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**Sent:** 19 July 2021 12:03

To: Local Plan

**Subject:** EA Response Eastleigh LP Main Mods Consultation

**Categories:** Orange Category, Red Category

**Dear Planning Policy** 

Thank you for consulting the Environment Agency on the proposed main modifications for your local plan.

We have very few comments to make on this document and are satisfied with the proposed changes that relate to issues within our remit. We do however have 2 comments in relation to MM40 regarding DM6, mainly for consistency purposes.

We suggest that the words 'at least' are added to bullet 1b so that it reflects the same wording as 1a (see red wording added below).

1. New development (excluding extensions to dwellings and changes of use), will only be permitted if it incorporates

Sustainable Drainage Systems (SuDS). Wherever feasible, naturalised filtration should be included within the treatment train

as follows:

a. On sites of 1 hectare or more, or within 100 m of the River Itchen SAC or Solent Maritime SAC, SuDS schemes should

include at least three forms of naturalised filtration. On sites within 100m of headwaters and tributaries draining into a SAC,

SuDS schemes should include at least three forms of naturalised filtration unless hydrological studies and project-level

Habitats Regulations Assessment demonstrate this to be unnecessary to protect the integrity of the SAC and its qualifying

features:

- b. On other sites of between 0.5 hectares and 1 hectare, SuDS schemes should include at least two forms of naturalised filtration; and
- c. On other sites of less than 0.5 hectares non-naturalised SuDS e.g. permeable paving will be considered where justified.

We would also request that the following wording is added into sub-bullet 2 somewhere, ideally as bullet d. 'be provided as part of any application for outline or full planning permission.' This phrase is included in the specific site allocations when referring to SuDs. It is important that SuDS are developed and planned early on in developments to ensure that sufficient space is provided for appropriate water management on site, to reduce flooding elsewhere and to protect sensitive receiving waters. In addition if this sub-bullet was a part of Policy DM6 then potentially that additional wording would not need to be included in each site allocation as it will be inherent in Policy DM6.

- 2. In order to reduce flooding and maintain water quality (in accordance with DM8) SuDS schemes should:
- a. be designed and monitored in accordance with the CIRIA C697 C753 SuDS Manual or equivalent national or local guidance,

noting that all receiving waters in the Borough should be classified as protected waters;

b. manage surface water runoff as close to its source as possible and include at least three forms of naturalised filtration

within the treatment train wherever feasible;

## c. ensure that discharge rates are reduced as far as possible and that on greenfield sites these should at least mirror

## greenfield rates before development

d. be provided as part of any application for outline or full planning permission.

We have no other comments to make. If you have any queries regarding the above please do not hesitate to contact us.

Kind regards Laura

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