

Wiltshire Council

Cabinet

3 July 2018

Norman Swanney - Trowbridge

To Councillor Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Property

Question (3)

- a) With particular reference to Site 3565 of the Housing Allocation Plan, is the whole Cabinet *now* fully aware of the Environment Agency Flood Plain analysis entitled "South Court Farm" [*sic*] and with Paragraph: 015 Reference ID: 7-015-20140306 of the NPPF/Environment Agency Directive in relation to the non-disturbance of flood plains?
- b) Southwick Court, site 3565, is a notified flood plain and the NPPF Sequential Test forbids by statute, building on functional flood plain unless there is no other land. Is it therefore Wiltshire Council's position that there is no other dry (non-floodplain) land left in Trowbridge which can be nominated for development in the Housing Allocation Plan, instead of Site 3565?

Response

- a) The Wiltshire Housing Sites Allocations Plan (WHSAP) and its supporting evidence has been published in advance of Cabinet to allow councillors, interested parties and members of the public to review the documentation before the meeting on 3rd July. The supporting evidence presented includes the Trowbridge Community Area Topic Paper¹ and the Sustainability Appraisal (Annex 1 – A.8)², which set out the full assessment of potential site allocations at Trowbridge. In addition the map (see attachment A1) has been circulated to all cabinet Members.

In relation to the proposed allocation at Southwick Court (Policy H2.6), flood risk has been assessed through the site selection process and this has included a review of the Environment Agency Flood Maps and the Council's Strategic Flood Risk Assessment³ which show that part of the site is within Flood Zone 2 / 3. Assessment of the site has also included consultation with the Environment Agency who have confirmed that there would be no objection to the development of the site, provided that development is directed outside of the identified areas of Flood Zone 2 and 3.

¹ <https://cms.wiltshire.gov.uk/documents/s143992/Trowbridge%20CATP%20May%202018%20FINAL%2016-05-18.pdf>

²

<https://cms.wiltshire.gov.uk/documents/s143288/Sustainability%20Appraisal%20Report%20Annex%20I%20MAY%202018.pdf>

³

http://www.wiltshire.gov.uk/planningpolicyevidencebase/evidencebasewest.htm#West_Wiltshire_planning_policy_evidence_base_SFRA-Anchor-2

In respect of surface water drainage Wiltshire Council are the Lead Local Flood Authority, and the Council's drainage officers have also been consulted as part of the site assessment process. As set out in the Sustainability Appraisal (Annex 1 – A.8) assessment for the site, the susceptibility of parts of the site to surface water flooding is acknowledged but this is not considered to stifle the development capacity of the entirety of the site, as mitigation measures can be put in place to address surface water flood risks. It is expected that where appropriate, the development of the site may need to make provision for on-site surface and foul water drainage solutions and network improvements are likely to be required to prevent storm/sewer flooding. In addition it is anticipated that any future development of the site would incorporate Sustainable Drainage Systems (SuDS) to control the risk of surface water flooding from impermeable surfaces. A drainage strategy at the planning application stage would be expected to fully address all surface water management issues

Paragraphs 5.79 through to 5.82 of the Plan, set out a range of matters that will need to be addressed to deliver a comprehensive, high quality development scheme. This includes ensuring built form development is directed away from critical flood zones associated with the Lambrok Stream.

In respect of this matter, the draft Plan has been prepared in conformity with the policies of the Wiltshire Core Strategy and National Planning Policy Framework and responds accordingly to the advice provided by the Environment Agency and drainage engineers within the Council.

- b) As set out above, the Council recognise that there are parts of the site which fall within Flood Zones 2 and 3. With this in mind, the potential developable capacity of the site has been adjusted to reflect that only the land outside of Flood Zones 2 and 3 will be developed. This is reflected in the supporting text to the policy, which requires that built form development is to be directed away from critical flood zones associated with the Lambrok Stream.

This approach is consistent with the Sequential Test required by the National Planning Policy Framework, which aims to steer new development to areas with the lowest probability of flooding (Flood Zone 1).