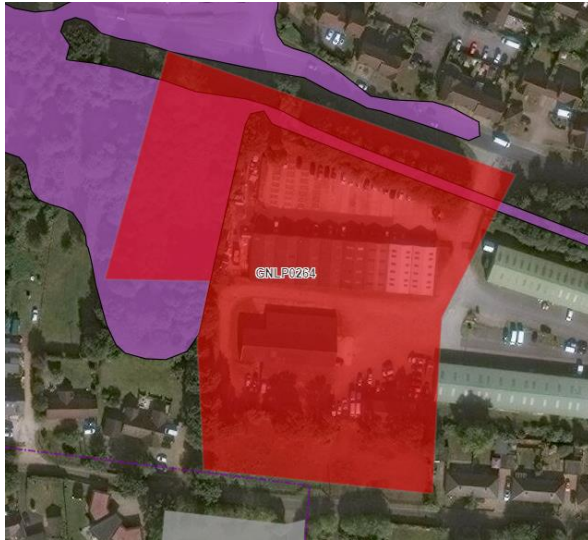


Note on Site GNLP0264, Land at Dog Lane, Horsford

Area of the site in Flood Zone 2

- Approximately 0.40 hectares of the site is in Flood Zone 2 as shown by the purple shading on the map below:



- On that basis the partnership would suggest that the size of the allocation should be reduced by 0.40 hectares to 1.38 hectares and the allocation boundary re drawn to exclude the flood risk area.

Impact of 20 metre buffer required by the Environment Agency

- Contact has been made with the Environment Agency who have given some further information about the context for the buffer and their view that 20 metres is fairly conservative. It is their view that the policy wording should be retained. The detailed comments received from the Environment Agency are as follows:

'The 20 m distance was prescribed as a minimum distance to allow the river space for natural function e.g. floodplain habitats, transition from wet to dry habitats. Also if this strip of the riparian buffer was developed there is then little opportunity in future for restoration of river habitats. Works would normally involve machine access and space to work.'

If gardens are allowed up to the bank top then there is little natural habitats, as people tend to garden up to the edge, with closely mown lawns and cutting down riparian vegetation – or worse using herbicides to kill off all vegetation. Rivers and associated habitats offer unique green corridors to link up isolated habitats and are often the basis for biodiversity/green infrastructure networks. If development is allowed to the edge then the opportunity is lost.

The WFD compliance assessment should review the ecological quality of the waterbody along with the hydro-morphological condition, this may identify that the waterbody needs a smaller or greater buffer to ensure that good or good potential status can be achieved.

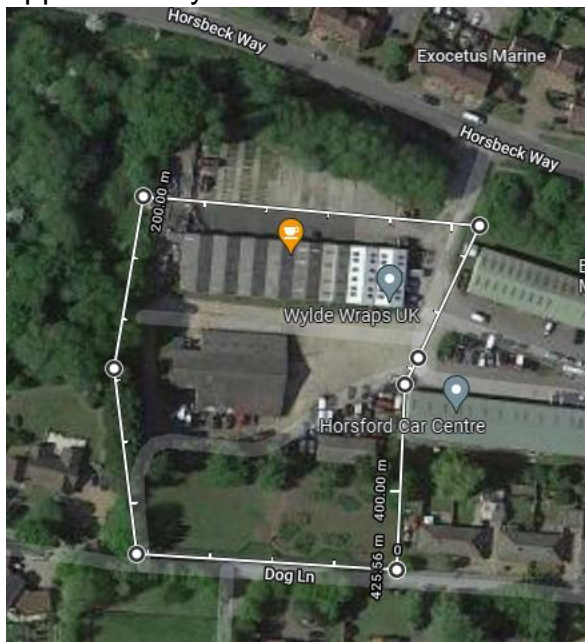
On our mapping system it shows the natural floodplain is between 90-120 m wide at the site on Dog Lane, it looks like the Beck must be deeply incised at

this point as there is little natural connectivity between the river and floodplain showing. So 20m seems quite small compared to what the natural floodplain should be'.

- As suggested by the Inspector in the Hearing Sessions the watercourse is approximately 20 metres from Horsbeck Way. In order to retain a 20 metre buffer between the watercourse and gardens this would necessitate the loss of a 40 metre strip of developable land from the northern extent of the allocation as shown on the map below:



- This suggests that the developable area of the allocation is actually approximately 1 hectare as shown below:



- The partnership would suggest that rather than the 45 dwellings currently in the policy the site could realistically accommodate nearer to 30. A slightly higher density has been assumed to reflect the brownfield nature of the site.
- The partnership would suggest that the northern area is retained within the allocation as this is covered by policy requirement 3 which is related to the need for a buffer between the watercourse and gardens. Additional wording should be included within the policy or supporting text as appropriate to reflect that the developable area of the site is approximately 1 hectare.