

Standard Response to Issues Raised in Consultation on the Revised Draft Adur Local Plan 2013

Flood Risk and Drainage

Introduction

Many respondents to the recent consultation on the Revised Draft Adur Local Plan 2013 raised concerns in relation to flooding and drainage issues, particularly in relation to the proposed strategic allocations at New Monks Farm (Policy RD 5), West Sompting (Policy RD6), and Shoreham Airport (Policy RD 7). This paper clarifies national planning policy, and policy requirements as set out in the Revised Draft Adur Local Plan 2013.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) Technical Guidance document (available on the CLG (Communities and Local Government) website) defines the following flood zones. These flood zones refer to the probability of river and sea flooding, ignoring the presence of flood defences.

- Flood Zone 1 – low probability.
- Flood Zone 2 – medium probability.
- Flood Zone 3a – high probability
- Flood Zone 3b – the functional floodplain

It should be noted that if a site is located within flood zone 2 or 3a, it can still potentially be developed subject to passing the Sequential Test in the case of flood zone 2, and the Sequential and Exceptions Test in the case of flood zone 3a. However, with regard to flood zone 3b, nearly all forms of development are prevented in this zone other than water compatible development and essential infrastructure.

Para 99 of the NPPF states that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that the risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

Para 100 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a

sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

Para 102 states that if, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both elements of the test will have to be passed for development to be allocated or permitted.

Proposed Allocation at West Sompting: flood risk

The allocation proposed by RD Policy 6: West Sompting of the Revised Draft Adur Local Plan 2013 is entirely located within flood zone 1 (low probability of fluvial and tidal flooding). There is an area of functional floodplain (flood zone 3b) in the area of the Cokeham Brookes SNCI but this area lies outside of the development boundary. Due to the topography (close proximity to the South Downs) and the geology (chalk) of the area, the site is susceptible to surface water and groundwater flooding. A flood risk assessment would be required at the planning application stage to ensure that surface water and groundwater can be effectively dealt with.

Neither the Environment Agency, West Sussex County Council (in their role as Lead Local Flood Authority) nor Adur & Worthing Council's engineers have raised concerns regarding flood risk issues at West Sompting.

Proposed Allocation at New Monks Farm: Flood Risk

With regard to fluvial and tidal flooding, the allocated site at New Monks Farm, Lancing is predominantly located within flood zone 3a (high probability) with parts in flood zone 1 (low probability) and 2 (medium probability). The site has passed the Sequential Test as set out in the National Planning Policy Framework (NPPF) and is

therefore considered to have development potential. Part 1 of the Exceptions Test has also been passed and further work is currently being undertaken in respect of Part 2 of the Exceptions Test. To view the Sequential and Exception Test for the Revised Draft Adur Local Plan 2013, please go to the following link:

<http://www.adur-worthing.gov.uk/media/media,117744,en.pdf>

Parts of the site are also susceptible to surface water flooding and groundwater flooding and these two types of flooding have recently caused significant issues in the area. Adur District Council are working with the landowners, West Sussex County Council (as the Local Lead Flood Authority) and the Environment Agency to ensure that not only is any new development on site is not at risk of flooding but that flood risk is not exacerbated elsewhere. Additionally, opportunities to improve flood risk for the surrounding area are also being explored by the relevant parties. This work is still ongoing.

Shoreham Airport

Shoreham Airport is currently located within flood zone 3b (functional floodplain) due to a high level of risk from fluvial and tidal flooding. The site also has a high susceptibility to groundwater flooding and there are also surface water issues on site. The construction of the Shoreham Tidal Walls Project led by the Environment Agency would reduce the impact of tidal and fluvial flooding at the airport and would result in a change in the flood zone of the airport from 3b to 3a (high probability). On this basis, the airport would pass the sequential test as set out in the NPPF. Adur District Council are working with the landowners and leaseholders as well as West Sussex County Council (who are the Local Lead Flood Authority) and the Environment Agency to ensure that not only is any new development on site not at risk of flooding but that flood risk elsewhere is not exacerbated.

In addition to the site specific policies, the Revised Draft Adur Local Plan also contains a specific policy on flood risk – Policy 36: Flood Risk and Sustainable Drainage which sets out when a flood risk assessment is required, what the assessment needs to demonstrate, and the requirement for Sustainable Drainage Systems (SuDS).

Conclusion

The proposed allocations within the Revised Draft Adur Local Plan 2013 were assessed and selected in accordance with the National Planning Policy Framework, and Sequential and Exceptions Test. Ongoing work is being undertaken to assess impacts on surrounding areas, and whether these impacts can be mitigated. The Council will not take forward sites unless it can be demonstrated that flood risk can be mitigated and that flooding will not be worsened elsewhere as a result of the development.