features affecting the integrity of the SAC and SSSI within and near the neighbourhood area
 - presents no mechanism for likely significant effects on any European sites, and therefore will not do so in combination with other projects and plans
 - and that this will remain the case provided the South Woodford Neighbourhood Plan does not make housing or employment allocations or contain other policies that would seek to deliver or allocate development beyond that allocated in the Redbridge Local Plan



- 6.3. In reviewing the screening opinion and the responses of the statutory organisations Redbridge Council also agrees with the conclusions expressed for the reasons set out above and in the screening opinion, and therefore determines that a full SEA process and Appropriate Assessment under the Habitats Directive will <u>not</u> be required for the South Woodford Neighbourhood Plan.
- 6.4. However, this determination may change if as a result the future development of a full draft of the South Woodford Neighbourhood Plan its planning policies indicate significant adverse effects would be likely to occur. If such new information came to light this could lead Redbridge Council to consider an updated determination for the screening opinion requiring a full SEA process and Appropriate Assessment under the Habitats Directive.



APPENDIX 1: RESPONSES FROM CONSULTED STATUTORY ORGANISATIONS₂

² Statutory organisations include English Heritage, Environment Agency, and Natural England. The responses in appendix 1 are web captures – please refer to PDFs included in the email with this screening opinion response for functional web links and email addresses.

Date: 23 May 2023 Our ref: 430083 Your ref: South Woodford Neighbourhood Plan

NATURAL ENGLAND

Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Mr Coke

Mr Ewan Coke

BY EMAIL ONLY

dpd@redbridge.gov.uk

London Borough of Redbridge

South Woodford Neighbourhood Plan – Review SEA & HRA Screening

Thank you for your consultation on the above dated and received by Natural England on 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the <u>National Planning</u> <u>Practice Guidance</u>. The guidance highlights three triggers that may require the production of an SEA, for instance 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 may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of <u>significant</u> populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local

record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Habitats Regulations Assessment (HRA) Screening

Natural England agrees with the report's conclusions that the South Woodford Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.

For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

Yours sincerely

Sally Wintle Consultations Team



Ewan Coke London Borough of Redbridge Floor 5, Lynton House 255 – 259 High Road Ilford, IG1 1NN Our ref: PL00792873

Direct dial: 020 7973 3221

Date: 27 April 2023

Dear Ewan Coke

Re: South Woodford Neighbourhood Plan SEA Screening

Thank you for inviting Historic England to comment on this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore, we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the South Woodford Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does not propose to allocate any sites for development.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.







Historic England strongly advises that the conservation staff of the relevant local authorities and the archaeological staff at <u>GLAAS</u> are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Greater London Historic Environment Record (GLHER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely

Nina Dierks

Business Officer

E-mail: Nina.Dierks@HistoricEngland.org.uk





RE: Ref 230425/JC08 RE: South Woodford Neighbourhood Plan: Joint SEA and HRA Screening Opinion



FAO: Ewan Coke

Dear Ewan.

Thank you for the opportunity to comment on the Joint Strategic Environmental Assessment (SEA) Screening Opinion for the South Woodford Neighbourhood Plan (SWNP).

Our role as statutory consultee allows us to provide an opinion on the likely significant effects on the environment, however it does not include advising on whether the plan falls under the requirements for the SEA Directive.

 \bigcirc Reply \bigcirc Reply All \rightarrow Forward 📑 \cdots

Thu 25/05/2023 13:35

Having reviewed the SEA Screening Opinion, we confirm that we do not have any significant concerns regarding environmental considerations within our remit. We understand that the SWNP is not seeking to allocate land for development, housing or employments uses but is intended to shape the design, development and delivery of sites already allocated through the Redbridge Local Plan via a design code.

We note that the SWNP is being brought forward within the wider strategic context provided by the Redbridge Local Plan which has already been subject to a sustainability appraisal process and a full SEA.

We recognise that Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. We have attached our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Please let us know if you have any further questions.

Best regards,

Rosie Brown

Planning Advisor, Hertfordshire and North London Sustainable Places Environment Agency | 2 Marsham Street, 3rd floor, London, SW1P 4DF 202030253783

HNLSustainablePlaces@environment-agency.gov.uk

Pronouns: she/her/hers (why is this here?)

Did you know that every email you send with an attachment costs 50g CO2e per person? Sending an email with a link only costs 4g CO2e per person. When emailing a document, Think Link and help us reach Net Zero.

Please also accept my thanks for your email in advance - each UK adult sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.





Hertfordshire and North London Neighbourhood Plan Advice Note

Updated: June 2021

Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <u>https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/</u>

Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water, and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<u>https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies</u>), and the Thames River Basin Management Plan (<u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf</u>) as appropriate.

customer service line 03708 506 506 incident hotline 0800 80 70 60



The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

Infrastructure Delivery

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

Flood risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk: If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <u>https://flood-map-for-planning.service.gov.uk/</u>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG): http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/.

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks, and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at <u>HNLenquiries@environment-agency.gov.uk</u> for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <u>https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</u>

customer service line 03708 506 506 incident hotline 0800 80 70 60



Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at <u>hnlenquiries@environment-agency.gov.uk</u>.

Ecology and Water Management

Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map: <u>https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a5</u> 6386

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering **biodiversity net gain**. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

customer service line 03708 506 506 incident hotline 0800 80 70 60



Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <u>http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/</u>. We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from <u>hnlenquiries@environment-agency.go.uk</u> on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<u>https://www.gov.uk/search?q=River+Basin+Management+Plans</u>).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

Groundwater Quality

Development must not cause pollution to the water environment. Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance: https://www.gov.uk/government/collections/groundwater-protection

To see if a proposed development is located within a Source Protection Zone, please use our online map: <u>https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs</u>

Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198doe-industry-profiles

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

Guiding principles for the Land Contamination

https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-forland-contamination-gplc

customer service line 03708 506 506 incident hotline 0800 80 70 60



Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/ Envirnment-Agency-approach-to-groundwater-protection.pdf

Water supply and foul drainage

When allocating sites in you Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our '<u>Water Stressed Areas – final classification</u>' 2013 explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

Surface water drainage

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <u>https://www.gov.uk/government/collections/groundwater-protection</u>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <u>https://www.gov.uk/government/publications/groundwater-protection-position-statements</u>

Please note

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.

If you have any questions please contact the Hertfordshire and North London Sustainable Places team: <u>HNLSustainablePlaces@environment-agency.gov.uk</u>

customer service line 03708 506 506 incident hotline 0800 80 70 60

