



**BRENTWOOD
BOROUGH COUNCIL**

Local Plan 2015-2030

Preferred Options

July 2013

COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

Title:
Mr

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YOUR COMMENTS

Please indicate which section(s) of the Local Plan you are commenting on (please clearly state the Policy reference or paragraph number):

Policy DM35: Flood Risk

Please specify if you Support or Object (tick as appropriate):

Support

Object

Comments (please use additional sheet if required):

Whilst we are supportive of the inclusion of a flood risk policy, we consider the amendment below in italics, is necessary to ensure the policy complies with the National Planning Policy Framework (NPPF).

We consider that the 3rd paragraph of this policy should be re-worded as follows:

“In areas designated as functional flood plains, development will only be permitted *in accordance with the National Planning Policy Framework*, and then, only if:”

We consider the above wording is necessary to ensure that only Essential Infrastructure which can pass the Exception Test, and Water Compatible development, is allowed in Flood Zone 3b (functional flood plain). It is our opinion that this change will ensure the policy is consistent with Table 3 of the Technical Guidance to the NPPF and therefore ‘sound’. In the absence of this additional clarity there would seem to be a clear conflict with the guidance set out in the NPPF.

Further to our recommendation above, we also consider this policy would benefit from the addition of the text set out in italics below.

“The Council will work in partnership with the Environment Agency *and other Flood Risk Management Organisations, such as the Lead Local Flood Authority and Internal Drainage Boards* to manage and mitigate flood risk.

All proposals for new development will be required to pass the Sequential Test, which directs development to areas at lowest risk of flooding, and where applicable, the Exception Test. In addition, all development proposals in areas at risk of flooding will need to submit a Flood Risk Assessment (FRA) in accordance with Sustainable Drainage Policy DM36, commensurate with the scale of the flood risk and recognising all likely sources of flooding...

...Where development is permitted within flood risk areas it must demonstrate that, where required, it will reduce fluvial and surface water flood risk and manage residual risks through appropriate flood mitigation measures *including emergency planning and response.*”

Please return to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed form and email planning.policy@brentwood.gov.uk

Please note that all responses will be published online. More information can be found at www.brentwood.gov.uk/localplan

All responses should be received by Wednesday 2nd October 2013