

Ms. Tina Kelly – Programme Officer
c/o: Telford & Wrekin Council
Development Management
PO Box 457
Wellington Civic Offices
Telford
TF2 2FH

Our ref: SV/2012/106308/CS-
03/EW1-L01
Your ref:
Date: 27 October 2016

Dear Madam

TELFORD & WREKIN COUNCIL LOCAL PLAN EXAMINATION

I write in connection with the forthcoming Telford and Wrekin Council Local Plan Examination and, specific to matters within our remit, the approach taken with regards flood risk management. The Environment Agency is a statutory consultee and have been engaged in on-going dialogue with Telford & Wrekin Council from the outset, through various iterations of the Plan, and the associated evidence base, in order to make it sound.

The importance of an up to date and robust evidence base is supported by the National Planning Policy Framework (NPPF). Paragraph 158 of the NPPF requires demonstration of a “proportionate evidence base” and ensure that “the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.”

We therefore worked with the Planning Policy Team at Telford & Wrekin to ensure that all forms of flooding were fully taken into account as part of the plan making process. This evidence base would inform site allocations for residential and employment and to subsequently inform future waste and mineral sites. The need for this evidence is supported by the NPPF and NPPG to help avoid inappropriate development in areas at risk of flooding.

In consideration of the above, and Question 7.6 of your Draft Matters, Issues and Questions Paper, I would offer the following comments at this time.

The question asks whether the Local Plan’s Approach to flood risk management, including the allocation of sites for development, is sufficiently justified with reference to up-to-date evidence and consistent with national policy.

Planning Practice Guidance (Taking flood risk into account in the preparation of

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Local Plans): Paragraph 005 (Reference ID: 7-005-20140306) outlines how the Local Plan should consider flood risk matters, with reference to a Sequential Approach and the need for a robust evidence base i.e. Strategic Flood Risk Assessment (SFRA).

Specific to Telford & Wrekins Local Plan (Policy ER12 – Flood Risk Management) there is a requirement for development to be located in accordance with the Sequential Test and Exception tests along with the SFRA and Local Flood Risk Management Strategy. This flood risk sequential approach has also informed the allocations within the Plan, amongst other matters outside of the Environment Agency remit, to ensure that development is located in areas of the lowest level of flooding. Where sites do have a portion of flooding associated with them the Land Drainage team have assessed the sites and confirmed that a sequential approach can also be applied within the boundary of the site to ensure all built development is located within Flood Zone 1, the low risk Zone.

SFRA update: The NPPG states that “When approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available”.

Telford & Wrekin have previously produced both a Level 1 and 2 SFRA (2007 and 2008 respectively) but it was felt that this SFRA evidence base needed to be updated in consideration of the proposed growth throughout the plan period and to better sync with the Local Plan submission and allocated sites that were not picked up in those documents.

On the 2 November 2015 we received a Phase 2 SFRA Addendum which provided an updated assessment of the allocated sites not addressed in the 2008 SFRA along with documenting roles and responsibilities since the introduction of the Flood and Water Management Act 2010 and the creation of Lead Local Flood Authorities (LLFA).

The updated SFRA, in conjunction with the recently produced Local Flood Risk Management Strategy, offers a comprehensive suite of information on all sources of flooding throughout the borough and demonstrates how Telford & Wrekin can sustainably accommodate growth over the plan period.

Climate change: In February of this year the Environment Agency released updated guidance on how climate change could affect flood risk to new development. This was introduced to help ensure that new housing, and other development, remain safe and resilient to flooding, without increasing flood risk elsewhere. This was discussed with Telford & Wrekin Council at that time as they were in the advanced stages of their final submission at this time.

We confirmed that, in instances where local plans, and the associated evidence base, are well advanced, the application of these updated allowances could significantly slow down completion or add to costs. We would therefore, other than particularly vulnerable or sensitive locations, continue to base our advice on the existing allowances. Therefore we did not request the Council to further revisit the SFRA in consideration of the updated allowances. However, we did recommend that the Councils Land Drainage Team provide confirmation that the updated allowances would not impact upon the delivery of the allocated sites.

After reviewing the new Climate Change guidance the Land Drainage Team confirmed that, whilst three of the allocated sites do have areas of Flood Zone 3 (High Risk) associated with them, the increased allowances would not impact upon their ability to

accommodate the required housing numbers/employment use. Policy ER 12 of the Local Plan has included reference to the updated Climate Change guidance to ensure that the document contains the most up-to-date evidence and is consistent with national policy and associated guidance.

Conclusion: The Local Plan, as stated above, provides a robust and comprehensive evidence base with regard to matters of flood risk management. The Plan is supported by an up to date Strategic Flood Risk Assessment (SFRA) whilst the latest Climate Change guidance has also been factored to ensure that the allocated sites are suitable for development.

Yours faithfully

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