



Document Reference  
**PS.EVR25**

East Cambridgeshire  
District Council

## **Policy LP25 – Managing Water Resources and Flood Risk**

**November 2017**

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# 1. Introduction and Policy Context

## Introduction

- 1.1 East Cambridgeshire District Council is reviewing its Local Plan, which was last adopted in April 2015. The new Local Plan, which is hoped to be adopted in 2018, will provide a framework for development in the district until 2036 and beyond.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP25 (of the Proposed Submission Local Plan, November 2017), which relates to managing water resources and flood risk.

## National policy

- 1.3 The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance.
- 1.4 The need to take flood risk and water management into consideration is referenced throughout the NPPF with supporting guidance in the NPPG on flood risk and coastal change, water supply, wastewater and water quality and climate change.
- 1.5 Section 10 of the NPPF concerns "Meeting the challenge of climate change, flooding and coastal change" and there is a separate section on "Plan-making". The following points are particularly relevant:

- Paragraph 17, in listing the core land-use planning principles that should underpin plan making, states that planning should "*support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change...*"
- Paragraphs 93 to 108 form section 10 and include the following paragraphs that are of particular relevance.
- Paragraph 94 states that "*Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.*"
- Paragraph 99 requires Local Plans to "*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 risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.*"
- Paragraphs 100 to 104 go on to explain that Local Plans should be supported by Strategic Flood Risk Assessments and the details and application of the Sequential Test and Exception Test, if necessary.
- Paragraphs 150 to 157 concern "plan-making" and includes the following points which are particularly relevant:  
*"Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic priorities to deliver... the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management..."*

*“Crucially Local Plans should... plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework”...*

- Paragraphs 158 to 177 provide guidance on the proportionate evidence base on which Local Plans should be based. Within this section paragraph 160 states that local planning authorities *should “work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.”*

While paragraph 162 states that “local planning authorities should work with other authorities and providers to:

- *Assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and*
- *Take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”*

And paragraphs 165 and 166 state that “*Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans...*” and “*Local Plans may require a variety of other environmental assessments, including under the Habitats Regulations where there is a likely significant effect on a European wildlife site (which may not necessarily be within the same local authority area), Strategic Flood Risk Assessment and assessment of the physical constraints on land use.*”

- 1.6 The above NPPF policy and NPPG guidance has been taken into account in preparing the Local Plan as a whole, and policy LP25 in particular.

## 2 East Cambridgeshire Context in Relation to Policy LP25

- 2.1 Flood risk is an important issue for East Cambridgeshire, particularly given the topography of the area, whereby parts of the district are at or below sea level and, potentially, more vulnerable to the impact of climate change. The major rivers (the Great Ouse, the Cam and the New and Old Bedford Rivers) all pose a risk of flooding, and periodically in the past, areas near to these have been subject to flooding. Further climate change coupled with the requirement for additional housing and employment sites has the potential to increase the risks to people and property. Therefore it is essential that a robust policy framework is in place to ensure that flood risk is fully taken into account in the development process and risks minimised.
- 2.2 East Cambridgeshire, as with the rest of Cambridgeshire and West Suffolk, is classified as an area of serious water stress. When combined with hydrology and water quality in the region there is scope for development to have significant impacts upon the water environment in the area.
- 2.3 Water quality is particularly important in the district as many watercourses have international or national environmental designations. In order to maintain the quality of watercourses and their surroundings it is important that new development ensures that increases in run-off and sewage effluent discharge can be achieved without adverse impact on water quality. The Council places a high priority on protecting surface and groundwater from pollution arising from development.

### 3 Local Plan Policy: Preliminary Draft

- 3.1 The Preliminary Draft Local Plan (February 2016) contained a policy entitled Managing Water Resources and Flood Risk. A number of representations were made on the policy, and in summary the key issues raised for the policy were:
- Overall comments were broadly supportive of the policy.
  - A number of comments were made relating to site selection process or putting forward sites suitable for development.
  - Technical comments relating to new flood modelling that is now available and the consideration of residual flood risk, should flood defences fail.
  - A request for specific changes to wording to improve clarity.
- 3.2 In response to the comments received at the Preliminary Draft stage, together with further consideration of existing or new evidence, the policy was amended for the Further Draft in the following ways.
- 3.3 The second bullet of paragraph 6.5.4 was amended to read "*Not increase the risk of flooding to other areas and where possible reduce the overall flood risk;*"
- 3.4 A Strategic Flood Risk Assessment (SFRA) has been prepared for the district, using the most up to date information and modelling available. This has been used to inform the site selection process, and can be used for site specific flood risk assessments required to accompany specific development proposals.
- 3.5 Additional wording was included within point 'a' of the policy to address the comments relating to residual flood risk.
- 3.6 Following receipt of the SFRA, the policy has been updated to reflect the circumstances where a site specific flood risk assessment will be required. The policy therefore was amended to read "...*for development proposals:*
- *In Flood Zones 2 and 3; and*
  - *In Flood Zone 1 where there are critical drainage problems; and*
  - *On sites of 1 hectare or greater in Flood Zone 1; and*
  - *Sites where development or change of use to more vulnerable use may be subject to other sources of flooding; and*
  - *Sites of less than 1 hectare in Flood Zone 1 where they could be affected by sources of flooding other than from rivers and the sea."*
- 3.7 Where specific sites have been promoted, these have been considered alongside all other sites submitted.

### 4 Local Plan Policy: Further Draft

- 4.1 The Further Draft was published for consultation in January – February 2017.
- 4.2 Various, but very limited, comments were received during the Further Draft consultation, either supporting the policy or expressing concern over certain aspects of the policy. In summary, the key issues raised for the policy were:
- Various comments broadly supporting elements of the policy

- Various comments suggesting the policy needs amending, especially in relation to protecting existing ponds and lakes, the Offshore Marine Plan (2014), and factual errors relating to the Old and New Bedford Rivers.
- 4.3 In response to the comments received at the further Draft stage, together with further consideration of existing or new evidence, it has not been considered necessary to make any further amendments to the policy for the Proposed Submission version, with the exception of the correction of the factual errors and updating the supporting text.

## 5 Alternative Reasonable Options

- 5.1 The following alternative options have been considered for this policy. (Option 1 is the preferred policy approach which has been included in the Further Draft.)
- 5.2 **Option 2:** No policy, and rely on national policy for this subject area. This option was rejected, as although national policy provides a detailed framework for assessing and managing flood risk, Option 1 proves criteria development proposals must satisfy to demonstrate that the proposals do not increase flood risk or negatively impact upon the water environment.

## 6 Conclusion

- 6.1 This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Local Plan (November 2017). We hope this helps demonstrate how we have responded to comments received during the Preliminary and Further Draft consultation stages, as well as how the latest evidence and national guidance has been taken into account.