

Gloucester City Plan Examination

Matter 3 – Flood Risk and Water Management

Participant Statement by Savills on behalf of L&Q Estates

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.

We make comments in respect to Policy E5 under Matter 4. For clarity, we consider that as drafted Policy E5 is consistent with national flood risk policy – the Building with Nature standard provides a flexible approach to delivering drainage infrastructure as part of multi-functional green infrastructure where this is possible.

In terms of Policy E6, we have two comments:

- Paragraph 1 of the policy seeks a 'betterment' to be delivered through the planning process. It is not immediately obvious what this means, and whether the draft policy is seeking to go beyond national policy. In practice, the term betterment is frequently applied to development proposals which restrict runoff to greenfield rates in a plus climate change scenario and on brownfield sites a reduction against pre-development flows (as per paragraph 3.5.35 of the draft Plan) – with the combination resulting in a restriction of peak flows creating a betterment downstream during high rainfall situations. We assume that this is the intention of the policy, and this is supported, and should be clarified in the explanatory text.

If the policy is seeking additional betterment, then further guidance must be provided, and the potential cost implications of this considered within the viability appraisal.

- Proposed Modifications PM049, 053 and 054 – the implication of the proposed modifications is that there are potentially more instances where financial contributions will be sought from development in regard to flood mitigation/management.

We recognise that there will be instances where there are specific flood defence or mitigation projects which are directly related to any development proposal and accord with NPPF paragraph 56 and associated legislation; however as per paragraph 3.5.8 of the draft Plan, these would be 'rare'.

The amendments to the policy suggest an expanded scope for contributions. In particular, the reference to upstream flood management (assumedly offsite) is of concern; with the potential that this could capture a significant number of developments across the plan area. The Viability Report (VIA001), Table 3.2 assumes no costs associated with Policy E6.

The need for offsite/strategic flood mitigation works should be assessed in the SFRA, documented in the Infrastructure Delivery Plan, and costed in the viability appraisal.

In terms of an individual planning application, we would question how the impact of offsite natural flood management would be quantifiable, identified as directly related to the proposal, and how an appropriate contribution would be identified.

We consider that future strategic projects of this nature should be funded through CIL, and/or specifically identified through the JCS Review with direct correlation to future development to enable a basis for an appropriate s106 contribution.

The NPPF (paragraph 157) encourages natural flood management, and this should be encouraged through the draft Plan based upon potential on-site opportunities as part of the general approach to green infrastructure provision.

At this stage, there is insufficient evidence to correlate the draft Plan with any wider offsite Upstream Natural Flood Management, and there is a significant risk with the inclusion of the proposed modifications suggested by Gloucestershire County Council (GCC) that additional financial contributions will be sought from development which has not been accounted for in the draft Plan's viability evidence.

The proposed modifications to Policy E6 should be removed, and if considered necessary, strategic flood management should be considered through the JCS Review.

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?

No comment.

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?

In accordance with the PPG, it is necessary to demonstrate that the optional standard is needed within the respective location, and this must be set out fully within the evidence base; reflecting on existing sources of evidence, consultation of local water and sewerage companies, the Environment Agency and catchment partnerships¹.

As explained in the PPG, the building regulations set out a standard, and thus the tighter standards are only applicable *“where there is a clear local need”*². Thus by definition, need must be based upon local evidence as opposed to a more generic aspiration. We have not ascertained the justification for this policy standard within the draft Plan evidence base.

We note the proposed modifications of the policy (PM074) and do not consider these necessary. There is no prescribed method in the building regulations for how this enhanced standard is to be met, and meeting the standard is a technical assessment, with no direct correlation with water quality and SuDS.

Whilst we note that the Authority consider the cost of the optional standard as negligible, it is still a cost which must be considered as part of the cumulative costs associated with the policies within the draft Plan. This is of particular importance where there is a demonstrable concern in regard to viability over the plan area.

Savills

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¹ PPG: 56-015-20150327

² PPG: 56-014-20150327