

## TAN15 and Infrastructure paper

- a) **Can the Council explain in more detail the nature and scale of the flood constraint at allocations ref PrC1/h12 and PrC1/MU1 and how this risk will be addressed.**

### **PrC1/MU1**

The site is a very large mixed-use area, and the elements of the site subject to fluvial flooding constraints have been excluded from being developed in the masterplan and developable areas as set out in the adopted Planning & Development Brief. The site has a history of housing delivery and several valid planning permissions.

The extents of floodzone 2 and 3 for rivers and sea are well constrained to the river corridor. It should therefore be possible to wholly locate built development in flood zone 1.

### **PrC1/h12**

When allocating the site, it was outside the C2 flood zone in the DAMs. However, the site is now identified as being in Flood Zone 2 for rivers according to NRW's FMfP. This represents an updated position from the previous FMfP and the SFCA and affects a significant element of the site.

In relation to the risk of flooding identified in the FMfP as a material consideration, it is duly noted. Any planning application to deliver the site will be required to have regard to the FMfP and should be accompanied by appropriate evidence including a detailed FCA.

- b) **In order to ensure consistency, can the Council please revise the Schedule of Housing Allocations (AP2/5) to include details of the flood zone under 'Flood Risk' and details of constraints, mitigation and requirements at application stage under 'Key Considerations and Constraints'.**

The revisions to the Schedule of Housing Allocations is linked and considered with the Council response to Hearing Session 2 – sent to the Programme Officer on the 22<sup>nd</sup> August.

- c) **Can the Council please amend the schedule of Employment Allocations (AP4/2) to include details of the flood zone, constraints, mitigation and requirements at application stage under.**

The amendments to the schedule of Employment Allocations (AP4/2) is linked and considered within the Council response to HS4 – sent to the Programme Officer on the 28<sup>th</sup> August.

- d) To provide clarity about the requirements of the revised TAN 15, can the Council provide a brief note outlining that approach to be taken to development proposals within flood zones 1 – 3 (Surface Water and Small Watercourse)**

A Flood Consequences Assessment is required for any development proposal located fully or partly in Surface Water and Small Watercourses - Flood Zones 2 and 3

An assessment should also be undertaken for development on sites outside of these zones, but which has the potential to affect the course of surface water and/or excess water from ordinary watercourses. The Council would ensure any new development adjacent to Flood Zones 2 and 3 for Surface Water and Small Watercourses is appropriately set back to allow for extreme flood events.

Surface water and ordinary watercourse flood risk management are the responsibility of Lead Local Flood Authorities (LLFAs). The LLFA has an important role in advising on surface water and ordinary watercourse flood risks for its area. The Council will seek the LLFA's views on planning applications where surface water and ordinary watercourse flood risk is potentially a reason for refusal or where the risk is proposed to be managed or mitigated through appropriate site design. In this respect the SPG on Flood resilience will consider how it can be managed through design solutions.

Furthermore, the Council's approach would be that proposals within Zone 1 for surface water will need to submit a drainage statement and a SuDS application, and for proposals within Flood Zones 2 and 3 for Surface Water it would be required to submit an FCA and a Drainage statement along with a SuDs application.

- e) Can the Council amend the TAN 15 review of allocated sites to include a review of the additional sites that were consulted on early this year, and**

The TAN15 review of allocated sites was sent to the Programme Officer on the 22<sup>nd</sup> August.

- f) Once this above are completed / agreed, we suggest that an addendum, which should include the requested note on the flood zones 1 – 3 (Surface**

**Water and Small Watercourse) and the amended review tables, is to supplement the SFCA. Is this acceptable?**

Yes. The Council maintains that the SFCA is a robust assessment of flood risk in relation to the LDP's sites and allocations and is to be supplemented by the TAN15 review tables which reflect the latest version of the Flood Map for Planning, and the note above relating to Surface Water and Small Watercourses.