

FENLAND DISTRICT COUNCIL

LOCAL PLAN CORE STRATEGY PROPOSED SUBMISSION

This response is written on behalf of the Middle Level Commissioners (MLC) and our associated Internal Drainage Boards (IDBs) within the Fenland District Council area. The MLC are a flood risk management authority and a statutory navigation authority, while the IDBs are flood risk management authorities. The areas of the MLC and the IDBs are classed as defended flood plain and require a complex system of water management to reduce the risk of flooding. Even where the development itself may not be at flood risk, the nature of the geography means that risks may still be caused/created to other land and properties if proper and sufficient account is not taken of flood risk. The MLC and IDBs have also commented both in writing and in discussions with officers of Fenland District Council on previous drafts of this Strategy. We are pleased to note that many of our comments have been taken on board and included within the Strategy now out for consultation. The following comments of the MLC and IDBs are therefore made against this background.

1 It is noted that the Strategy proposes a Vision up to 2031. It is unclear to what extent any impacts of climate change will be noticeable at this time but it is believed that later plans will be better placed to take account of these. It is noted that the Vision does propose 11000 new houses to be built on the edge of the existing towns. Bearing in mind the flood risk presently to the District, the location of and method of drainage of these properties will require very careful planning and consideration.

2 It is disappointing to note that there is no reference to the MLC Strategy in 2.5.3. This Strategy forms the basis for the local arterial flood protection for the area.

3 Policies CS3 and CS11 refer to Doddington and Whittlesey WWTW. It should however not be assumed that MLC or the local IDB will permit any increase in the volumes/rates discharged to stream from these or other WWTW facilities.

4 It is unclear why March, Chatteris, Whittlesey etc are not also subject to flooding considerations. While much of the developed area of these settlements is comparatively high land, there are problems with surface water disposal even in these high areas, where surface water sewers are absent and soakaways are absent or poorly designed. The general concerns referred to in 1 above will also be present. As regards Wisbech, the town is also protected by local IDB infrastructure which must be taken into account as well as the risk from the Nene. The reference on page 45 to significant surface water attenuation being required is noted. This will need to be considered in the plans for the development of the area.

5 As the MLC/IDB systems are managed systems with a finite capacity, any improvements to the sewerage infrastructure will need to comply with MLC/IDB requirements.

6 On page 56, the position of the proposed rail freight interchange is noted. This appears to be located against one of the MLC's owned waterways and will need detailed discussion with MLC at the proper time.

7 On page 62 section 5.2 refers to managing the risk of flooding in Fenland. This section seems to set out the position in policy terms adequately. It is noted that the Policy also refers to the need to comply with byelaws.

8 On page 72 it is important to reflect the importance of development focussing on and enhancing the navigation and the navigable waterways where appropriate to do so.

9 Reference is also made to the Infrastructure Delivery Plan. This will need to be discussed with the MLC/IDBs and other utility providers and kept up to date to include developments in Partnership funding and other areas.

10 The MLC/IDBs support sustainable development but such development has to be truly sustainable and take full account of flood risk. We have noted examples in the past where development (not necessarily in this Council's area) has been claimed as sustainable but where inadequate consideration of flood risk has led to problems. We fully support the target that no Planning Permissions should be granted contrary to MLC/IDB advice but question why, in this area of high flood risk, the trigger point should be a HIGH level of departure from this Policy. The major proof of the Policy will still be judged on how planning decisions on individual applications will take properly into account the managed flood risk of the area? We note in this context that the Council have produced a District Wide Level 1 SFRA in 2011 but that many of its recommendations remain unimplemented and its contents appear not to be taken account of when individual planning applications are considered. The MLC/IDBs are also concerned about the number of planning applications still approved against our advice on flood risk grounds.

The MLC/IDBs look forward to discussing with the Council how the eventually adopted Strategy will be applied to planning applications.