

Statement G Policy DEV2 - Water Management and Flood Risk

Is the Policy Effective and Consistent with National Policy and Guidance?

- 1.0 Is the policy sufficiently precise in its treatment of Sustainable Drainage Systems?
- 1.1 No, Story Homes do not consider it to be worded appropriately in terms of SUDS. The policy itself only refers to new development above a “certain scale”. No clarity is provided in the policy in terms of the threshold which constitutes a “certain scale”. The supportive text refers to “major development”, however, further clarification in terms of the policy wording is required, as it is not considered to be sound as it is inconsistent with national policy.
- 1.2 We would also raise concerns with the word ‘must’ which prescribes adherence to the measures listed in DEV2 and SUDS. NPPF does not prescribe SUDS and therefore we suggest that DEV2 should be reworded, removing ‘must’ with ‘should have regard to’ as set out below:

New development must be located in a location which:

1. Avoids risks to the water supply, or includes sufficient mitigation measures to ensure there is no risk to water supply
2. Would not compromise the effectiveness of existing flood defences.
3. Meets the sequential approach to development in flood risk areas. Inappropriate development will not be permitted in flood zones 2 and 3, critical drainage areas or areas which have a history of groundwater flooding, or where it would increase flood risk elsewhere unless there is an overriding need and absence of suitable alternatives. If sites, as an exception, need to be developed in areas at risk of flooding, suitable flood protection measures will be required. Major development should be informed by a flood risk assessment.

New development above a certain scale **should have regard to (our emphasise)** Sustainable Drainage Systems (SuDS) to manage surface water run-off. Surface water should be discharged in the following order of priority:

1. An adequate soakaway or some other form of infiltration system
2. An attenuated discharge to the watercourse
3. An attenuated discharge to a public surface water sewer
4. An attenuated discharge to a public combined sewer.

2.0 Does the policy adequately avoid risks to the water supply?

- 2.1 No comment

**Eden District Council EIP Issues and Questions
Response on behalf of Story Homes - April 2016**

Summary

Is the policy effective and consistent with national policy and guidance?

The Policy is not consistent with national policy and guidance in its current form, as no clarity is provided as to what constitutes as a “certain scale”.

To be found sound, further clarification is required in terms of the policy wording to provide clarity to developers