

From: Sayce, Stephen [mailto:stephen.sayce@environment-agency.gov.uk]
Sent: 03 December 2015 15:03
To: Andrea OConnor
Subject: RE: Sefton Local Plan - EA views on Mods to policy EQ8

Dear Andrea

We never made any specific comments regarding EQ8 'Managing Flood Risk and Surface Water' because we never had any specific concerns. However as requested I've taken time to look through the amended policy and provide some comments below;

2A. Ground floor and basement access levels of all more vulnerable development should be 600mm above the 1 in 100 annual probability fluvial flood level or the 1 in 200 annual probability tidal flood level with an allowance for climate change, taking into account the presence of defences and the residual risks of failure of those defences.

It should be noted that we generally recommend these levels be applied to other vulnerabilities within the 100 (fluvial) or 200 (tidal) year event not just 'more vulnerable'. Raising floor levels safely (i.e. considering the displacement of flood waters and flood flows) can be an effective method of protecting any type of development as it significantly prevents the ingress of flood waters to all developments. Not just those considered more vulnerable.

Paragraph 10.57

When considering compensatory flood storage we generally recommend an allowance for climate change.

Surface Water Management

Even though we recognise the importance of the surface water elements of the policy we do not make any specific observations as we the Lead Local Flood Authority, in this case Sefton Council, as the competent authority would be better placed to comment. We do however note the proposed reductions of discharge rates which we generally welcome as this can reduce the flood risk burden on main rivers during an event.

Should you wish to discuss this in more detail please do not hesitate to contact me.

Kind Regards

Steve Sayce

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We are now

Greater Manchester, Merseyside and Cheshire Area

From 1 April 2014 North West South Area has a new name. Covering the same geography, we will continue to work with our partners and customers to help protect and improve the environment.



We have
moved to...



From: Andrea OConnor [<mailto:Andrea.OConnor@sefton.gov.uk>]

Sent: 26 November 2015 10:55

To: Sayce, Stephen

Subject: Sefton Local Plan - EA views on Mods to policy EQ8

Importance: High

Dear Stephen,

At the Local Plan EIP hearings session on Tuesday 24 November, Policy EQ8 'Managing Flood Risk and Surface Water' and the Council's proposed Modifications to it were discussed.

The Inspector was aware that the Environment Agency had not made formal representations on the policy; however he requested that the Council seek the Environment Agency's views on the modifications to the policy. Accordingly, I attach a copy of the version of the policy which was discussed. **I would request that you send the Environment Agency's formal views to the Council by 10 December at the latest, if at all possible, by email, letter or e-letter.** (The Inspector set out an overall deadline of 18 December for all further information to be on-line).

Please note that the attached version of the policy **includes** two typo errors which the Inspector asked us also to correct in part 4 – 'Practicable' instead of 'practical' in part 4, and adding a missing '**of**' in part 4b. The Inspector agreed that we should make these changes as further Modifications in any case).

If you have major reservations, please let me know asap so that we can discuss any ways forward.

I should perhaps clarify for your information that many of the proposed Modifications align the wording more closely with the NPPF and online PPG (e.g. to sections 1 and 2, 5 and the sentiment behind 5a). The new sections 2A and 2B are in line with the recommendations of the SFRA. I gather that the finished floor level relating to surface water (Part 2B) is usually required by the Council, hence to give developers certainty it seemed best to put parts 2A and 2B into the policy. If a detailed discussion on the rationale for any of the changes would be helpful, please give me a ring). More information about other Modifications and their rationale is available in the Examination Library, see <http://www.sefton.gov.uk/planning-building-control/planning-policy/local-plan-examination-library.aspx>.

I look forward to receiving your response. Thank you very much.

Andrea

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Mondays: 9am to 5pm, Tuesdays to Fridays: 9am to 3pm

The Sefton Local Plan examination hearings began on 17 November. The hearings will continue until 10 December 2015 and resume from 12 to 14 January 2016 . See www.sefton.gov.uk/localplan for more information.

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