

Flood Risk and Water Management

Introduction

This Hearing Statement has been prepared by Stop350 and should be read in conjunction with the representations made to the Publication Draft Plan 2017.

Stop350 is a community based group that arose because of concerns about the CLP. Stop350 is authorised by individuals to act on their behalf. These representations come from over 1,100 people formed by a combination of residents of Mersea Island and close surrounding area.

We support sustainable development and recognise the need to plan for appropriate growth. We are engaging in the examination process in a constructive manner and appreciate that our role is to assist the Inspectors in deciding whether the CLP is Sound and, where necessary, to identify how the CLP could be made to be Sound.

In light of the regrettable significant passage of time between the consultation on the Publication Draft Plan and the Examination – some 4 years – we have updated the evidence which we rely upon in assisting the Inspectors in examining the CLP. This is set out where relevant in our statement.

- **Are the Flood Risk and Water Management, Sustainable Urban Drainage Systems and Renewable Energy, Water, Waste and Recycling policies justified by appropriate available evidence, having regard to national guidance, and local context, and CLP 1?**

In answer to the Inspectors question we broadly support the policy, but development at Mersea Island cannot meet the policy requirements.

First part of DM23

Policy DM23: Flood Risk and Water Management

The Local Planning Authority will seek to direct development away from land at risk of flooding in accordance with the National Planning Policy Framework and the Planning Practice Guidance. Sites proposed for allocation in the Local Plan have been considered sequentially with respect to flood risk. The Sequential Test will be applied to planning applications for new sites coming forward that have not been allocated through the Plan.

Development will only be supported where it can be demonstrated that the proposal meets flood management requirements in the NPPF, the PPG and policy DM23.

Development proposals will be required to deliver or contribute to the delivery of flood defence/protection measures and/or flood mitigation measures to minimise the risk of increased flooding both within the development boundary and off-site in all flood zones and to ensure that the development remains safe throughout the life of the development. Proposals that include measures to enhance the flood resilience of new or renovated buildings will be encouraged, particularly in areas with a history of local flooding.

15.124 National policy categorises zones of flood risk as Zone 1 (low probability), Zone 2 (medium probability), Zone 3a (high probability) and Zone 3b (functional floodplain). These flood zones are defined in Table 1 in the National Planning Practice Guidance and are shown on the Environment Agency's Flood Map for Planning (Rivers and Sea). The Environment Agency have also produced the updated Flood Map for Surface Water. Both are available on the GOV.UK website.

15.125 The overall aim of national policy and guidance on flood risk is to steer new development to land with the lowest risk from flooding (Flood Zone 1) as a priority and to ensure that the development being proposed is compatible and safe over

its lifetime relative to the Flood Zone it will be located in. Table 2 of the Planning Practice Guidance sets out a flood risk vulnerability classification for different land uses while Table 3 provides a 'compatibility' table for specific land uses in the different flood zones (including in Flood Zones 3a and 3b).

15.126 It is important that flood risk is assessed early in the plan making process. National policy/guidance requires the production of Strategic Flood Risk Assessments to enable flood risk from all types of flooding (including an allowance for climate change) to be considered at a strategic level. The SFRA is the key piece of evidence used to allocate land in the Local Plan. The NPPF and PPG also requires Local Planning Authorities to adopt a sequential approach when allocating development sites in their Local Plans relative to their flood risk, flood vulnerability and proposed use.

15.128 Flood risk was considered early in the site selection process in the Colchester Local Plan. As part of the site assessment process (SLAA), greenfield sites where more than 50% fell within flood zone 3 were immediately ruled out. On completion of the SLAA, the Local Planning Authority commissioned a Strategic Flood Risk Assessment (SFRA) for Colchester. The SFRA was then used to apply the Sequential and Exceptions Test (where necessary) to assist the allocation of development sites in the emerging Local Plan.

The requirements of this policy for Flood Risk has not been properly assessed or mitigated throughout the Emerging Local Plan for the unique position that Mersea Island is situated within.

Earlier Matter 3 has already highlighted have covered the problem of Flood risk to both access, flooding, erosion and tidal surges upon the Island.

Whilst most of the developed part of the Island is not at the highest risk of flooding, it is the access to and from the Island which is at risk of flooding.

We do not believe that this Policy has been considered in the context of Mersea Island and therefore we contend the policy is unsound.