Level 2 SFRA: Flood Risk Sequential Test Paper

Assessing Flood Risk of Proposed Site Allocations

Addendum

SA1/11 North of Norcross Lane, Norcross

SA1/13 Inskip Extension

August 2018

1.0 Introduction

1.1 As part of its Local Plan evidence base, the council has published a Level 2 Strategic Flood Risk Assessment (SFRA), designed to provide a consideration of flood risk across the borough and the impacts on potential and actual local plan allocations (residential, employment and mixed use).

1.2 A key consideration is whether or not sites proposed to be allocated where there is a known flood risk issue should be held back from development and alternative sites in areas of lower flood risk allocated instead. This is in-line with national planning policy that seeks to direct development to areas of lower flood risk. The process of assessing sites to achieve this objective is known as the "Sequential Test". In addition, where a site is in an area of flood risk but the Sequential Test has been passed, it is also necessary to consider whether or not the development of the site confers sustainability benefits that outweigh flood risk matters. This is known as the Exception Test (part 1).

1.3 The council has undertaken a Sequential Test for its proposed site allocations (submission library reference ED113), and where appropriate has considered the Exception Test. However as a result of the receipt of the Inspector's Post Hearing Advice (EL6.003a), the council is proposing to amend two allocations where there is a flood risk issue. It is therefore necessary to consider whether or not the amended allocations pass the Sequential Test. This paper considers the Sequential Test for the two allocations in question and should be considered to represent an addendum to the original Sequential Test Paper (ED113).

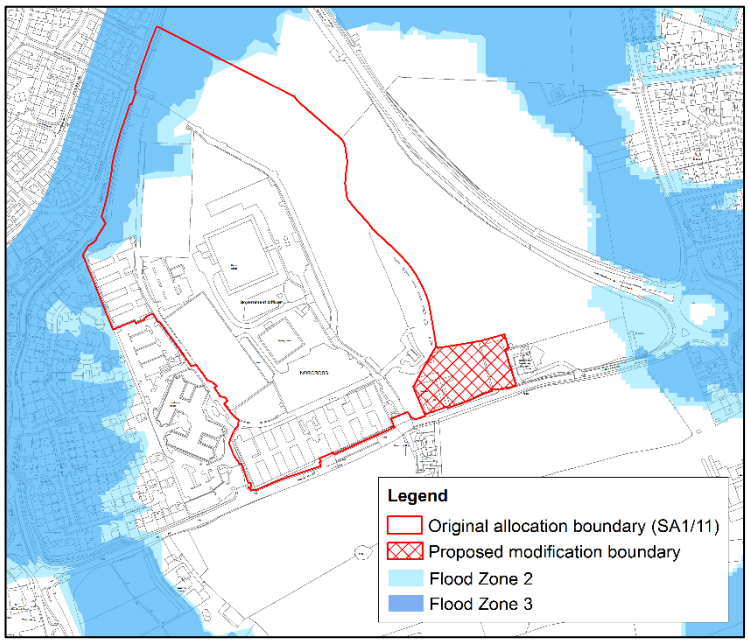
2.0 SA1/11 North of Norcross Lane, Norcross

2.1 In considering residential allocation SA1/11 North of Norcross Lane, Norcross, the Wyre Local Plan Inspector in his Post Hearings Advice – Main Modifications and Related Matters (EL6.003a, para. 18 and 28) - advised the council that exceptional circumstances exist that justify extending the allocation to encompass land currently within the Green Belt (with outline approval for mixed-use development).

2.2 The council has accepted this Advice and is proposing to allocate the land in question as part of SA1/11.

2.3 According to the methodology set out in the Sequential Test paper (ED113) sites with planning permission are not subject to the Sequential Test as flood risk matters will have been considered as part of the consideration on the planning application. At the time of allocation (September 2017) the majority

of SA1/11 had outline planning permission, including the land forming the proposed allocation extension.



2.4 The council has considered the flood risk implications of the Inspector's advice to modify the allocation by extending it along Norcross Lane (see plan above).

2.5 Flood risk and drainage matters associated with allocation SA1/11 as originally defined in the Publication Draft Wyre Local Plan 2017 were assessed in detail as part of the Strategic Flood Risk Assessment Level 2 (SFRA Addendum - ED112) (SFRA site reference SFRA_20).

2.6 The additional land measures some 0.7ha. It lies in Flood Zone 1. It was not included as part of the assessment of site SFRA_20. However, it is part of the wider outline planning permission that covers the majority of SA1/11 and as such flood risk matters have been considered as part of the development management process. Consultation with the council's drainage engineer has identified no additional or specific drainage or flood risk matters arising. As such the council considers that modest nature of the extension – some 0.7ha – has no material impact on the conclusions previously drawn in the SFRA Sequential Test paper (ED113). The allocation as proposed to be modified therefore passes the Sequential Test. Given the fact that the site has a planning permission there is no requirement to consider the Exception Test.

3.0 SA1/13 Inskip Extension

3.1 In his Post Hearings Advice (EL6.003a, para. 31) the Wyre Local Plan Inspector has advised the council to consider whether a modest additional

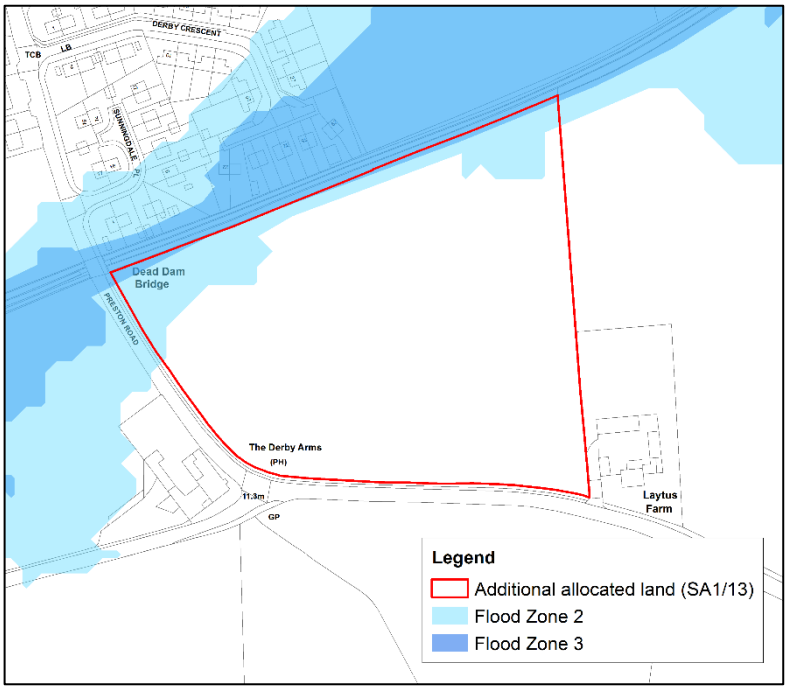
allocation of land at Inskip known as Dead Dam Bridge (2017 Strategic Housing Land Availability Assessment reference INS_07) would be justified.

3.2 The council has accepted this Advice and is proposing to allocate the land in question as part of a modified SA1/13 residential allocation.

3.3 Flood risk and drainage matters associated with allocation SA1/13 as originally defined in the Publication Draft Wyre Local Plan 2017 were assessed as part of the Strategic Flood Risk Assessment Level 2 (SFRA Addendum - ED112).

3.4 SA1/13 as originally allocated lies in Flood Zone 1. It was therefore not subject to the Sequential Test.

3.5 The site known as Dead Dam Bridge (INS_07) lies to the south east of the village of Inskip. It was assessed as part of the Strategic Flood Risk Assessment Level 2 (SFRA Addendum - ED112) (reference SFRA_36_06). A watercourse known as Inskip Brook forms the northern boundary of the site. The brook is a designated Main River and discharges into the River Wyre approximately 3.6km to the north west of the site.



3.6 A relatively small area of INS_07 (some 13%) lies within Flood Zone 2 and 3 (the vast majority being FZ2). Hence, the majority of the site – some 87% - lies in Flood Zone 1.

3.7 The Level 2 SFRA Addendum (ED112) indicates that the site lies in an area of high risk of fluvial and groundwater flooding, the former on the basis of the presence of the flood zones associated with Inskip Brook (see plan above).

3.8 As part of the site – albeit limited – falls within Flood Zones 2 and 3, the council is required to undertake a Sequential Test of the proposed allocation as per the methodology set out in the Level 2 SFRA: Flood Risk Sequential Test Paper (ED113).

3.9 It is noted that allocation policy SA1/13 Inskip Extension as proposed to be modified includes a Key Development Consideration (KDC) restricting built development to Flood Zone 1. Public open space could therefore be proposed in river corridor part of the site which is within Flood Zone 2/3 and 8 metres of Inskip Brook (see below).

3.10 A further KDC also states that an appropriate easement to Inskip Brook will be required – as such there should be no development with 8 metres of Inskip Brook. It is noted that under the Environmental Permitting (England and Wales) Regulations 2016, a developer may require a permit from the Environment Agency for any proposed works or structures, in, under, over or within 8 metres of Inskip Brook.

3.11 Policies within the Local Plan require applicants to provide mitigation measures to ensure that sites are safe for the lifetime of the development, and a Flood Risk Assessment (FRA) must be carried out as part of any planning application. The FRA must be used to take a sequential approach to site layout in line with the KDCs. Surface water should be addressed using the surface water management hierarchy set out in the emerging Local Plan.

3.12 The development of the site (INS_07) is considered to be sequentially preferable taking into account the recommendations of the Inspector and given the lack of suitable and available sites for housing in Inskip in areas of lesser flood risk.

3.13 In addition, due to the limited amount of land within the site affected by Flood Zones 2 and 3, the requirement for any housing to be within Flood Zone 1, the benefit of development supporting and enhancing the vitality of a rural community, the need to make provision to meet housing needs, and the presence of a Local Plan policy framework that supports the need for mitigation measures (if required) and Sustainable Drainage Systems, the subject site (INS_07) is deemed to have passed the first part of the Exception Test. Although the assessment of flood risk carried out as part of the SFRA (ED112) has identified flood risk matters it is considered that the Local Plan policy regime provides a sufficiently robust approach to ensure that the

development does not increase the risk of flooding within the site and elsewhere.