

Draft Scarborough Borough Local Plan

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Comment by	Environment Agency (Ms Bev Lambert)
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Response

General flood risk comments: The council should look at the sites in a sequential manner and look to allocate all development sites wholly within flood zone 1 and outside of flood zones 2 and 3. Where sites are being put forward that have multiple flood zones, then a sequential approach to those sites must be taken, with areas that lie within flood zones 2 or 3 being used for green infrastructure / open space. For any development sites, located in flood zone 1 which are 1 hectare in size or more, a flood risk assessment (FRA) will be required in line with the NPPF. This should pay particular attention to drainage. For further information / guidance regarding the requirements for an FRA applicants should refer to the Environment Agency Website. For any greenfield sites there must be no increase in surface water run-off. As a minimum we would expect to see any surface water discharge restricted to the existing greenfield run-off rate. If not calculated, then the greenfield run-off from a 1 in 1 year storm (1.4 l/s/ha) should be used. Applicants must also provide sufficient attenuation and long term storage at least to accommodate a 1 in 30 year storm. The design should also ensure that storm water resulting from a 1 in 100 year event, plus 30% to account for climate change, and surcharging the drainage system can be stored on the site without risk to people or property and without overflowing into the watercourse. For any brownfield sites being put forward for redevelopment there must be no increase in surface water run-off from the site. As a consequence of climate change and recommendations in the Pitt Review we would expect to see as a minimum a 30% reduction in surface water discharge, for any new development, from the site. Further consideration should be given to further regulating the discharge to the greenfield run-off from a 1 in 1 year storm (1.4 l/s/ha) to provide a betterment in terms of flood risk. The same attenuation and storage requirements for greenfield sites would apply to brownfield sites. We are keen to promote the use of sustainable drainage systems (SuDS) and draw attention to Paragraph 103 of the NPPF. SuDS tackle surface water run-off problems at source using features such as soakaways, permeable pavements, grassed swales, infiltration trenches, ponds and wetlands, and, green roofs to attenuate flood peak flows, produce water quality improvements and environmental enhancements. We seek to promote the use of SuDS techniques to any sites put forward and would expect the developer of those sites to submit detailed investigations such that the use of SuDS has been fully explored. General Groundwater comments: The policy for some of the site allocations includes the following: ?It will have to be demonstrated that the site will not adversely affect the water source potentially through the submission of appropriate evidence (Hydrogeological Risk Assessment).? We would like to suggest the following change to this bullet point for each housing allocation statement that it appears in. The allocated land is in a groundwater Source Protection Zone

1. It will have to be demonstrated that the development does not have an unacceptable adverse impact on groundwater and the drinking water abstraction points for Scarborough. This will be done via the submission of appropriate evidence in the form of a Hydrogeological Risk Assessment. This comment is attached to some of the allocation statements in Source Protection Zone 1. We would like to see this comment attached to all housing developments in SPZ1.