

Babergh Development Framework

Core Strategy (2011- 2031) Submission Draft

(Part 1 of Babergh's New Local Plan)

Technical Background Document 6: Flood Risk

Version 1.2 (27 October 2011)

1. Introduction

- 1.1 This Technical Background Document supports the Core Strategy (2011 - 2031) Submission Draft - Part 1 of Babergh's Local Plan. The principles of sustainable development are at the core of the planning system. This has been reinforced during preparation of the Core Strategy Submission Document with publication of the draft National Planning Policy Framework (NPPF) in July 2011. The Core Strategy aims to strike an appropriate balance between the three elements of planning for prosperity, planning for place, and planning for people. There are some key local considerations which have a particular bearing on this balance such as: the dispersed rural nature of the district; the environmental sensitivity of the district (particularly the Stour and Orwell estuaries); the estuary coastline; the character and fabric of historic towns and villages; the attractions for the district for tourism; the changing nature of work and potential for employment growth; the need for new homes; and need to address all of these considerations within the context of climate change.

This paper provides further detail on:

- The Council's approach to Flood Risk, with regard to the requirements of PPS25
- Particular comment on the Brantham strategic site

2. The Planning Policy Statement 25 ("PPS25") approach to Flood Risk

- 2.1 The aims of national planning policy on development and flood risk are to ensure that the issue is taken into account at all stages of the planning process, to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Exceptionally, where new development is necessary in such areas, policy aims to make it safe, without increasing flood risk elsewhere and where possible, reducing flood risk overall.
- 2.2 A Sequential Test is devised, and this requires that all development should be positioned in locations least likely to suffer from flooding. This applies to employment land as well as residential. If suitable sites are not available within localities for development, in certain circumstances an Exception Test may be applied, to see if a site with some risk of flooding is acceptable for a particular development.
- 2.3 PPS25 requires that flood risk assessment should be carried out to the appropriate degree at all levels of the planning process, to assess the risks of all forms of flooding to and from development, taking climate change into account and to inform the application of the sequential approach.

3. Babergh's response to PPS25 in the preparation of its Draft Core Strategy

- 3.1 A Strategic Flood Risk Assessment has been carried out as part of the background work to the preparation of the draft Babergh Core Strategy. This document can be found on the Council's website, and was prepared by JBA Consultants of Wallingford, in 2009.
- 3.2 The SFRA advised that the Sequential and Exception tests should be applied on individual sites and set out advice for certain categories of development. Detailed advice was also set out for the Development Control process.

4 The Distribution of (Residential) Development within the draft Core Strategy

- 4.1 Analysis suggested a need to provide for an additional 2,500 dwellings over the Plan period of 2011 – 2031, on top of the existing unused commitments of 2,723 – see table below, extracted from the Draft Strategy. Three "New Directions of Growth" were identified in Sudbury / Gt Cornard (850 dwellings), Hadleigh (250 dwellings) and the Ipswich Babergh Fringe (350 dwellings). The sites themselves are "broad areas for growth" and whilst there are floodzones within them, they do not impact significantly upon the areas available for development – areas with any liability to flooding can be avoided at site planning stage.

Number and Distribution of New Homes

In addition to existing commitments and a "windfall" figure of 750 for the second half of the plan period (2021 – 2031) provision will be made for 2,500 new dwellings to be built in the following locations:

<i>Location</i>	<i>No of Dwellings</i>
Sudbury and Great Cornard	850
Hadleigh	250
Ipswich Fringe	350
Brantham Regeneration and Core & Hinterland Villages	1,050
Total	2,500

- 4.2 The Council has updated its Strategic Housing Land Availability Assessment as supporting evidence for the Draft Core Strategy. The site sieving process took into account flood risk and a healthy surplus of available sites over projected need was still clear. There is sufficient land to avoid development within the flood zones, with the exception of the Brantham site – see below.
- 4.3 The Brantham site. However, a fourth area at Brantham does raise such flooding issues. This is a former wholly Industrial site in an estuarial location. The draft Core Strategy puts this site together with Core and Hinterland villages, and allocates 1050 dwellings for these combined areas
- 4.4 The Brantham site raises very particular issues of regeneration. Much of the site is derelict, with buildings in need of demolition and land in need of decontamination. However, there is a significant and apparently thriving remaining operation by ITW Ltd, known as Imagedata, which has been the subject of investment in recent years.

- 4.5 The site is partly crossed and partly abutted by the main London Liverpool Street to Norwich rail route, and has estuarial frontages. The industrial site is separated from the main village by Greenfield land within the same ownership. Adjacent land is designated as an Area of Outstanding Natural Beauty and as a Site of Special Scientific Interest. The intertidal mudflats and saltmarsh nature of the adjacent Stour estuary means that the area is also protected as a Special Protection Area (SPA) under the 1979 EU Birds Directive and Ramsar designations under the 1971 Ramsar convention. Unsurprisingly therefore the tongue of land to the south of the railway is of wildlife significance.
- 4.6 Parts of the area are subject to flood risk, and it is acknowledged that proposals for development will be required to comply with PPS 25: Development and Flood Risk (or any successor policy documents), including the preparation of a detailed Flood Risk Assessment and sequential test (as appropriate).
- 4.7 It is acknowledged that there are challenges and constraints to regenerating this site, but doing nothing is not an acceptable option, particularly where so many local jobs have been lost. Brantham village underwent significant growth in the 1960s and 70s, at the time related to the industrial operation, but now that much of the employment area has gone the village would benefit from a degree of re-focussing and adjustment to its new role.
- 4.8 The site is now ripe for a major regeneration scheme, in accordance with the principles laid down in the adopted Local Plan policy EM06 (and/or related saved Local Plan policies) and the Council's Planning Position Statement of 2008. It will be expected that green infrastructure will be central to the character and layout of such a scheme in accordance with Policy CS10 (particularly with regard to providing mitigation within the proposed development for potential recreational impacts on the SPA and Ramsar site), and that it will deliver new employment buildings, new dwellings and improved community facilities proportionate to the amount of development permitted, all in accordance with an agreed Master Plan. A high quality development will be sought, particularly in the event that riverside development is sought.
- 4.9 The masterplan and mitigation strategy will need to ensure that direct and indirect negative impacts on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site are avoided. In particular, provision of alternative Natural Green Space will be required, in line with the Haven Gateway Green Infrastructure Strategy, so as to avoid potential harm to the natural areas that form part of the SPA. Provision and funding for the green infrastructure will be provided by the developer(s). It is anticipated that the green infrastructure provision would include creation of a new Public Open Space, for which the design and management plan should aim for a quality suitable for designation as a Local Nature Reserve.
- 4.10 The extant Local Plan (June 2006) policy EM06 opened the door to a "balanced form of mixed use development", including an "appropriate level of residential development and community facilities" on this site. The Council's published Brantham Industrial Area Planning Position Statement 2008 again confirms that the provision of appropriate residential development is a key component in the regeneration of this complex site.
- 4.11 Thus the principle of mixed use including residential development has been established within the development plan for Babergh for over 5 years, and the relevant Local Plan policy EM06 is currently "saved". Advancing this development is accorded high priority within the Council, and regular Project Team meetings are held with the landowner/developer, the Haven Gateway Partnership and the Homes and Communities Agency, to carry things forward.

5. The Approach to Flood Risk on the Brantham site

- 5.1 Notwithstanding the extant commitment to the development of this site for uses including residential, it is acknowledged that the production of a Core Strategy necessitates compliance with PPS25 advice on flood protection and flood risk management.
- 5.2 The SFRA of 2009 confirmed that the larger part of the site covered by Local Plan policy EM06 is within Flood Zone 3, and has a risk of surface water flooding (site maps and summary sheets within appendix D). The likely effects of breaches in the flood defences are modelled within the document (Cattawade – appendix C). An FRA will be needed as part of any development proposals, and much of the preparatory work has already been carried out by the developer.
- 5.3 Para 4.36 et seq of the PPS25 Practice Guide sets out the approach to be taken in applying the Sequential Test to areas requiring redevelopment or regeneration. Whilst this may be modified to some degree by the forthcoming National Planning Policy Framework (NPPF), the current policy framework must be followed at present, with the NPPF a material consideration. The following points are relevant:
- Redevelopment is required on this site to maintain (and improve) the sustainability of the local community, which has suffered in recent years (para 4.37 refers). The existing brownfield site is an underused eyesore which contributes very little to and detracts significantly from the locality.
 - Flood risk has been fundamental in discussions with the developer, who has had direct discussions with the Environment Agency (para 4.37) in formulating his proposals.
 - Redevelopment is on-going at the site, albeit that in terms of development on the site, it is at an early stage. Nevertheless the intent of the policy EM06 and the Planning Position Statement has been advanced, and so the first sentence of para 4.38 of the guidance applies i.e. “it has to be accepted that the redevelopment cannot go anywhere else, as there are no other reasonably available sites”. It can be confirmed that this is one of only two significant brownfield sites within the District, the other being on the edge of Ipswich and allocated for Employment use. The Guidance goes on to say that “regeneration should not be halted or compromised when a scheme is already partially complete”.
 - The site passes the first two parts of the current PPS25 Exception Test i.e. (a) development is required for sustainability reasons and (b) it is on previously developed land.
 - The third part of the Exception Test requires that the development will be safe and will not increase flood risk elsewhere. The detailed site layout will address these issues. It is accepted by the developer and will be required by the Council, that the flood defences will need improving and flood resilience measures designed in. Safe access and egress routes will be provided where necessary. Residual risks will be managed safely through devices such as a Flood warning and Evacuation Plan. Given that the main susceptibility to flooding is from the sea (in the form of tidal related flooding), there is not seen to be a transferred flood risk issue.
- 5.4 Thus it is the Council's view that it has done all that can be done at this stage, and that the requirements of PPS25 have been met. The whole Draft Core Strategy has been the subject of a Sustainability Appraisal by W S Atkins (available on the web site). The growth sites are also included within the Strategic Housing Land Availability Assessment (again, also available on the website) wherein flooding issues are identified, and in appropriate cases will be looked at more closely when the Site Allocations DP Document is prepared.