

REVISED FLOOD RISK ASSESSMENT REPORT FOR ST/1109/21/FUL AT CLEADON LANE INDUSTRIAL ESTATE

RESPONSE BY EAST BOLDON NEIGHBOURHOOD FORUM

1 INTRODUCTION

In the Response to Documents submission, Lichfields for the Avant Homes argue that residential development at the site is wholly appropriate in flood risk terms.

This is because that the Environment Agency has withdrawn their objection to development in a letter dated 24 August 2022 to the Council.

EBNF continues to have concerns about this decision and sets out below issues which it requests the Council to review further.

Lichfields state that the previous surface water drainage proposals were reviewed by the Lead Local Flood Authority (LLFA), which is the Council, and were generally considered acceptable subject to clarification on certain points.

EBNF requests the Council as LLFA to undertake a further assessment of this revised Flood Risk Assessment report taking into account the comments below.

2 FLOOD RISK

When the application was first submitted in 2021, 50 % of the site was in Flood Zone 3 defined as high risk in National Planning Practice Guidance. This would require the applicants passing an exceptions test to be able to develop the site. Indeed, the Environment Agency maintained an in principle objection to development at this stage.

The applicants employed Envireau Water to assess the flood risk and review the accuracy of the Environment Agency Flood Maps. As a result the proposed development site was downgraded to Flood Zone 1 or low risk.

This study was reviewed by the Environment Agency, who has confirmed that the Flood Map for Planning will be updated in the coming months.

Other sources of flood risk were also assessed and the risk of flooding is considered low/manageable with mitigation.

EBNF is concerned how the site can be reclassified for planning purposes during the assessment of this planning application.

During previous assessments by the Local Planning Authority for the Strategic Land Review and Draft Local Plan, the potential for flood risk was always recognised.

3 SURFACE WATER (Pluvial) FLOODING

The Environment Agency Surface Water (Pluvial) Flood Map indicates that the site is at low risk. However the consultants go on to say that risk is associated with flood depths of mainly up to 300mm and in localised areas appearing to be circa 600mm.

They go to state that to assist in managing any surface water flooding in the event of overland flows dwellings should be located above road levels, therefore allowing the roads to act as routes to convey flows and avoid the risk to properties.

If this is an acceptable strategy, it would seem necessary for it to be made a planning condition so that it is enforceable etc.

They also state that the risk is associated with the main field drain at the centre of the site.

Lichfields state that surface water is proposed to discharge to this watercourse, via a SuDS network and then surface water pumping station, rather than to the watercourse and a combined sewer which is currently used.

EBNF is concerned at the potential risk of surface water flooding across the site and the reliance of a large SuDS basin, a pumping station and underground cellular storage tanks.

These measures are designed to mitigate the impact of the proposed development on surface water flooding. However the impact of overland flows from the surrounding fields continues to be of concern.

The fields to the north of the site have regular standing surface water during periods of high rainfall (see recent photos in Appendix 1). Indeed the current site has also contained standing water this winter (see photos in Appendix 1).

The potential of surface run off from the field to the North into the site is a concern. Will the level proposed along the Northern boundary be sufficient to prevent this?

4 ENVIREAU WATER FLOOD ZONE REVIEW REPORT

Envireau Water used a hydraulic numerical modeling study of the catchment area of streams and drains which are linked to the site. They predicted that Flood Zone should only cover the fields to the north of the site but does show that Flood Zone 2 would adjoin the site at its northern edge (see Figure 5 Numerical Modeling Fluvial Flood Plain). They predict a flood flow in a southerly direction towards the site.

They conclude that this modeling does not extend the fluvial flood zone into the site, surface water flooding will need to be considered as part of any planning application.

They also state that numeric modeling may need to be updated with a detailed ground survey of the study area, especially the fields to the north west of the site.

EBNF considers that although the Flood Zone map is to be altered by the Environment Agency, the site still has a significant flood risk. The medium risk zone will still adjoin the site and the high risk zone will remain very close to the site. As the Envireau Water report was completed in August 2020, has any detailed ground study been undertaken to support their modelling?

The report also states: ***As part of the development existing surface water flows that discharge to Northumbrian Water public sewer will be removed. This will reduce the loading on the public sewer during peak times and offer significant betterment.*** The photographs in Appendix 1 show standing water on the site on 20th November 2022. Also, it would seem that a significant area of the site already drains into the water course. These factors highlight the need to accurately assess the amount of surface water currently being discharged into the combined sewer before determining the true extent of any betterment. We request that the Local Authority verifies the claim made by the applicant concerning this.

The review of the consultant's report by Lead Local Flood Authority (LLFA), South Tyneside Council, is an onerous responsibility given the history of the site, the implications for the environment and the wellbeing of those who will live there. We trust that the proposals put forward and the supporting documents are robustly examined and the points made above given due consideration.

The above comments are to be read in conjunction with those set out in section 26 of our main response document.

**EBNF
20/12/22**

APPENDIX 1

A) STANDING WATER ON THE PROPOSED HOUSING SITE AT CLEADON LANE on 20 NOVEMBER 2022



B) FLOODING IN FIELDS TO THE NORTH TAKEN FROM THE BRIDLEWAY ON 16 DECEMBER 2022

