

## **FoDDC September 2016 Keynote for Allocations Plan**

### **Allocation Plan Policies and flood risk.**

- 1) This note relates the policies in the Forest of Dean Allocations Plan publication version to the assessment of flood risk. It applies the principles of the sequential test to the proposed allocations.
- 2) The following table is a summary of the AP policies and known flood risk, indicating which sites are wholly or partially in flood zones, which are potentially affected by risk of surface water flooding. Also considered are the proximity and potential impact of watercourses.
- 3) The policies in the AP can be divided into those that allocated land for development and those that do not. Of the latter some protect particular sites and a few are not site specific and provide guidance which applies over the whole district. Of the policies that identify land for development many are written to protect existing uses such as employment and make clear that addition or continued employment use would be supported by the plan. There are a number of policies that relate to undeveloped land or which propose or enable uses that are different to those that exist at present.
- 4) Of the allocated sites where new and different uses are allocated, some relate to land that has been the subject of planning permissions and some have current consents. The plan includes in its allocations land which has planning consent unless the development has commenced in which case the development is regarded as a firm commitment and would be supported as such. Some allocated sites may have permissions which have lapsed, and these too are regarded as commitments.
- 5) Many of the proposals themselves cover sites that are already developed and where the purpose of the policy is either to retain a particular use to enable it to evolve or alternatively to allow a complete change. These sites are in a wide variety of locations and some are in use and are potentially affected by flooding. Here the allocation seeks to reduce where possible the level of risk. Some allocations are for uses that can exist in areas that may flood and no further action is required. Where the policies relate to existing sites there is no option to identify alternative land and although the policy could be deleted it would potentially lessen the degree to which the site may be able to be regulated.
- 6) In order to provide for the needs of the area a number of new presently undeveloped sites are allocated and these are also assessed below in respect of known risk. Again the uses proposed cover a range, some of which are more acceptable given the identified risks. Some policies allocate land where particular measures are likely to be necessary or where the sites themselves are constrained.
- 7) As a background to the Plan there is the 2005 Local Plan which sought to identify and promote development over a long period. As much of this has yet to be completed the AP has re assessed the appropriateness of sites for development and has endorsed many of the sites that were identified in

the previous plan. Of these a large number have recent planning permissions and as a consequence have been the subject of detailed study in relation to flood risk. Where permissions exist it is assumed that the development covered is acceptable.

**Policy review.**

- 8) The policies in the AP are intended to work in conjunction with national policy and also those contained in the CS. CSP1 and CSP2 both bring tests in conjunction with possible flood risk. CSP1 is more general and makes clear that development must take account of potential flood risk. When assessed such risk may prove to be unacceptable, able to be mitigated or may be shown not to be a risk to the particular development proposed. This depends on the type of development and the nature of the risk(s) being considered. Development that is not able to be satisfactorily accommodated under the terms of CSP1 will not be permitted and that would include cases where satisfactory mitigation of flood risk could not be provided.
- 9) For the AP it is necessary for the sites proposed to be allocated to be able to be developed for the intended purpose, and this may be possible only with appropriate mitigation and after taking account of other constraints which may impose particular requirements. Individual sites vary and are discussed below.
- 10) The table summarises against each of the proposed policies in the AP the position in respect of known flood risk. Its purpose is twofold, firstly to demonstrate that the allocations are capable of being implemented and secondly to flag any additional studies or special measures that may be necessary in order to implement the AP's proposals.

It contains information summarising the following:

- Whether the site concerned is in a floodzone and if so the extent and nature of the indicated zone. This uses EA information including the basic extents of flood zone 3 which is plotted on the AP proposals map.
- Whether the site concerned is considered vulnerable to surface water flooding and the indicative scale. This uses information supplied by the EA to the Council.
- Whether the site is within a recorded aquifer, or ground water source. This is based on information from the EA
- Proximity to watercourses

Note: known constraints due to infrastructure capacity are recorded in the IDP and in the SA.

- 11) Policies AP1-8 are not site specific and will not have any direct impact on flood risk. The subjects they consider may have an indirect effect for example green infrastructure may include features that both mitigate risk and add to the biodiversity of an area. Development that increases flood risk is unlikely to be able to be regarded as sustainable.

- 12) AP 9 protects land so that the reinstatement of the Herefordshire and Gloucestershire Canal can take place. It will need to be the subject of separate assessments and permissions and may have a beneficial effect on flood risk or at least be neutral. Policy AP 10 is concerned with a small area of land that has to be protected where it is for the Dean Forest Railway.
- 13) AP13 and 14 protect landscapes and flood risk is not relevant.
- 14) A group of policies for development not associated with settlements follows and these are considered in the table below. Where there are potential issues they are identified and although some sites will require additional assessment, the policies are considered able to be implemented. AP17 (Land at Stowfield) is a policy that enables development and is conditional on whatever is proposed (within the scope of the policy) being able to demonstrate that it can satisfactorily take place. The site is currently developed and is identified as suitable and appropriate for a variety of uses subject to satisfactory additional evidence regarding possible flood risk and ecology.
- 15) Some sites that are allocated are the subject of unimplemented planning permissions. Where this is the case the allocation invariably supports development of the nature that is the subject of these permissions and also assumes that the granting of them means that any of the issues considered in this document have been resolved. This is likely to be the case where the development which eventually takes place is within the scope of the permissions at the time of assessment. Where development of a different character is proposed then there may be a need for additional studies or in some cases proposals may not be acceptable or may need to be modified.
- 16) AP26-29 relate to cycle routes though only one policy identifies a specific route. All will be subject to the need for additional studies at the planning application stage.
- 17) The remaining policies in the table below are all specific to locations and any necessary constraint or need for additional investigation which can be identified from the available information has been recorded.
- 18) In considering the suitability of sites for development and where there may be an identified risk, it is often necessary to apply a sequential approach in order to ensure that there are no more suitable locations where the risk may be less (acceptable). The test should help ensure that new development does not take place in unsuitable locations. Beyond the sequential approach and “test”, it may be necessary to apply an exceptions test to proposals where there is no reasonable alternative location or where there are benefits that outweigh the risk. (see NPPF 100-104)
- 19) Some policies for development apply to areas already developed and where these are allocated for a continuation of a similar use to that which is current, then development will be expected to reduce flood risk when it takes place. Where changes in the use of previously developed land are allocated, the revised uses will be expected to be suitable for the location, though this may involve further evaluation of any risk and suitable mitigation. Inevitably some of the areas identified, most notably town centres are the only locations where particular development may be

considered. Two town centres, Newent and Lydney are affected in this way and in both, the main shopping area is in part in an area at risk from flooding. The AP makes allocations in these areas and comments on the need to take full account of the risks identified.

- 20) All sites identified in the AP have been carefully considered and this includes the evaluation of the proposed development against any known flood risk. Many locations have been discounted for various reasons and some policies have been changed to ensure that they can be developed in the way in which they are allocated. This has led to the modification of some of the draft policies and the exclusion of some areas from the initial consideration of whether they are suitable. As a result the AP sites, including those that are not currently developed are all considered to be suitable for the intended purpose. Some presently undeveloped sites are affected to a limited degree and others not at all. Those that are affected or may be potentially affected to a limited degree are considered in greater detail below.
- 21) A strategic Flood Risk Assessment for the area (SFRA Level 1) and more detailed work for Lydney and parts of Cinderford (SFRA level 2 studies or equivalent) have been used to inform the Plan, together with other information such as particular studies for Coleford, Newent and Longhope have in addition to the above been used to inform the Plan.
- 22) Coastal locations can be especially vulnerable to development pressures and the Local Plan generally avoids allocations except at Lydney that may have a direct impact on the coast. In the case of Lydney however the majority of the development is committed or involves land already developed and all are subject to the process of SA and HRA the latter paying particular attention to the need to ensure that the plan will protect the identified interests. The district is not generally at risk from coastal change.

Proposed allocation by Main Modification	Flood Zone	Surface water	Aquifer	Source	Ground Water	watercourse	
Clanna Rd, Alvington	no	Med less		no	minor	no	Recent planning application resolved that there was a need for measures to address run off because of a known surface water flooding issue.
Ruspidge St Whites Sneyd access	no	no		1	major	no	Source protection and groundwater vulnerability issues identified as recently developed site adjoining
Milkwall Ellwood Rd	no	no		2	major		Major groundwater vulnerability and source protection zone 2
Worcester Walk Broadwell Coleford	no	no		no	minor		Minor groundwater vulnerability
Kings Meade Coleford adj golf club	no	Less inter		no	minor		Edge of site affected by SW issues
Worcester Walk Broadwell Coleford Machen Rd	no	no		no	minor		Minor groundwater vulnerability
Poolway Farm 2	no	no		no	minor		Minor groundwater vulnerability
Worcester Walk 2	no	no		no	minor		Minor groundwater vulnerability
Adj RFC Drybrook	no	less		No	minor		Marginally affected by SW issue, minor GW vulnerability
Allaston Lydney southwest	no	no		No	minor		Minor groundwater vulnerability
Allaston Lydney southeast	no	no		No	minor		Minor groundwater vulnerability
Mitcheldean Coach Depot	no	no		no	minor		Minor groundwater vulnerability
Cleeve Mill Lane Newent	no	no		no	major		Major groundwater vulnerability
Southend Lane North Newent	no	less		no	major		Major GW vulnerability, very minor SW issue
Newnham North phase 2	Adj 2 and 3	no		no	no		Adjoining highway affected by Zn 3 and Zn2 flood risk
Newnham North 3	Adj 2 and 3	no		no	no		Adjoining highway affected by Zn 3 and Zn2 flood risk
Staunton Chartist Way	no	no		no	no		
Redmarley Drury Lane	no	no		3	major	no	Source protection zone 3 major gw water vulnerability
Yorkley	no	no		no	minor		Minor groundwater vulnerability