

Newcastle Under Lyme Borough Council
Planning Services Department
Civic Offices
Merrial Street
Newcastle
Staffordshire
ST5 2AG

Our ref: UT/2006/000035/AP-
08/SB1-L01
Your ref:
Date: 23 May 2019

Dear Sir/Madam

**Chapel and Hill Chorlton, Maer and Aston, and Whitmore Neighbourhood
Development Plan (Regulation 16)**

Thank you for referring the above Neighbourhood Plan submission for comment which was received on 24 April 2019. We are broadly in support of the aims and objectives and wish to make the following comments in regards to fluvial flood risk.

In our previous response to the Draft Plan submission (letter ref. UT/2006/000035/AP-07/IS1-L01 dated 30 October 2018) we suggested recommendations to amend the proposed policies and statements at this time.

We welcome the inclusion of ‘...*watercourse and their floodplains...*’ in the first bullet point of ‘Policy NE1: Natural Environment’. However, we did recommend strengthening ‘Policy NE2: Sustainable Drainage’ to take into account the impacts of climate change and a requirement for all SuDS to be maintained so that they operate effectively, by including for example:

Long term maintenance arrangements for all SuDS should also be in place for the lifetime of the development and agreed with the relevant risk management authority.

We wish to reiterate that Map 16 is related to fluvial flood risk and not surface water flood risk, which has been used as the evidence base for ‘Policy NE2: Sustainable Drainage’. A Surface Water Flood Map has not been included for the Neighbourhood Plan Area in the document entitled ‘Volume II: Maps and Supporting Evidence’.

We welcome the addition in ‘Policy NE2: Sustainable Drainage’ to not increase flood risk to areas surrounding the Neighbourhood boundary. Please note, the following policy statements in either Policy NE1 and Policy NE2 could be expanded to include:

- A clear statement that, in line with national policy, all new development should be directed away from those areas at highest flood risk, i.e. towards Flood Zone 1.

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Cont/d..

- Proposals for new development should consider future flood risk and, where appropriate, include measures that mitigate and adapt to the anticipated impacts of climate change.
- Further detail in relation to the statement in relation to opportunities to open up culverted watercourses to include reducing the associated flood risk and danger of collapse whilst taking advantage of opportunities to enhance biodiversity and green infrastructure.
- Retention and creation of local green spaces and green infrastructure can provide a role with managing and mitigating flood risk as well as enhancing biodiversity and providing connectivity.

Further evidence for 'Policy COM2: Local Green Space' could include the significant role in managing flood risk and flood mitigation in the area, particularly in relation to surface water flooding.

Although the majority of the ordinary watercourses within this Neighbourhood Plan area are in Flood Zone 1 as no mapping has been undertaken due to its position high in the catchment, there may well be risk associated with this watercourse which is currently unassessed and is not shown on our Flood Map for Planning (Rivers and Sea).

In line with National Planning Policy we would wish to see all new development sequentially tested, directed away from those areas at highest flood risk, i.e. towards Flood Zone 1. We recommended 'Policy HG1: New Housing' could be strengthened to include the following development requirements:

- Be directed away from those areas at highest flood risk, i.e. towards Flood Zone 1.
- Demonstrate that it will not increase flood risk elsewhere, both in and out of the parish.
- Consider future flood risk and, where appropriate, include measures that mitigate and adapt to the anticipated impacts of climate change.

If you have any queries contact me on the details below.

Yours sincerely

