

Appendix A - Planning Policy and Flood Risk Management Final

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Prepared for:
Huntingdonshire District Council



www.jbaconsulting.com

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A The Planning Policy and Flood Risk Management

A.1 Introduction

The main purpose of this section of the SFRA is to provide a brief overview of the key planning and flood risk policy documents that have shaped the current planning framework. This section also discusses the LLFA's and LPA's responsibilities and duties in respect to managing local flood risk including but not exclusive to the delivery of the requirements of the Flood Risk Regulations (FRR) 2009 and the Flood and Water Management Act (FWMA) 2010.

Figure 1 illustrates the links between legislation, national policy, statutory documents, and assessment of flood risk. The figure shows that whilst the key pieces of legislation and policy are separate, they are closely related, and their implementation should aim to provide a comprehensive and planned approach to asset record keeping and improving flood risk management within communities.

It is intended that the non-statutory Surface Water Management Plans (SWMPs) and SFRA's can provide much of the base data required to support the delivery of the LLFA's statutory flood risk management tasks as well supporting local authorities in developing capacity, effective working arrangements and informing Local Flood Risk Management Strategies (LFRMS) and Local Plans, which in turn help deliver flood risk management infrastructure and sustainable new development at a local level. This SFRA should be used to support the updating of the Local Plan and to help inform planning decisions.

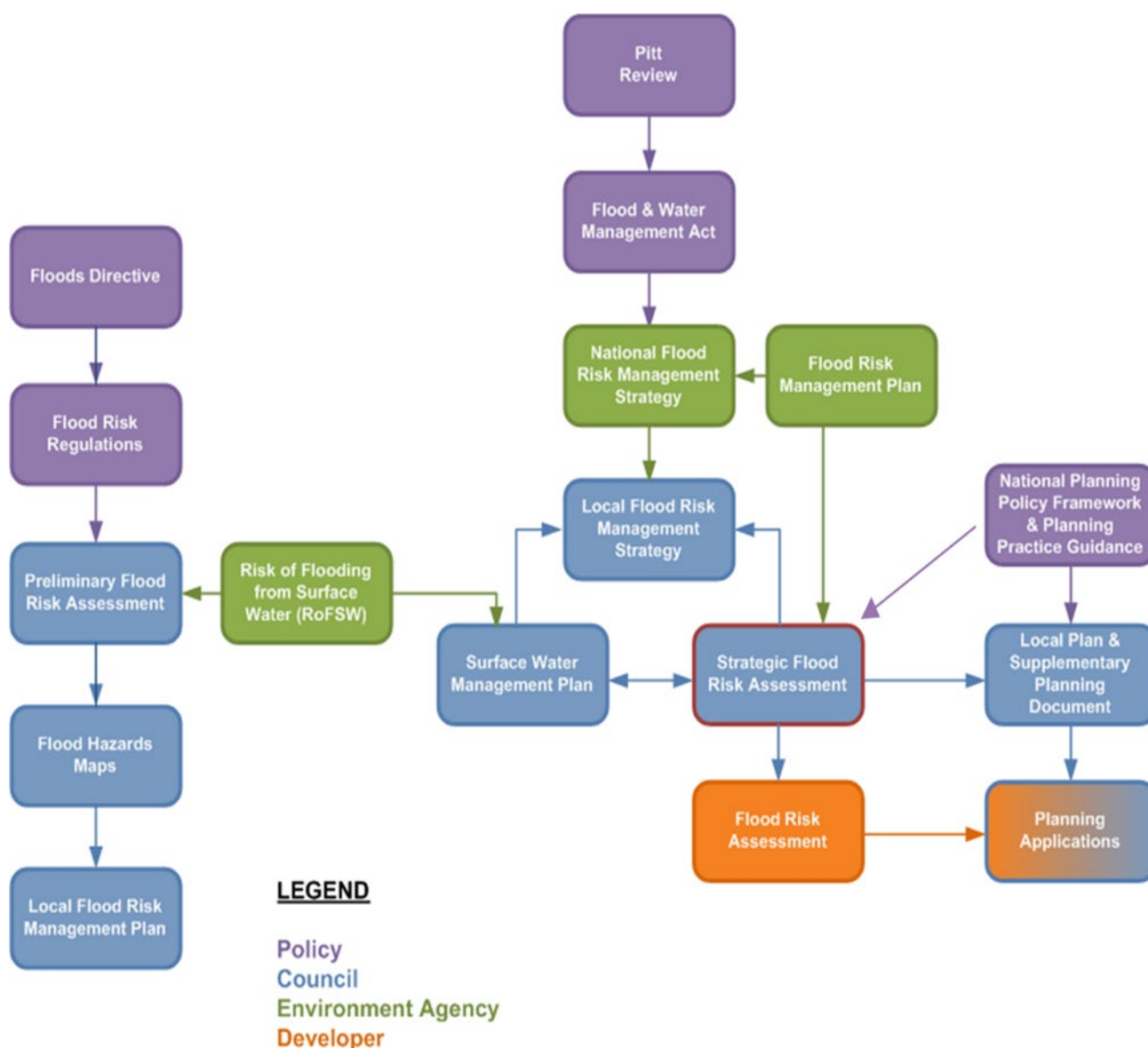


Figure 1: Key documents and strategic planning links with flood risk

A.2 Legislation

A.2.1 Flood Risk Regulations (2009)

The Flood Risk Regulations (FRR) 2009 are the interpretation of the EU Floods Directive 2007 into England’s legislation. The FRR set out UK Government’s approach to managing flood risk and aim to improve the management of the risk that floods pose to human health, the environment, cultural heritage and economic activity. The FRR require LLFAs and the EA to produce Preliminary Flood Risk Assessments (PFRA) over a repeating 6-year cycle with the aim of identifying significant Flood Risk Areas; preparing flood hazard and risk maps; and subsequent Flood Risk Management Plans

(FRMPs). The second six-year cycle was completed in December 2021 and the third six-year cycle is currently underway at the time of writing. More information can be found on the EA website¹.

At the time of this review (October 2023) it is understood that the UK Government intends to scrap the Flood Risk Regulations 2009 as part of a review into retained EU legislation. It is proposed to scrap this by 31 December 2023, as the Flood Risk Regulations duplicate existing domestic legislation, namely the Flood and Water Management Act 2010.



Figure 2: Flood Risk Regulations

PFRA should cover the entire LLFA area for local flood risk accounting for ordinary watercourses, surface water and groundwater flooding. Where the PFRA identifies significant Flood Risk Areas using the national approach (and locally reviewed), the LLFA is then required to undertake flood risk hazard mapping and to produce a FRMP for the significant Flood Risk Area as illustrated in Figure 2.

The EA is responsible for producing FRMPs for significant Flood Risk Areas that cover main rivers, the sea and reservoirs. However, the preferred approach is for the EA and LLFAs to work together to produce one FRMP for all sources of flood risk for the river basin district (RBD). This arrangement is agreed between the EA and the LLFAs involved before work starts. A FRMP has therefore been completed by the EA for the

¹ Planning stages to manage flood risk, 2022

Anglian RBD. See Section A.2.3. FRMPs also meet the aims of the National Flood and Coastal Erosion Strategy for England.

The EA has implemented one of the exceptions for creating PFRAs, etc. for Main Rivers and coastal flooding, as they already have mapping, i.e. Flood Map for Planning (Rivers and Sea), Risk of Flooding from Rivers and Sea Map, flood modelling, and plans i.e. CFMPs, SMPs in place to deal with this. The EA has therefore focused its efforts on assisting LLFAs through this process.

A.2.2 Cambridgeshire Preliminary Flood Risk Assessments (PFRAs) 2011 and 2017²

The second cycle PFRA was prepared in 2017 as an addendum to the 2011 PFRA. The 2017 update used all relevant current flood risk data and information to assess whether any flood events had changed the understanding of significant flood risk in the LLFA area since 2011. During the second planning cycle, three FRAs were identified in Cambridgeshire. One of which was identified within Huntingdonshire i.e., Huntingdon.

A.2.3 Flood Risk Management Plans

Flood Risk Management Plans (FRMPs) are designed to set out the risk of flooding from all sources within each RBD and to detail how Risk Management Authorities (RMAs) will work with communities to manage flood risk over the 6-year cycle. FRMPs consider objectives for flood risk management (reducing the likelihood and consequences of flooding) and measures to achieve those objectives.

Both the River Basin Management Plans (RBMP) and FRMPs have been developed by the EA in tandem to ensure that flood defence schemes can provide wider environmental benefits during the same six-year cycle. Both flood risk management and river basin planning form an important part of a collaborative and integrated approach to catchment planning for water. RBMPs are a requirement of The Water Environment Regulations 2003 (see Section A.2.4).

Updated EA guidance on how to prepare FRMPs is available online via:

[Flood risk management plans \(FRMPs\): how to prepare them](#)

HDC is located entirely within the Anglian RBD.

Anglian River Basin District Flood Management Plan, 2022³

Huntingdonshire is located within the Anglian RBD, which covers an area of approximately 27,900 km². Over 6.4 million people live and work within the RBD, which

² Preliminary Flood Risk Assessment: Cambridgeshire County Council, 2017

³ Anglian River Basin District Flood Risk Management Plan 2021 to 2027, December 2022

extends from Lincolnshire in the north to Essex in the south and from Northamptonshire in the west to the east coast of Norfolk, Suffolk and Essex.

The Anglian RBD comprises 14 EA management catchments.

Twenty eight Flood Risk Areas have been identified within the Anglian RBD including 16 areas at significant risk of flooding from main rivers and the sea and 8 at significant risk of flooding from surface water including Huntingdon.

Huntingdon Surface Water Flood Risk Area

CCC reported Huntingdon as a surface water FRA, through the second cycle PFRA in 2017. Huntingdon is a market town within HDC with a population of approximately 25,000 people. In the Huntingdon FRA, 4,512 people live within areas at risk of flooding from surface water. Of these, 5% are considered to live within areas at high risk.

The measures that have been put in place to help manage flood risk within the Huntingdon FRA include:

- To assess future flood risk in Huntingdon,
- To prioritise the need for flood risk management interventions in Huntingdon.

LLFAs are responsible for national-level measures that apply to every FRA for surface water, these include both statutory and optional measures. National measures, which apply to the Huntingdon FRA include:

Protection:

- Designate third party flood risk assets and maintain a register of designated flood risk assets in their area,
- Plan flood risk management projects to achieve wider environmental benefits where appropriate in their area,
- Regulate the condition of and third party activity on ordinary watercourses and review new works on ordinary watercourses in their area,
- Take a risk based approach to develop and maintain a register of flood risk assets/features in their area,
- Work with other flood asset owners and riparian landowners to raise awareness of, and where necessary enforce, maintenance responsibilities in their area,
- Work with other risk management authorities to identify a programme of nature based approaches in their area,
- Work with other risk management authorities to support the delivery of flood projects in their area.

Prevention:

- Act as a consultee for major planning applications in their area,
- Implement relevant government guidance on taking climate change into account where necessary for flood risk decision making in their area,

- Maintain, keep under review, apply and monitor a local flood risk management strategy in their area,
- Provide information to inform spatial and infrastructure planning, development and regeneration in their area,
- Start implementing steps to work towards net zero carbon in their area,
- Work in partnership with other risk management authorities to reduce the risk of flooding from all sources in their area,
- Work with other risk management authorities to provide information where necessary to update flood maps in their area.

Recovery and Review:

- Investigate local flood events where appropriate and necessary in their area,
- Work with others to support communities through the recovery phase of a significant flood event in their area.

Preparedness:

- Support communities to increase their resilience to flooding in their area,
- Support emergency response partners and communities to plan, prepare and exercise for future flood scenarios in their area.

A.2.4 Flood & Water Management Act (2010)

The Flood and Water Management Act (FWMA) was established in April 2010. It aims to improve both flood risk management and the way we manage our water resources.

The FWMA has created clearer roles and responsibilities and helped to define a more risk-based approach to dealing with flooding. This included the creation of a lead role for local authorities as LLFAs, designed to manage local flood risk (from surface water, groundwater and ordinary watercourses) and to provide a strategic overview role of all flood risk for the EA.

The content and implications of the FWMA provide considerable opportunities for improved and integrated land use planning and flood risk management by LAs and other key partners. The integration and synergy of strategies and plans at national, regional and local scales, is increasingly important to protect vulnerable communities and deliver sustainable regeneration and growth.

The FWMA gives RMAs specific powers and duties for local flood risk management. A duty is something the RMA is legally obliged to do; a permissive power can be used at the RMA's discretion. All RMAs have a duty under Section 13 of the FWMA to cooperate with one another when exercising functions relating to flood and coastal erosion risk management.

Table 1 provides an overview of the key LLFA duties and powers under the FWMA.

Table 1 Key LLFA responsibilities under the FWMA

| FWMA duty / power | Description of duties and powers | LLFA status |
|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Duty to produce a local strategy for flood risk management | The LLFA must develop, maintain, apply and monitor a local strategy for flood risk management in its area. The local strategy will build on information such as national risk assessments and will use consistent risk-based approaches across different LA areas and catchments. The local strategy should not be secondary to the national strategy; rather it will have distinct objectives to manage local flood risks important to local communities. | Cambridgeshire Council's Local Flood Risk Management Strategy approved in March 2022 (see Section 3.2.2.1). |
| Duty to comply with the National Strategy | The LLFA has a duty to comply with national flood and coastal risk management strategy principles and objectives in respects of its flood risk management functions. | Ongoing |
| Duty to contribute to sustainable development | The LLFA has a duty to contribute towards the achievement of sustainable development. | Ongoing |

| FWMA duty / power | Description of duties and powers | LLFA status |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Investigating flood incidents | The LLFA, on becoming aware of a flood in its area, has (to the extent it considers necessary and appropriate) to investigate and record details of "locally significant" flood events within its area. This duty includes identifying the relevant RMAs and their functions and how they intend to exercise those functions in response to a flood. The responding RMA must publish the results of its investigation and notify any other relevant RMAs. | Ongoing. CCC has provided its LFRMS and Section 19 reports. |
| Asset Register | The LLFA has a duty to maintain a register of structures or features, which it considers to have a significant effect on flood risk, including details on ownership and condition as a minimum. The register must be available for inspection and the Secretary of State will be able to make regulations about the content of the register and records. | Ongoing |
| Duty to co-operate and Powers to Request Information | The LLFA must co-operate with other relevant authorities in the exercise of their flood and coastal erosion management functions. The LLFA has powers to request information as necessary (e.g., from Anglian Water) under the FWMA. | Ongoing |

| FWMA duty / power | Description of duties and powers | LLFA status |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Ordinary Watercourse Consents | The LLFA has a duty to deal with enquiries and determine watercourse consents where the altering, removing or replacing of certain flood risk management structures or features that affect flow on ordinary watercourses is required. It also has provisions or powers relating to the enforcement of unconsented works and non-maintenance by riparian owners. | Ongoing |
| Works Powers | The FWMA provides the LLFA with powers to undertake works to manage flood risk from surface runoff, groundwater and ordinary watercourses, consistent with the LFRMS for the area. | Ongoing |
| Designation Powers | The FWMA provides the LLFA with powers to designate structures and features that affect flooding or coastal erosion. The powers are intended to overcome the risk of a person damaging or removing a structure or feature that is on private land and which is relied on for flood or coastal erosion risk management. Once a feature is designated, the owner must seek consent to alter, remove, or replace it. | Ongoing |

| FWMA duty / power | Description of duties and powers | LLFA status |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| Emergency Planning | The LLFA is required to play a lead role in emergency planning and recovery after a flood event. | Cambridgeshire and Peterborough Resilience Forum (see Section 5.9.1.1) |
| Community Involvement | The LLFA should engage local communities in local flood risk management issues. This could include the training of community volunteers, the development of local flood action groups and the preparation of community flood plans, and general awareness raising around roles and responsibilities. | Various ongoing |

| FWMA duty / power | Description of duties and powers | LLFA status |
|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SuDS | <p>SuDS are a planning requirement for major planning applications of 10 or more residential units or equivalent commercial development schemes with sustainable drainage. The LLFA is a statutory planning consultee and it will be between the LPA and the LLFA to determine the acceptability of these proposed sustainable drainage schemes. Approvals must be given before the developer can commence construction, and sometime before the occupation of dwellings. Planning authorities should use planning conditions or obligations to make sure that arrangements are in place for ongoing maintenance of the SuDS over the lifetime of the development.</p> | <p>National Planning Policy and Defra’s non-statutory technical standards should be followed. Local SuDS guidance for CCC should be followed. The anticipated enactment of Schedule 3 of the FWMA would make CCC a SuDS adopting body, which could impact on the approval and delivery process for drainage assets on new developments.</p> |
| Latest changes to FWMA legislation ⁴ | | |

A.2.5 National and Local Flood Risk Management Strategies

The FWMA establishes how flood risk will be managed within the framework of National Strategies for England and Local Strategies for each LLFA area. The EA has a statutory duty to develop, maintain, apply, and monitor a strategy for England. The EA adopted the National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England on 25 September 2020 and updated it in June 2022, at the time of writing.

The National Strategy sets out principles for how flood risk should be managed and provides strategic information about different types of flood risk and which organisations are responsible for their effective management. The Strategy sets out the

⁴ Flood and Water Management Act, 2010

long-term delivery objectives the nation should take over the next 10 to 30 years as well as shorter term, practical measures RMA's should take working with partners and communities.

Cambridgeshire Flood Risk Management Strategy 2021 - 2027⁵

CCC's Flood Risk Management Strategy (FRMS) was approved in March 2022 and sets out CCC's strategy for managing local flood risk for the period 2021 to 2027. The aim of the Local Strategy is to ensure the overall context of the National Strategy is met through the management of flood risk across Cambridgeshire. As LLFA, CCC coordinates all local Flood Risk Management activities.

The FRMS provides an overall picture of flood risk across Cambridgeshire and outlines how the LLFA will coordinate and manage flood risk along with other RMA's. The Strategy sets out the policy direction for flood defence consenting, thresholds for formal flood investigations, formal partnership and management arrangements, details regarding the asset register, and a great deal of general advice and guidance relating to flood mitigation and resilience.

As LLFA, CCC has developed the following five key objectives to manage the various forms of local flooding in Cambridgeshire in accordance with the FWMA:

- Objective 1 - Understanding flood risk in Cambridgeshire,
- Objective 2 - Managing the Likelihood of flooding,
- Objective 3 - Helping Cambridgeshire's citizens to manage their own risk,
- Objective 4 - Ensuring appropriate development in Cambridgeshire,
- Objective 5 - Improving flood prediction, warning, and post flood recovery.

A.2.6 Anglian (Great Ouse) Regional Flood and Coastal Committee

CCC is a member of the Anglian (Great Ouse) Regional Flood and Coastal Committee (RFCC). The RFCC, established by the EA, brings together relevant members appointed by LLFAs to:

- Ensure there are coherent plans for identifying, communicating and managing flood and coastal erosion risks across catchments and shorelines,
- Encourage efficient, targeted and risk-based investment in flood and coastal erosion risk management that represents value for money and benefits local communities,
- Provide a link between the EA, LLFA, other RMA's, and other relevant bodies to build understanding of flood and coastal erosion risks in its area.

⁵ Cambridgeshire Flood Risk Management Strategy 2021-2027

A.2.7 Schedule 3 of the FWMA

Schedule 3 to the FWMA gained Royal Assent in 2020. The schedule, which incorporates recommendations from the 2008 Pitt review, provides a framework for the approval and adoption of drainage systems via a SuDS Approving Body (SAB), and national standards on the design, construction, operation, and maintenance of SuDS. It also makes the right to connect surface water runoff to public sewers conditional, upon the drainage system being approved prior to the commencement of construction work.

In England, Schedule 3 has not yet commenced at the time of writing due to the changes in planning policy associated with the increased use of SuDS, which was implemented by the Government in April 2015. Current planning policy requires SuDS to be included in all new major developments (more than 10 homes) unless in the case of exceptional circumstances. In these instances, clear evidence is required to support the application. This is in addition to the requirement for SuDS to be given priority in new developments in flood risk areas.

An independent review into the implementation of Schedule 3 was commissioned by Government and published in January 2023⁶. The review was asked to identify the benefits and impacts of making SuDS mandatory for new development to ensure that its implementation would help in addressing the pressures of climate change, increasing population and urbanisation whilst achieving multiple benefits, such as reducing surface and sewer flood risk, improving water quality, and harvesting rainwater to meet current and future needs.

The review concluded that the delivery of SuDS should not be made entirely through the planning process and recommended that Schedule 3 be implemented subject to final decisions on scope, threshold, and process. This is expected to apply to all developments of more than one property. Government has accepted the recommendations. At the time of writing, the consultation is scheduled to be completed in 2023 with the implementation of Schedule 3 expected in 2024.

A.2.8 Water Framework Directive

The purpose of the Water Framework Directive (WFD), which was transposed into English Law by the Water Environment Regulations (2003), is to deliver improvements in the management of water quality and water resources through RBMPs, which were first published in 2015 and updated in 2021. Huntingdonshire lies within the Anglian River Basin District.

⁶ The review for implementation of Schedule 3 to The Flood and Water Management Act 2010

A.2.9 River Basin Management Plans

The HDC administrative area is covered by the Anglian River Basin Management Plan, managed by the EA. The latest version of the RBMP was published in December 2022⁷.

Water quality and flood risk can go hand in hand in that flood risk management activities can help to deliver habitat restoration techniques. The Anglian RBMP includes such examples whereby land management techniques have been designed to reduce flood risk whilst also reducing sediment loss and improving water quality. The EA is responsible for monitoring and reporting on the objectives of the WFD on behalf of Government. They work with Government, Ofwat, local government, non-governmental organisations (NGOs) and a wide range of other stakeholders including local businesses, water companies, industry and farmers to manage water.

The RBMPs, like the FRMPs, are important documents relevant to the development of the SFRA. The SFRA should take into account the wider catchment flood cell aims and objectives and understand how it can potentially contribute to the achievement of them.

The main responsibility for CCC as LLFA is to work with the EA to develop links between river basin management planning and the development of local authority plans, policies and assessments.

The general programme of actions (measures) within the Anglian RBMP, which are relevant to HDC include:

- Working with Anglian Water and Lead Local Flood Authorities
- Working with Natural England,
- Investigating potential future changes in the climate change allowances,
- Working together to develop and implement collaborative strategic plans.

The full list of measures can be accessed via Defra's Flood Plan Explorer⁸.

A.3 Planning Policy

A.3.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published in March 2012 and received a significant revision in July 2018. The latest update took place in July 2021. The NPPF sets out Government's planning policies for England and how these are expected to be applied. The Framework is based on core principles of sustainability and forms the national policy framework in England. It must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The NPPF is accompanied by a number of Planning Practice Guidance (PPG) notes.

⁷ Flood Plan Explorer: Anglian River Basin District

⁸ Flood Plan Explorer: Anglian River Basin District

A.3.2 Flood Risk and Coastal Change Planning Practice Guidance

The FRCC-PPG was first published in March 2014 and updated in August 2022 to reflect the changes to the NPPF as outlined in Section 3.3.1. The current FRCC-PPG is available online via:

Flood risk and coastal change

Whilst the NPPF concentrates on high level national policy, the FRCC-PPG is more detailed. The practice guidance advises on how planning can take account of the risks associated with flooding and coastal change in plan making and the development management process. This is in respect of local plans, SFRA's, the sequential and exception tests, permitted development, site-specific flood risk, Neighbourhood Planning, flood resilience and resistance techniques and the vulnerability of development to make development safe from flooding. See Sections 5.2 and 5.3 of the main report for information on the sequential approach to delivering sustainable development and details on the sequential and exception tests.

A.3.3 Local Plans

A Local Plan is a statutory document prepared in consultation with the local community. It is designed to promote and deliver sustainable development. Local Plans must set out a clear vision, be kept up to date and set out a framework for future development of the local area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure as well as safeguarding the environment and adapting to climate change and securing good design.

Local Plans set the context for guiding decisions and development proposals and, along with the NPPF, set out a strategic framework for the long-term use of land and buildings, thus providing a framework for local decision making and the reconciliation of competing development and conservation interests.

The NPPF requires that the evidence base for the Local Plan must clearly set out what is intended over the lifetime of the plan, where and when this will occur and how it will be delivered. The NPPF states that Local Plans should be supported by a SFRA and should take account of advice provided by the EA and other flood risk management bodies. This SFRA should be used to ensure that when allocating land through the local plan or determining planning applications, development is located in areas at lowest risk of flooding. Policies to manage, mitigate and design appropriately for flood risk should be written into the Local Plan, informed by both this SFRA and the Sustainability Appraisal.

Government guidance on plan making can be found online⁹.

⁹ Guidance on plan-making, Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, October 2021

Huntingdonshire Local Plan¹⁰

At the time of writing, Huntingdonshire is commencing the new Local Plan cycle. The emerging Local Plan will replace the existing Plan adopted on 15 May 2019. A full update to the existing Local Plan was agreed on 24 January 2023. A baseline of sites is due to be proposed in Summer 2023. It is anticipated that consultation on these will take place in mid-2024 with the preferred options plan scheduled to take place mid-2025. Pre-submission of the new Local Plan is expected to take place early in 2027.

A.3.4 Sustainability Appraisals

The Sustainability Appraisal (SA) is a key component of the Local Plan evidence base, ensuring that sustainability issues are addressed during the preparation of local plans. The SA is a technical document which must meet the requirements of the Strategic Environmental Assessment Directive 2001/42/EC which assesses and reports on a plan's potential impact on the environment, economy, and society. The SA carries out an assessment of the draft policies at various stages throughout the preparation of the Local Plan, and does this by testing the potential impacts, and consideration of alternatives are tested against the plan's objectives and policies. This ensures that the potential impacts from the plan on the aim of achieving sustainable development are considered, in terms of the impacts, and that adequate mitigation and monitoring mechanisms are implemented.

The Cheshire East Local Plan Sustainability Appraisal Scoping Report was updated in 2017¹¹. Key environmental SA objectives identified in Huntingdonshire and relevant to flood risk include:

- Minimise development on greenfield land, maximise development on previously developed land or land with the lowest agricultural value
- Manage and minimise all forms of flood risk
- Protect water resources (both quality and quantity)

A.3.5 Cambridgeshire Flood and Water Supplementary Planning document (SPD)¹²

The Cambridgeshire Flood and Water SPD, adopted in 2016, provides guidance on the approach that should be taken to design new developments to manage flood risk and to include SuDS. The aim of the SPD is to highlight the approach that should be taken to manage the water environment as part of new development proposals. It ensures that Cambridgeshire uses a consistent and locally appropriate approach to flood and water management.

¹⁰ Huntingdonshire Local Plan to 2036

¹¹ Huntingdonshire Local Plan Final Sustainability Appraisal, 2017

¹² Cambridgeshire Flood and Water Supplementary Planning document, 2016

A.3.6 Catchment Flood Management Plans (2009)

The CFMPs were carried out by the EA in 2009 and were designed to establish flood risk management policies which will deliver sustainable flood risk management for the long term. The CFMPs were used by the EA to help direct resources to where there were areas of greatest risk and helped the EA and its partners to plan and agree the most effective way to manage flood risk in the future.

FRMPs were designed to replace the CFMPs following the implementation of the Flood Risk Regulations in 2009. However, the CFMPs are still considered a useful reference tool in flood risk management. The CFMPs contain useful information on how the catchments work, previous flooding and the sensitivity of the river systems to increased rainfall. The EA draws on the evidence and previous measures and proposals set out in the CFMPs to help develop the FRMPs for river basin districts.

A.3.7 National Flood Resilience Review (2016)¹³

The National Flood Resilience Review was established by Defra in September 2016, following Storm Desmond in 2015, to review how flood risk is assessed, how the likelihood of flooding can be reduced and to try and make the country as resilient as possible to flooding. The review aligns closely with Defra's work on integrated catchment-level management of the water cycle in the Government's 25-year Environment Plan.

A.3.8 25 Year Environment Plan (2018)

This Plan sets out Government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first. The Plan also sets out how Government will tackle the effects of climate change, considered to perhaps be the most serious long-term risk to the environment given higher land and sea temperatures, rising sea levels, extreme weather patterns and ocean acidification. The Plan aims to show that Government will work with nature to protect communities from flooding, slowing rivers and creating and sustaining more wetlands to reduce flood risk and offer valuable habitats.

Focusing on flood risk, Government has updated the national flood and coastal erosion risk management strategy for England (see Section A.2.5) which looks to strengthen joint delivery across organisations. The Plan states that the EA will use its role in statutory planning consultations to seek to make sure that new developments are flood resilient and do not increase flood risk.

¹³ National Flood Resilience Review, September 2016

For flood mitigation, Government will focus on using more natural flood management solutions; increasing the uptake of SuDS, especially in new development; and improving the resilience of properties at risk of flooding and the time it takes them to recover should flooding occur.

A.3.9 Surface Water Management Plans

In June 2007, widespread flooding was experienced in the UK. The Government review of the 2007 flooding, chaired by Sir Michael Pitt recommended that...

“...Local Surface Water Management Plans (SWMPs) ...coordinated by local authorities, should provide the basis for managing all local flood risk.”

The Government’s SWMP Technical Guidance document¹⁴, 2011, defines a SWMP as:

- A framework through which key local partners with responsibility for surface water and drainage in their area, work together to understand the causes of surface water flooding and agree the most cost-effective way of managing surface water flood risk.
- A tool to facilitate sustainable surface water management decisions that are evidence based, risk based, future proofed and inclusive of stakeholder views and preferences.
- A plan for the management of urban water quality through the removal of surface water from combined systems and the promotion of SuDS.

The strategic SWMP for Cambridgeshire was produced in 2011 by the Cambridgeshire Flood Risk Management Partnership (CFRMP). The plan was subsequently updated in 2014¹⁵ following a SWMP countrywide update. The 2014 update focused on building on the methods and information of the previous SWMP following which, several recommendations were made.

A.3.10 St Neots SWMP (2012)¹⁶

The St Neots SWMP was carried out in order to:

- Better understand the risks and consequences of surface water flooding in St Neots
- Meet or significantly assist in meeting some of the requirements on CCC as Lead Local Flood Authority under the Flood Risk Regulations 2009

14 Surface water management plan technical guidance, June 2011

15 Cambridgeshire County Council Surface Water Management Plan, Countrywide Update, 2014

16 CFRMP, St Neots Surface Water Management Plan, 2012

- Meet a number of the requirements of the Flood and Water Management Act specifically in terms of developing an asset register and producing a local flood risk management strategy

A number of engineering options were tested and assessed in terms of flood risk and economic benefits. These engineering solutions were designed to improve local flood risk rather than improve flood risk for the whole of St Neots. The findings of the study led to a number of recommendations for further investigation/ consideration.

A.3.11 Water Cycle Studies

The purpose of a Water Cycle Study (WCS) is to investigate whether the local water environment has the capacity to support planned levels of growth and provide a comprehensive and robust evidence to support Local Plan production.

To achieve this, the WCS investigates the capability of the water and sewerage suppliers to provide the services to enable housing and economic growth and identify key risks to the timing of housing delivery and impacts on customers and the local environment. A WCS is certainly useful in the Local Plan Examination, where there is large growth and urban expansion planned within a local authority area.

A water cycle study was completed for the HDC authority area in 2014¹⁷. An Integrated Water Management Study is being prepared by JBA Consulting for Huntingdonshire District Council as an update to the Water Cycle Study at the same time as this Level 1 SFRA.

A.3.12 Green Infrastructure and Open Space assessments

Open space, or Green Infrastructure (GI), should be designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities and should be provided as an integral part of all new development, alongside other infrastructure such as utilities and transport networks. Open greenspace can be used to mitigate flood risk.

Local plans should account for increased flood risk, resulting from climate change, through the planning of GI. GI can have an important role to play in reducing the likelihood of flooding by providing space for flood storage, reducing runoff and increasing infiltration, whilst also providing social and economic benefits.

Alongside GI should be the implementation of SuDS (see Section 5.7). The suitability of GI and SuDS can be informed by this SFRA through utilisation of open space for water in the areas of greatest flood risk, which would be key to helping deliver sustainable development.

Examples include:

¹⁷ HDC Water Cycle Study, December 2014

- Restoration of natural character of floodplains;
- Reduction of downstream flood risk through upstream water storage;
- Preserving of areas of existing natural floodplain; and
- Introduction of new areas and enhancing existing areas of greenspace whilst incorporating sustainable drainage within new development.

The Town and Country Planning Association together with the Wildlife Trusts produced a guidance document for Green Infrastructure¹⁸. The guidance states that local plans should identify funding sources for GI and provision should be made for GI to be adequately funded as part of a development's core infrastructure. For new developments, GI assets can be secured from a landowner's 'land value uplift' and as part of development agreements. LPAs may include capital for the purchase, design, planning and maintenance of GI within the Community Infrastructure Levy (CIL) programme.

A.3.13 Flood risk and catchment partnerships

CCC has been involved in the development of several partnerships designed to provide collaboration between public agencies, businesses and the community. Partnerships and plans that affect Huntingdonshire include:

- Cambridgeshire and Peterborough Local Resilience Forum (CPLRF),
- Cambridge and Peterborough Flood and Water Management Partnership,
- CPLRF Risk Register,
- Anglian Great Ouse Flood and Coastal Committee,
- Water Care Partnership,
- River Nene Regional Partnership,
- Cam and Ely Ouse Partnership,
- Upper and Bedford Ouse Catchment Partnership,
- Flood warning and awareness in partnership with the EA,
- Local flood plans,
- Key businesses and organisations.

¹⁸ Planning for a Healthy Environment - Good Practice Guidance for Green Infrastructure and Biodiversity, Published by the Town and Country Planning Association and The Wildlife Trusts, July 2012

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Registered Office
1 Broughton Park
Old Lane North
Broughton
SKIPTON
North Yorkshire
BD23 3FD
United Kingdom

+44(0)1756 799919
info@jbaconsulting.co
m
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