

Ms Carmel Edwards  
Programme Officer

**Our ref:** LT/2006/000221/CS-  
10/EW1-L02

**Your ref:**

**Date:** 14 October 2022

Dear Sir/Madam

Thank you for issuing the Environment Agency with the inspectors' Matters, Issues and Questions paper.

We have read through the document and have identified 3 questions which fall within the remit of the Environment Agency (Issue 4 part 4.1, Issue 12 parts 12.1b and 12.3b).

Please find our responses below in relation to the above mentioned questions.

#### **Matter 4**

#### **Issue 4 – Are the provisions of the plan in relation to the Priority Regeneration Areas justified and consistent with national policy?**

4.1 Are the assumptions of the amount of development to be delivered through the Worksop DPD justified and based on sound evidence? Having regard to the constraints imposed in relation to development in the flood plain, are the projected timescales for delivery of the plan and development proposed within it soundly based?

#### **Environment Agency response**

The Environment Agency and Bassetlaw District Council have a Statement of Common Ground (SoCG) in place in which, amongst other items, we agree to continue to work together to identify flood risk improvements and environmental enhancement opportunities within Worksop. To date we have shared our updated hydraulic modelling for the River Ryton with the Council and continue to meet with the Council regularly to share updates on the progress of the River Ryton flood risk management scheme.

As agreed within the SoCG it is our view that any future development allocations within Worksop should be supported by an appropriate level 2 Strategic Flood Risk Assessment (SFRA). This SFRA uses our best available data for flood risk from the River Ryton, this data supersedes our currently published flood zones, and as such the SFRA will result in an updated and improved understanding of flood risk in Worksop beyond the currently published data. We understand that this SFRA is currently being produced and we look forward to reviewing its contents in due course. In the case of any proposed development for Worksop the SFRA will identify the constraints imposed by the floodplain and the impact this may have on the development proposals.

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As the SFRA is likely to result in updates to the currently understood extents of flood zones 3 and 2 within Worksop, the council will need to consider undertaking the Sequential Test upon completion of the SFRA for any allocations that may be proposed within Worksop and the draft Worksop DPD.

The Environment Agency continues to work with key partners to investigate potential opportunities and options for reducing flood risk to Worksop. Investigation work is ongoing to explore the viability of a flood risk management scheme for Worksop which may support a reduction in flood risk to some of the proposed development sites in central Worksop. However at the present time, and while options assessment and economic appraisal is ongoing, we do not hold appropriate evidence to categorically state the type and level of intervention likely, or the location, scope or scale of any flood risk reduction the scheme may generate.

## **Matter 12**

**Issue 12 – Does the Plan set out a positively prepared strategy and policies relating to the historic and natural environment which are justified, effective and consistent with national policy?**

12.1 b) b) Do the requirements of the Policy reflect guidance in paragraphs 153 and 154 of the National Planning Policy Framework, and are they in line with the Housing: Optional Technical Standards? What is the justification for setting the water efficiency requirement at 110ltrs per day? How is this supported by evidence?

### **Environment Agency response**

In response to the Inspectors questions regarding the policy requiring developers to use the tighter water efficiency standards, please find the below two key points which support the tighter requirements which we trust the Inspector finds useful.

The Humber River Basin Management Plan (RBMP) highlights the current state of the water environment in the Humber catchment (document is found [here](#)) of which Bassetlaw falls within this area. The document highlights the impacts and pressures on the natural environment and also highlights options to support the prevention of this.

Within section 3.2 ‘Measures to prevent deterioration’ of the RBMP, on page 45 there is a section on ‘changes to natural flow and levels of water’ and on page 46 there is a section asking for influencers such as the local government to make sure water is used efficiently. The exact wording is ***‘Local government sets out local plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010’***.

To further support the inclusion of the tighter water efficiency requirement, the Severn Trent area was designated as ***‘an area of serious water stress’*** in the Environment Agency’s determination of areas of water stress that took place in 2021. This report can be found [here](#). Bassetlaw sits within this area and the report highlights how Local Authorities can use this determination to inform whether they can require the tighter water efficiency standard if they wish to do so.

Finally, on the 1<sup>st</sup> September 2022, DEFRA wrote to all chief executives of local authorities encouraging them to adopt the tighter water restrictions of 110 litres per

person per day (l/p/d) to support the sustainable use of water resources. The document references the Environment Agency's determination of areas of water stress that took place in 2021 and is already referenced above.

The impact of greater water efficiency on reducing flood risk, through the implementation of Sustainable Drainage Systems (SuDs) is referenced in the Flood risk and coastal change guidance note which can be found on the Gov.uk website. This can be viewed directly by visiting [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-and-coastal-change)

## **Matter 12**

### **Issue 12 – Does the Plan set out a positively prepared strategy and policies relating to the historic and natural environment which are justified, effective and consistent with national policy?**

12.3 b) Are the Policies supported by appropriate evidence? In the case of ST53 is the Bassetlaw Water Cycle Study 2010 sufficiently up-to-date? How was the River Ryton Flood Management Impact Zone defined?

#### **Environment Agency response**

It is our understanding that the River Ryton Flood Risk Management Impact Zone was defined by Bassetlaw District Council (BDC) within the draft Worksop DPD and using the current extent of flood zone 3a. The Environment Agency is supportive of the impact zone and the consideration it brings for improvements to flood risk overall. Furthermore, preliminary modelling undertaken for the flood risk management scheme has indicated that the heavily constrained channel of the Ryton, and multiple channel crossing points are significant contributors to flood risk within Worksop. These issues are likely best approached in partnership, through development planning and urban regeneration. The proposed impact zone represents a welcome opportunity for early engagement with prospective developers and is clear on the potential to reduce flood risk in this area of the town which is highly sensitive to changes in flood risk.

Whilst we will continue to work towards the development of a flood risk management scheme for Worksop, at this present time we do not hold appropriate evidence to categorically demonstrate the requirement for, or the scope, scale or impact of, a flood risk management scheme nor any site specific mitigation measures which may be appropriate within the impact zone.

As noted in our response to Matter 4, new modelling is now available for the River Ryton and so BDC may wish to consider updating the extent of the impact zone on completion of the forthcoming level 2 SFRA for Worksop.

Yours faithfully

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