

Question 26: Flood and Water Management

50103

Consultee

Title

First Name Melanie

Surname Atwell

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50103-60 **26a) Do you have any views on how new development could reduce flood risk?**

Not really

50039

Consultee

Title

First Name Hilary

Surname Bailey

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50039-47 **26a) Do you have any views on how new development could reduce flood risk?**

Minimising loss of green space and hard standing. Planting/retaining trees.

50007

Consultee

Title

First Name Serena

Surname Bailey

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50007-65 **26a) Do you have any views on how new development could reduce flood risk?**

I am not informed enough on this issue to offer valuable feedback.

50046

Consultee

Title

First Name Bryan

Surname Baker

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50046-66 **26a) Do you have any views on how new development could reduce flood risk?**

Don't build on flood plain i.e. Sutton Road, Leverington - old Delamore site it's asking for trouble.

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50081

Consultee

Title Mr
First Name Martin
Surname Baker
Position

Agent

Title
Name
Surname
Position
Organisation

Organisation Wildlife Trust for Bedfordshire, Cambr

50081-22 **26a) Do you have any views on how new development could reduce flood risk?**

New developments need to fully integrate and adopt full SUDs systems with source control measures and grey water systems to reduce consumption of potable water, as soon as possible. Some areas of new habitat created through biodiversity net gain might also function as part of natural flood management systems helping to reduce flooding elsewhere or manage run off from new and existing developments.

50122

Consultee

Title
First Name Robert
Surname Boddington
Position
Organisation

Agent

Title
Name
Surname
Position
Organisation

50122-67 **26a) Do you have any views on how new development could reduce flood risk?**

New development will always increase flood risk.

50106

Consultee

Title Councillor
First Name Gavin
Surname Booth
Position
Organisation Parson Drove Parish Council

Agent

Title
Name
Surname
Position
Organisation

50106-53 **26a) Do you have any views on how new development could reduce flood risk?**

More emphasis should be given to the views of IDB's as they are the local experts.

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50029

Consultee

Title

First Name Ted

Surname Brand

Position

Organisation Brand Associates Architects

Agent

Title

Name

Surname

Position

Organisation

50029-42 **26a) Do you have any views on how new development could reduce flood risk?**

Suds are remedial measures and design, eg building higher etc, so that sites in flood zone 3, which are not actually at any significant risk of flooding, can be developed – see 27

50090

Consultee

Title

First Name Fiona

Surname Bryan

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50090-67 **26a) Do you have any views on how new development could reduce flood risk?**

No idea.

50083

Consultee

Title

First Name Andrew

Surname Burrell

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50083-58 **26a) Do you have any views on how new development could reduce flood risk?**

new development will only increase the risk of flooding by covering the ground that is needed to absorb the rain we currently get. Very few farmers now maintain ditches for run off only ones maintained by the drainage boards are cleared. More building and infrastructure will only make this worse.

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50070

Consultee

Title

First Name C

Surname Burrell

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50070-38 **26a) Do you have any views on how new development could reduce flood risk?**

Minimise development on a single site. Maximise the use of porous surfaces. Provide natural barriers to flood water. Provide water storage/run off areas within developments. Provide plenty of green space around the development. Minimise the loss of vegetation/trees.

50022

Consultee

Title Mr

First Name Adrian

Surname Cannard

Position

Organisation Cambridgeshire & Peterborough Com

Agent

Title

Name

Surname

Position

Organisation

50022-30 **26a) Do you have any views on how new development could reduce flood risk?**

By taking an integrated approach to new infrastructure, new development, greenspace and water management there could be 'win-win' opportunities to reduce flood risk at the same time as improving infrastructure.

50027

Consultee

Title

First Name

Surname Cannon Kirk

Position

Organisation

Agent

Title

Name Andrew

Surname Hodgson

Position

Organisation Pegasus Group

50027-66 **26a) Do you have any views on how new development could reduce flood risk?**

No comment

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50066

Consultee

Agent

Title

Title

First Name James

Name

Surname Carney

Surname

Position

Position

Organisation

Organisation

50066-62 **26a) Do you have any views on how new development could reduce flood risk?**

Work closely with the Internal Drainage Boards to ascertain and mitigate any flood risks - local knowledge is best!

50124

Consultee

Agent

Title

Title

First Name Charlotte

Name

Surname Dew

Surname

Position

Position

Organisation Larkfleet Homes

Organisation

50124-52 **26a) Do you have any views on how new development could reduce flood risk?**

Permeable paving and sustainable urban drainage solutions have the possibility of reducing the risk of surface water flooding. In some instances, other engineering solutions are required as surface water cannot naturally infiltrate into the ground.

New development can provide some solutions to surface water flooding however, unprecedented amounts of intense rainfall that results in flash flooding is unpredictable and unavoidable. New development cannot stop these instances however, it can mitigate its impacts to avoid any implications on the existing residential development.

50121

Consultee

Agent

Title

Title

First Name Anne

Name

Surname Dew

Surname

Position Development Planning Manager - East

Position

Organisation Persimmon Homes

Organisation

50121-50 **26a) Do you have any views on how new development could reduce flood risk?**

Continued use of SUD's

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50009

Consultee

Title

First Name Lesley

Surname Dorling

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50009-54 **26a) Do you have any views on how new development could reduce flood risk?**

Yes - no development to be given a green light on flood plains.

50010

Consultee

Title

First Name Eamonn

Surname Dorling

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50010-67 **26a) Do you have any views on how new development could reduce flood risk?**

Runoff water may make flood risk worse but the biggest threat will come from rising sea levels rather than from the western river flow.

50018

Consultee

Title Councillor

First Name James

Surname Downes

Position

Organisation Leverington Parish Council

Agent

Title

Name

Surname

Position

Organisation

50018-67 **26a) Do you have any views on how new development could reduce flood risk?**

Must adhere to drainage board and Environment Agency recommendations and regulations.

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50127

Consultee

Title

First Name Valerie

Surname Emmons

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50127-50 **26a) Do you have any views on how new development could reduce flood risk?**

In Chatteris it would mean extra sewage and drainage infrastructure as the current Victorian system is working at capacity already. More trees and hedgerows are needed to aid in flood protection.

50100

Consultee

Title

First Name Susanah

Surname Farmer

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50100-66 **26a) Do you have any views on how new development could reduce flood risk?**

Not personally, no

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50052

Consultee

Title Mr
First Name Stephen
Surname Faulkner
Position
Organisation Norfolk County Council

Agent

Title
Name
Surname
Position
Organisation

50052-1

26a) Do you have any views on how new development could reduce flood risk?

The area falls under a cross catchment zone between Cambridgeshire County Council and Norfolk County Council, both respective LLFAs for their regions. The area of focus for the Norfolk County Council LLFA is the market town of Wisbech. It is acknowledged that all six options put forward highlight the Wisbech area as a potential growth location in the region. It is further acknowledged that the distribution of growth varies considerably per option but the scale of growth (projected 11,550 homes) remains the same. Therefore, the following comments/advice have been drawn from the information provided:

- The document provides minimal reference to flood management and surface water flooding. It is expected that the final local plan would provide an appropriate flood risk assessment for surface water flooding including recognition of flood risk from ordinary watercourses within the area, a requirement for planning application. This should be carried out at a strategic level prior to individual applications by individual phases.

- Development must not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources. In turn, development must have a neutral or positive impact on surface water drainage, whereby greenfield runoff rates must be set as a minimum standard for drainage strategies.

- Development must include a source control sustainable drainage systems (SUDs) hierarchy with appropriate discharge locations.

- Developed areas must provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.

2

- Development must consider the impact of highway expansion in connection with the proposed residential development. Road networks must be included into any future drainage strategy and demonstrate clear storage and capacity to cope with surface water runoff.

- With reference to the overall development plan, we would request comment on how, in the future, any subsequent application for different phases of development considers how sustainable drainage relates to the surface water drainage strategy for the whole site. In particular, highlighting where different 'phases' rely on each other for the disposal of surface water, how this will be implemented during construction and operation of the development.

- As an LLFA we would require any drainage scheme and storage features for a proposed development to add in an allowance for future urbanisation. This 'Urban Creep' allowance is dependent on the residential development density and is replicated in Table 4 of Norfolk LLFA Guidance which is available at: <https://www.norfolk.gov.uk//media/norfolk/downloads/rubbish-recycling-planning/flood-and-watermanagement/guidance-on-norfolk-county-councils-lead-local-floodauthority-role-as-statutory-consultee-to-planning.pdf>.

- Where the area of Wisbech is concerned, plans must demonstrate engagement with relevant agencies,

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notably Cambridgeshire LLFA and Norfolk LLFA, with inclusion of appropriate IDBs in the planning process.

The points made have been cross-referenced with the Cambridgeshire LLFA to continue cooperation surrounding development in Wisbech.

2.2 Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

50031

Consultee

		Agent
Title	Mr	Title
First Name	Colum	Name
Surname	Fitzsimons	Surname
Position		Position
Organisation	Cambridgeshire County Council	Organisation

50031-18

26a) Do you have any views on how new development could reduce flood risk?

There should be further weight attached to SuDS in the Local Plan, as with other planning authorities in Cambridgeshire. This should include development management policies and standards covering: 1. Permeable paving requirements (e.g. all hardstanding areas constructed in permeable paving to provide initial slowing of surface water) 2. Policies to encourage new development to reduce potable water consumption and re-use of grey water. 3. Green roofs - e.g. all flat roofs constructed as green roofs - this will act in adapting to increased flood risk and winter rainfall whilst also adding to the aesthetic value of the district and making Fenland an attractive place to live (this will also improve mental health and wellbeing). Requirements such as permeable paving will not only address flood risk management, but provides treatment to surface water before entering into watercourses or the ground, which can improve water quality, habitats and biodiversity. In addition, provision of SuDS such as green roofs not only provides flood risk management but can improve the aesthetic value of developments and promote biodiversity. There should be a Local Plan Policy that requires all new developments to provide above ground SuDS. We need to see a movement away from storing surface water in below ground tanks as these are not considered to be sustainable. Provision of above ground SuDS will provide multi-functional benefits such as improving mental health and wellbeing and promoting biodiversity. In accordance with the NPPF and supporting technical guidance, development must not place itself or others at increased risk of flooding. All development should be required to demonstrate that regard has been given to existing and future flood patterns from all flooding sources and that the need for effective protection and flood risk management measures, where appropriate, have been considered as early on in the development process as possible. Developments should be safe and resilient to flooding and single storey residential developments should not be permitted in areas of high risk of flooding. Natural Flood Management should be incorporated to complement existing defences as this, like SuDS, can also provide wider benefit to an area.

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50114

Consultee

Title		Agent	
Title		Title	
First Name		Name	Matt
Surname	Foster Property Developments Ltd	Surname	Hare
Position		Position	
Organisation		Organisation	Carter Jonas LLP

50114-26 **26a) Do you have any views on how new development could reduce flood risk?**

Much of the land on the edge of main market towns within Fenland are significantly affected by flood zones. In order to deliver sufficient housing to meet the needs of the District in sustainable locations close to existing services in and facilities it may be the at the Council will need to look to allocate land within flood zones for residential development. It is noted that the Council intends to carry out a Strategic Flood Risk Assessment, it is anticipated that detailed modelling of flood risk within the District would see some areas of land on the edge of the main towns removed from flood zone status.

Applications for new development would be required to assess flood risk and include a drainage strategy to manage surface water. It is considered that the introduction of drainage infrastructure and flood mitigation measures would reduce specific flood risk at potential development sites.

50101

Consultee

Title		Agent	
Title		Title	
First Name	Roger	Name	
Surname	George	Surname	
Position		Position	
Organisation		Organisation	

50101-67 **26a) Do you have any views on how new development could reduce flood risk?**

Yes, reduce the amount of new development!

50061

Consultee

Title		Agent	
Title		Title	
First Name	Dave	Name	
Surname	Gibbs	Surname	
Position		Position	
Organisation		Organisation	

50061-34 **26a) Do you have any views on how new development could reduce flood risk?**

The flood risk is a red herring in areas that have not flooded for almost 800 years. We have some of the best flood defences in the world; they protect towns such as Wisbech as well as the land that feeds the nation. They will always be maintained, so to base planning policy on a theoretical flood assuming no defences exist is meaningless.

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50032

Consultee

Title Mr

First Name Iain

Surname Green

Position Senior Public Health Officer

Organisation Cambridgeshire County Council (Publi

Agent

Title

Name

Surname

Position

Organisation

50032-67 **26a) Do you have any views on how new development could reduce flood risk?**

Public health have no views on how new development could reduce flood risk.

50077

Consultee

Title

First Name M J

Surname Hawkins

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50077-25 **26a) Do you have any views on how new development could reduce flood risk?**

Don't build on areas that are potentially liable to flooding! For example, no building on land around Whittlesey that is fewer than 5 metres above sea level (which, I believe, is the Environment Agency's figure). Similar figures might apply elsewhere in the District.

50033

Consultee

Title Mr

First Name Mark

Surname Hemment

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50033-37 **26a) Do you have any views on how new development could reduce flood risk?**

Avoid hard standing. Do not build on land which acts as a natural balance pool (sponge) – holding water which is slowly released into the waterways and so avoid flooding. Wenny Road Meadow, and surrounding fields, acts as a sponge for East Chatteris.

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50012

Consultee

Title Mrs
First Name M Sadie
Surname Heritage
Position
Organisation

Agent

Title
Name
Surname
Position
Organisation

50012-46 **26a) Do you have any views on how new development could reduce flood risk?**

More concrete areas means more run off. Places being developed should, by law, include areas where the water can soak away

50128

Consultee

Title
First Name Stephen
Surname Hodson
Position
Organisation Hodsons

Agent

Title
Name
Surname
Position
Organisation

50128-59 **26a) Do you have any views on how new development could reduce flood risk?**

The Environment Agency gives guidance on which land can be built on. On-site mini lakes could be provided as the Persimmon site in East Delph, Whittlesey.

50003

Consultee

Title Ms
First Name Ruth
Surname Hufton
Position
Organisation Doddington Parish Council

Agent

Title
Name
Surname
Position
Organisation

50003-64 **26a) Do you have any views on how new development could reduce flood risk?**

There should be fewer developments where houses are rammed into tight spaces and where developments build too many houses too close together as this does not allow the rain to get away, and overwhelms the already inadequate drainage system

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50056

Consultee

Title Ms

First Name Shanna

Surname Jackson

Position Chartered Town Planner

Organisation Swann Edwards Architecture Limited

Agent

Title

Name

Surname

Position

Organisation

50056-59 **26a) Do you have any views on how new development could reduce flood risk?**

In planning applications consideration should be given to existing defences which protect sites and often result in the land being much less at risk than identified in the Flood Zones set by the Environment Agency.

50098

Consultee

Title

First Name Raymond

Surname Jones

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50098-9 **26a) Do you have any views on how new development could reduce flood risk?**

Use rain water for domestic use

50069

Consultee

Title Mr

First Name Simon

Surname King

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50069-53 **26a) Do you have any views on how new development could reduce flood risk?**

Create new open spaces that can double as flood lagoons and build Dutch-style houses in areas of high risk that can move up and down

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50125

Consultee

Title
First Name
Surname Kings Dyke Business Park Ltd
Position
Organisation

Agent

Title Mr
Name Ed
Surname Durrant
Position
Organisation Pegasus Group

50125-35 **26a) Do you have any views on how new development could reduce flood risk?**

Areas at risk of flooding should not automatically be dismissed as development sites as different areas within a site could accommodate 'sacrificial uses' and still allow for the efficient use of sites in sustainable locations.

50079

Consultee

Title Mr
First Name Peter
Surname Lankfer
Position
Organisation

Agent

Title Mr
Name Tom
Surname Nellist
Position
Organisation Trundley Design

50079-66 **26a) Do you have any views on how new development could reduce flood risk?**

No

50089

Consultee

Title
First Name Karen
Surname Luck
Position
Organisation Romain

Agent

Title
Name
Surname
Position
Organisation

50089-51 **26a) Do you have any views on how new development could reduce flood risk?**

Locate carefully. Build good drainage systems.

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50035

Consultee

Title Mr

First Name Tim

Surname Marks

Position

Organisation MVV Environment Ltd

Agent

Title

Name

Surname

Position

Organisation

50035-23 **26a) Do you have any views on how new development could reduce flood risk?**

It is important for developers to mitigate flood risk, however any policy should not be prescriptive and allow developers to propose suitable measures that take account of site constraints and operational requirements

50038

Consultee

Title Mr

First Name Ian

Surname Mason

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50038-41 **26a) Do you have any views on how new development could reduce flood risk?**

Plan positively to plant trees and hedges, shrubs and plants and restrict development which replaces green space with hard standing.

50042

Consultee

Title

First Name Jane Ann

Surname Mason

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50042-45 **26a) Do you have any views on how new development could reduce flood risk?**

Plant more trees and ensure that there are plenty of areas laid to grass as grass effectively absorbs rain water. This will result in fewer areas of hard standing.

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50073

Consultee

Title Mr
First Name John
Surname Maxey
Position
Organisation Maxey Grounds

Agent

Title
Name
Surname
Position
Organisation

50073-67 **26a) Do you have any views on how new development could reduce flood risk?**

Realistically assess risk. Current methods ignore defences hen we have some of the best in the world. Assessments should be based on the realistic prospect of flood water reaching the property ie the hazard maps not the flood zones, following a full level 2 study of the area. Proper assessment will remove many areas from higher risk levels. Given in the Fens we do not get water flows significantly as there are no hills, suitable finished floor levels can overcome residual risk

50129

Consultee

Title Mrs
First Name J
Surname Melton
Position
Organisation Chatteris Town Council

Agent

Title
Name
Surname
Position
Organisation

50129-63 **26a) Do you have any views on how new development could reduce flood risk?**

No

50126

Consultee

Title
First Name Alan
Surname Melton
Position
Organisation Manea Parish Council

Agent

Title
Name
Surname
Position
Organisation

50126-67 **26a) Do you have any views on how new development could reduce flood risk?**

No: guidance asks developers to demonstrate how to mitigate risk.

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50028

Consultee

Title Mr
First Name Graham
Surname Moore
Position Planning Officer
Organisation Middle Level Commissioners

Agent

Title
Name
Surname
Position
Organisation

50028-10

26a) Do you have any views on how new development could reduce flood risk?

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Comment- Our comments include but are not limited to the following:

- Whilst the extent of the Environment Agency's (EA) Indicative Floodplain is not an issue for us it is an issue for developers who consider that it is restricting growth within the District.

Given the special circumstances within The Fens, your Council may wish to consider its position concerning this matter.

- Because your Council's area relies on managed artificial drainage infrastructure, flooding can occur if the capacity of such infrastructure is exceeded, whether through the discharge of surface water, or by treated waste water flows. Therefore, all relevant development proposals must be discussed with the relevant RMA including the appropriate Internal Drainage Board at the earliest opportunity, preferably at the pre-application stage.
 - In addition to the requirements of the NPPF and associated technical guide, all applications for relevant developments must include a drainage strategy to demonstrate that:
 - (a) Suitable consideration has been given to the disposal of both surface and treated waste water flows and should detail any mitigation required;
 - (b) Appropriate arrangements have been made for developments adjacent to watercourses; and
 - (c) Issues of long-term ownership, funding and maintenance of the water level and flood risk management system are addressed.
 - All proposals should have regard to the guidance and byelaws of the relevant RMA including the Internal Drainage Boards. Where appropriate the contents of hydraulic models and studies, such as the Middle Level Strategic Study must be considered.
- See also the additional relevant items discussed elsewhere in this response.

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50021

Consultee		Agent	
Title		Title	
First Name	Elizabeth	Name	
Surname	Mugova	Surname	
Position	Sustainable Places Planning Advisor	Position	
Organisation	Environment Agency	Organisation	

50021-11 **26a) Do you have any views on how new development could reduce flood risk?**

Flood risk betterment should be sought through any large scale development in Fenland. For example, any large scale developments in areas at risk of flooding could include financial contributions towards the improvement of existing flood defences, which could also benefit other communities at risk of flooding. Any new large scale development could also reduce flood risk by incorporating SuDS that reduce existing surface water runoff rates.

Any redevelopment of brownfield sites within areas at risk of flooding could reduce flood risk by raising finished floor levels above existing floor levels, by incorporating flood resilient or resistant measures into new development and by removing ground floor sleeping accommodation.

50015

Consultee		Agent	
Title	Mr	Title	
First Name	Geoff	Name	
Surname	Newham	Surname	
Position		Position	
Organisation		Organisation	

50015-53 **26a) Do you have any views on how new development could reduce flood risk?**

We have a system of channels, dykes and drains all around us, but there are still mini lakes in the fields after rain.

Currently, houses are required to be built above the known level of risk.

Given the rise in levels predicted, it would make sense to increase that level. Pile driven foundations supporting a higher floor level.

All this increases costs, which becomes a disincentive for developers which, in turn, becomes counter-productive.

But, hey, that's what architects are for.

Best of all – don't build on flood plains. Don't build where surface water sits after rain. Maybe there should be a minimum height above sea level below which it's unlawful to build.

Especially in the Fens!

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50063

Consultee

Title

First Name Jessica

Surname Nobbs

Position

Organisation Water Management Alliance

Agent

Title

Name

Surname

Position

Organisation

50063-1

26a) Do you have any views on how new development could reduce flood risk?

Thank you for consulting King's Lynn Internal Drainage Board (IDB) as part of the Fenland Local Plan 2019-2040 Issues and Options Consultation. We are aware that the new Local Plan will be informed by a Strategic Flood Risk Assessment, which will enable the formulation of policies and selection of sites, however please find some hopefully relevant information below. The King's Lynn Internal Drainage Board (IDB) operate partially within the Fenland District Boundary and is a member Board of the Water Management Alliance (WMA). The North Level District IDB also operates within the Fenland District Boundary however this Board is not a member of the Water Management Alliance. A copy of the King's Lynn IDB Byelaws can be accessed on our website (https://www.wlma.org.uk/uploads/KLIDB_Byelaws.pdf). Maps of the King's Lynn Internal Drainage District are available here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse). It may be useful to highlight that IDBs are local public authorities that manage flood risk and land drainage within areas of special drainage need in England. Each IDB has permissive powers to undertake water management activities within their IDD. The purpose of delivering this work is to reduce flood risk to people and property and to manage water in a way that meets the local needs of business and agriculture, including during times of drought, whilst also dealing with its obligations and commitments to the environment. IDBs exercise a general power of supervision over all matters relating to water level management within their district. This is undertaken through the use of permissive powers that enable IDBs to regulate works on, or affecting, the watercourses within their area. Advice is also provided by IDBs through the planning system to ensure that planning applications for new development within their districts are supported by appropriate drainage strategies. IDBs conduct their work in accordance with a number of general environmental duties and promote the ecological wellbeing of their districts. They have a specific duty to further the conservation and enhancement of all designated environmental sites within their districts such as Site of Special Scientific Interest (SSSI). The WMA have now produced a Planning and Byelaw Strategy to communicate the way in which the WMA member Boards undertake their flood risk and water management functions to consolidate and highlight the existing IDB policy framework that supports the delivery of its work. This document is intended to support the strategies and plans of other RMAs that relate to flood risk, erosion and environmental matters. It does not seek to repeat the work of these other documents. The document is available online here. It may also be useful to highlight the principle of the IDB role in the planning process. In doing so the following may prove useful: According to the National Planning Policy Framework (February 2019), strategic policies set by Local Planning Authorities in their Local Plans should take into account advice from the Environment Agency and other relevant flood risk management authorities, such as Lead Local Flood Authorities (LLFAs) and Internal Drainage Boards (IDBs). In determining planning applications in accordance with national policy, local policies and relevant guidance, LPAs take into account advice from a number of different sources. These sources include from statutory consultees (such as the LLFA and the Environment Agency (EA)) as well as from other Risk Management Authorities (RMAs) on a non-statutory basis such as IDBs, Anglian Water or the Canals and Rivers Trust. Between December 2014 and March 2015 Government reviewed and consulted the arrangements for providing advice to planning

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authorities on drainage and flood risk. As part of their response to this consultation Government stated they recognised the important role IDBs fulfil in flood risk management and agreed that “there may be local instances where they should be consulted on new development proposals on a non-statutory basis.” Government considered at that time that the provision of advice from these bodies would best be established through local arrangements. The purpose of this section of our strategy is to set out where we believe consultation with our member Boards is of value to both LPAs and developers.

50023

Consultee

Title Ms

First Name Janet

Surname Nuttall

Position Sustainable Land Use Advisor

Organisation Natural England

Agent

Title

Name

Surname

Position

Organisation

50023-15

26a) Do you have any views on how new development could reduce flood risk?

We agree that management of water is important to reduce flood risk and to protect and improve water quality, habitats and biodiversity. Natural England supports the Council’s proposal to prepare a Strategic Flood Risk Assessment to inform Local Plan site selection and policies. We welcome reference to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD) and advise that the Local Plan should cross-reference this guidance.

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 170 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 155-165 of the NPPF.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available here) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

A specific requirement for relevant development to be accompanied by a detailed hydrogeological assessment would be welcomed.

Question 26: Flood and Water Management

50037

Consultee		Agent	
Title		Title	
First Name	Stewart	Name	
Surname	Patience	Surname	
Position	Spatial Planning Manager	Position	
Organisation	Anglian Water Services Ltd	Organisation	

50037-10 **26a) Do you have any views on how new development could reduce flood risk?**

In relation to flood risk reference is made to the risk of fluvial flooding and the predicted impacts of climate change. The expectation is that both local plans and planning applications should incorporate Sustainable Drainage Systems (SuDS) as set out in National Planning Policy Framework.

☒

The Local Plan Review should clearly state that Sustainable Drainage Systems are the preferred method of surface water disposal for both developments and re-developments. Similarly surface water connections to the public sewerage network should only be provided in exceptional circumstances with applicants providing evidence of having followed the surface water hierarchy (utilising methods as high as possible within hierarchy which should include water re-use before infiltration).

In relation to foul drainage we would recommend that the Local Plan Review included a requirement for applicants to demonstrate that there is capacity available within both the foul sewerage network and receiving Water Recycling Centre to serve the development or it can be made available in time to serve the development.

We would welcome the opportunity with other interested organisations e.g. LLFA and EA to be involved in the development of any revised policies relating to flood risk, drainage, SuDS, and wastewater infrastructure to replace policy LP14 of the adopted Local Plan in advance of formal public consultation.

50011

Consultee		Agent	
Title		Title	
First Name	Alex	Name	
Surname	Patrick	Surname	
Position		Position	
Organisation	Alexandra Design	Organisation	

50011-34 **26a) Do you have any views on how new development could reduce flood risk?**

EA should review all mapping and flood zones, some levels of zones aren't true to the land levels

Question 26: Flood and Water Management

50040

Consultee

Title Mrs
First Name J
Surname Richardson
Position
Organisation Benwick Parish Council

Agent

Title
Name
Surname
Position
Organisation

50040-65 **26a) Do you have any views on how new development could reduce flood risk?**

Recycle water, reduce hard landscaping, and increase soakaways and balancing ponds.

50082

Consultee

Title
First Name Bryan
Surname Rose
Position
Organisation

Agent

Title
Name
Surname
Position
Organisation

50082-66 **26a) Do you have any views on how new development could reduce flood risk?**

Independent surveys must be undertaken before any development is considered.

50075

Consultee

Title
First Name Pam
Surname Shippey
Position
Organisation

Agent

Title
Name
Surname
Position
Organisation

50075-35 **26a) Do you have any views on how new development could reduce flood risk?**

Give planning permission more readily rather than using the objection of the potential build being in flood zone 3. It is unhelpful to randomly refuse planning permission on these grounds....so much of Fenland is zone 3. There are flood defences in Wisbech and these should be regularly upgraded.

Question 26: Flood and Water Management

50043

Consultee

Title

First Name Tim

Surname Slater

Position

Organisation Peter Humphrey Associates

Agent

Title

Name

Surname

Position

Organisation

50043-28 **26a) Do you have any views on how new development could reduce flood risk?**

The EA flood maps maps show the lowest lying areas of land- they do not intrinsically show those areas at most risk from flooding as the Fens are largely protected from flooding - and the EA maps do not take account of this.

The Fens is perhaps the most sophisticated and best understood water system in the country and has been managed as a water system for several hundred years, it is requested that FDC carry out a Strategic FRA taking into account the presence of physical an operational defences to properly assess risk of flooding as a basis of decision making as the EA maps do not assess risk or the likelihood of flooding in any given rainfall/ tidal situation.

50026

Consultee

Title Mr

First Name Jonathan

Surname Stone

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50026-67 **26a) Do you have any views on how new development could reduce flood risk?**

The CCG does not have a view on this

50088

Consultee

Title

First Name Richard

Surname Tester

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50088-64 **26a) Do you have any views on how new development could reduce flood risk?**

Yes. As water levels are naturally rising it is of great concern to me that even small developments are going ahead with concrete being the main material used. The proposal of a new development in Tydd St Giles is on a field which has, i understand, been previously refused planning permission due to flood worries.

Question 26: Flood and Water Management

50120

Consultee

Title

First Name

Surname This Land Limited

Position

Organisation

Agent

Title

Name Kimberley

Surname Brown MRTPI

Position

Organisation Carter Jonas LLP

50120-20 **26a) Do you have any views on how new development could reduce flood risk?**

Applications for new development would be required to assess flood risk and include a drainage strategy to manage surface water. It is considered that the introduction of drainage infrastructure and flood mitigation measures would reduce flood risk at potential development sites.

50034

Consultee

Title

First Name Katie

Surname Thornley

Position Senior Finance Manager

Organisation Cambridgeshire and Peterborough Sus Organisation

Agent

Title

Name

Surname

Position

50034-65 **26a) Do you have any views on how new development could reduce flood risk?**

We do not have a view on this.

50084

Consultee

Title

First Name

Surname Triman Developments (UK) Limited an

Position

Organisation

Agent

Title Mr

Name Simon

Surname Machen

Position

Organisation Barmach Ltd

50084-57 **26a) Do you have any views on how new development could reduce flood risk?**

Through sensitive, sustainable drainage design.

Question 26: Flood and Water Management

50030

Consultee

Title

First Name Kate

Surname Waller

Position

Organisation Elm Parish Council

Agent

Title

Name

Surname

Position

Organisation

50030-66 **26a) Do you have any views on how new development could reduce flood risk?**

The Council believes that simple principles should be applied such as not building on flood plains, the provision of self-balanced flood management schemes for large developments and the provision/protection/maintenance of drainage ditches and dykes

50024

Consultee

Title Mr

First Name Lawrence

Surname Weetman

Position Chairman

Organisation Chatteris Past, Present & Future

Agent

Title

Name

Surname

Position

Organisation

50024-57 **26a) Do you have any views on how new development could reduce flood risk?**

We think that the planting of trees and retention of green spaces, natural green spaces and well-managed arable farmland is likely to have a positive effect in this regard.

Trees and Flood Risk: <https://www.woodlandtrust.org.uk/publications/2016/02/trees-and-flood-risk-position-statement/>

50001

Consultee

Title

First Name Alan

Surname Wheeldon

Position

Organisation

Agent

Title

Name

Surname

Position

Organisation

50001-64 **26a) Do you have any views on how new development could reduce flood risk?**

Plant more trees. Surround developments with dykes and drainage ditches. Don't allow developments on low lying riverside areas. Leave some areas as natural flood plains that serve to take excess water and double up as nature reserves.

Question 26: Flood and Water Management

50107

Consultee

Title Mr
First Name Ray
Surname Whitwell
Position
Organisation

Agent

Title
Name
Surname
Position
Organisation

50107-62 **26a) Do you have any views on how new development could reduce flood risk?**
Prevent development to north of Whittlesey.

50047

Consultee

Title
First Name Geoff
Surname Wilkinson
Position
Organisation Wisbech St Mary Parish Council

Agent

Title
Name
Surname
Position
Organisation

50047-52 **26a) Do you have any views on how new development could reduce flood risk?**
Our drainage board is excellent.