

East Lindsey Core Strategy 2016 – 2031 Examination

Lincolnshire County Council Written Statement

Matter 14: Inland flood risk (Policy SP16)

Main issue: Would this policy allow development other than housing to locate in flood risk areas without first complying with the sequential test? If so, is this justified and consistent with national policy? Is the policy otherwise justified, clear and effective?

Questions

SP16: Inland Flood Risk

1. In relation to flood risk, this policy does not appear to require proposals for non-residential development to satisfy the sequential test (and, if necessary, the exception test). Why not? Is this consistent with national policy and guidance? Should proposals on non-allocated sites be required to satisfy these tests? Has the sequential test been applied in a plan-making context when considering allocations for employment development?

All proposed development (residential and non-residential) should satisfy the sequential test to steer new development to areas with lowest probability of flooding unless they are sites allocated through the Sequential Test in Development Plans which do not require the test to be applied or minor development and change of use applications which do not require Sequential Test.

2. Why does Clause 3, which would allow housing development on sites that are only partly in areas of flood risk, apply only in towns?

No comment.

3. Should the reference to “foul” water disposal in Clause 6 be omitted because Clause 9 deals with foul water?

Agreed. Suggest Clause 6 deals with surface water only.

4. What is the justification for Clause 7, which would prevent connections to the combined or surface water system other than in exceptional circumstances? In support of Policy SP28 (Infrastructure and S106 Obligations) the text at paragraph 10, page 121, states “there are no issues which indicate that the planned scale, location and timing of

planned development within the District is unachievable from the perspective of supplying water and wastewater services...”. Is proposed amendment ADM31 necessary to make the plan sound? Should a similar amendment be made to Clause 5 of SP28 as suggested by Anglian Water?

No comment.

- 5. To be consistent with paragraph 103, footnote 20 of the NPPF, should Clause 11 be reworded along the lines “Where required by national planning policy, development proposals in areas at risk of flooding must be accompanied by a site-specific flood risk assessment”? (I.e. does proposed amendment ADM32 still suggest that all development proposals in flood risk areas must provide a FRA?).***

Agree in principle with the proposed statement, assuming the FRA demonstrates that compliance with sub-clauses of Para 103. For example;

- most vulnerable development is located in areas of lowest flood risk
- development is flood resilient and resistant
- safe access and escape routes are available
- residual flood risks can be safely managed and
- development gives priority to sustainable drainage