

## **Matter 3: Planning and flood risk and water management**

### **Whether the policies relating to flood risk and wider water management issues are justified, effective and consistent with the JCS and national policy?**

- 32. Has the GCP been supported by an up to date evidence base in relation to flood risk matters? Are Policies E5 and E6 consistent with the JCS and national policy in relation to the consideration of flood risk and its avoidance, together with appropriate mitigation measures? Is the wording of policy E6 sufficiently flexible and does the policy meet the challenge of flooding and a changing climate? Potential impacts of flood risk on individual site allocations should be addressed in Matter 10.**
- 32.1 Policies E5 Green Infrastructure ‘Building with Nature’ and E6 ‘Flooding, sustainable drainage and wastewater’ are comprehensive and fully supported by an up-to-date evidence base including a comprehensive Strategic Flood Risk Assessment Level 2 (JBA 2019) (Submission Document NAT004) and Site Allocations Sequential Test (GCC, 2019) (Submission Document NAT005). The policies accord with and support the delivery of Adopted JCS policies INF2 Flood Risk Management and INF3 Green Infrastructure and they are fully in accordance with the NPPF.
- 32.2 In terms of the need to reference blue as well as green infrastructure, the flexibility of policies and their ability to meet the challenges associated with climate change, see the proposed modifications in CD010a the Schedule of changes Pre-Submission Gloucester City Plan addendum Ref: PM041, PM046, PM047, PM048, PM049, PM050, PM051, PM052, PM053, PM054 and shown as a part of the GCP in CD010b Appendix 1 Tracked Changed Pre-Submission GCP.
- 32.3 Additionally, these matters have been addressed in the Statement of Common Ground (SoCG7) between Gloucester City Council, the Environment Agency, the Local Lead Flood Authority, and the Marine Management Organisation. Also addressed and agreed in the Statement of Common Ground is the matter of whether it is necessary for all site allocations to have some reference to the particular level of flood risk/flood zone.
- 33. With reference to the River Severn and the Gloucester and Sharpness Canal, what is the significance of the Marine Management Organisation in relation to GCP making and decision taking?**
- 33.1 By means of the tidal River Severn, Gloucester City lies within the South West Marine Plan Area. Therefore, any development likely to have an impact on this area should take the South West Marine Plan into account as well as the Marine Policy Statement. In plan-making and decision-taking the Marine Management Organisation (MMO) should be consulted as appropriate.
- 33.2 In responding to comments made by the MMO in their response to the Pre-Submission GCP, several proposed changes have been submitted that seek to strengthen this point, which are for consideration at the examination in public. These have been agreed through the Statement of Common Ground between Gloucester City Council, the Environment Agency, the Local Lead Flood Authority, and the Marine Management Organisation (SoCG7). They are further identified in CD010a the Schedule of Changes Pre-Submission Gloucester City Plan Addendum Ref: PM055, PM056 and PM057 and shown as a part of the GCP in CD010b Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan.

**34. Is the application of the Optional Technical Housing Standard for water efficiency justified and consistent with national policy in relation to need and viability? Should Policy G7 reference a more holistic approach to implementing measures to achieve required levels of water efficiency**

- 34.1 Yes, it is. The NPPF requires local authorities to ‘...take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures’ (paragraph 149, our emphasis). The Planning Practice Guidance further provides example of how development can adapt to climate change, including ‘Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality’ (Paragraph 003 Reference ID: 6-003-20140612).
- 34.2 The GCP Infrastructure Delivery Plan (Submission Document INF001) provides commentary with regard to water and wastewater at Section 8. Paragraph 8.1.4 states ‘...the EA has highlighted that climate change poses a threat to the long-term resilience of economic activities which rely on continued water supply. Making the right investment and planning decisions will be vital to keep pace with climate change’. Paragraph 8.1.6 provides an extract from Severn Trent’s Water Resource Management Plan, which states its strategy is to ‘continue with our long-term drive to reduce the amount of water we abstract, and we will increase the flexibility and capacity of our Strategic Grid to cope with future water uncertainties.’
- 34.3 More recently, Severn Trent has confirmed that the Severn Trent Strategic Grid Area, within which Gloucester City lies, has been identified as ‘highly vulnerable’ within their Water Resource Management Plan (2019). Whilst ensuring adequate water supply is the responsibility of Severn Trent, it is important to ensure that water use is reduced, and that water efficient fittings and appliances are installed in new homes. More widely, water efficiency provides wider benefits in terms of reducing the carbon footprint of water supply, the water cycle and the environment. The City Council has declared a climate change emergency and measures such as these support the authority’s response to climate change, and at minimal cost.
- 34.4 The cost implication of Policy G7 ‘Water efficiency’ have been considered in the Viability Appraisal (Submission Document VIA001). Paragraph 5.58 of this report identifies that such measures incur minor additional costs to development and that ‘...since the water costs is likely to cost less than £50 per unit, it is treated as de-minimis and therefore is not tested’.
- 34.5 In considering the GCP Pre-Submission consultation response from the Lead Local Flood Authority in relation to this matter, additional supporting text has been proposed, to be considered at the examination, which provides information on the sorts of measures developers can employ to improve water efficiency in new developments. This have been agreed through the Statement of Common Ground between Gloucester City Council, the Environment Agency, the Local Lead Flood Authority, and the Marine Management Organisation (SoCG7). They are further identified in CD010a ‘Schedule of Changes Pre-Submission Gloucester City Plan Addendum’ (reference PM074) and shown as a part of the GCP in CD010b ‘Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan’.