

Cheltenham Flood and Drainage Panel (formerly Charlton Kings Flood Action Group): Representor ID 124 /submission 1360

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21 January 2019

Supplementary Written Statement for the Cheltenham Plan Hearings, in response to the Inspector's Matters, Issues and Questions, 5: Flood Risk

Representor ID (124/1360)

Overview

If the examination of the Cheltenham Plan is to meet the key requirements of legal compliance, safety, and operational soundness, then it needs to demonstrate:

- How it will fulfil its commitment to 'manage and reduce flood risk', showing clearly what its vision is, and where responsibilities for flooding matters lie, and identifying who is accountable at Cheltenham Borough Council (CBC) for planning, executing and reporting on this. We are mindful here of how intense rainfall events can result not only in river flooding, but also in surface water flooding resulting from overloading of the existing drainage system.
- How the Council will develop an integrated approach to discharge its legal and statutory responsibility, so ensuring that the Plan's principles, documentation, and practices relating to climate change and flood risk are genuinely shaped by a dialogue with residents, and draw on their input and local knowledge and experience. (Specifically in the case of surface water flooding where modelling can be complex, residents should be acknowledged as an important resource and source of data and consulted at an early stage.)
- How the Council will ensure that water catchment management and surface water flood risk and drainage is properly addressed in this plan and subsequent planning applications for new and brownfield development.

What follows are comments that are motivated by the desire to contribute in positive and workable ways to the Plan's ultimate

formation of a 21st century framework for dealing with surface water flooding and drainage issues and risk in Cheltenham.

Inspector's Matters, Issues and Questions: Matter 5, Flood Risk

The stated aim of the Council in the Cheltenham Plan consultation is to “**manage and reduce the risk of flooding within the Borough**” (Theme C objective g) and Flood Risk Management is a key part of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (Policy INF2). We applaud these key aims, but do not yet see them properly reflected in the Inspector's responses (which merely and overridingly ask whether the ‘proposals in theme C: when added to those in the JCS lead to any increase in flood risk’). We believe if CBC is to fulfil these aims in legally appropriate and meaningful ways, and to show an appropriate consciousness of the flood history and risk in Cheltenham, then it will need to amend the plan to incorporate a number of additional and crucial elements, showing several further things:

- ***How ‘flood risk’ is meaningfully assessed and measured, so as to quantify what a ‘reduction’ might and should be.*** Clearly, even the Inspector's lesser and vague notion of ‘no increase’ similarly requires the existing flows, rainfall, and runoff paths to be quantified and the establishing of ***systems and protocols of measuring and monitoring flood data that currently do not exist.***
- ***How the plan confirms, through a Council strategy statement, the adoption of a holistic approach to manage water catchment areas, reduce surface water flooding, and ensure proper drainage management.*** Such a strategy would further need:
 - to set specific objectives, measures, and actions so as to manage and reduce flood risk, and ensure active intervention and practical action.
 - to manifest and develop an enhanced understanding of flooding from surface water, from drainage systems, and from ‘non-main’ watercourses, through producing particular strategies for operation and investment. An important outcome of this will be the creation of safe ‘blue corridors’ that integrate these watercourses with main rivers, identifying flood-compatible spaces, and open up culverted watercourses. In other words, Cheltenham needs to make space for water and its related habitats.

- ***How and where responsibilities for flood issues and decisions are to be identified and allocated by CBC.*** In our view a minimal requirement is that there be permanent CBC post, or group, identified with this responsibility holistically to manage and deliver a real reduction in surface water flood risk and drainage system failure and demonstrate improvement over the plan period. This will avoid the currently amorphous and highly unsatisfactory situation where the buck can just be shifted between the LLFA, the EA, and the JCS:
 - We would expect to see in the plan clear ownership of this matter by a dedicated and fully funded resource(s) or function to be put in place at the Cheltenham Borough Council.
 - We would expect this function to review how effective and sustainable each flood defence or runoff mitigation measure is. It would be necessary to review maintenance operations to ensure they are proportionate to flood risk, and funded over their lifetime to prevent unacceptable public expense. Specific potential reviews include assessing increased and regular targeted debris-removal activities to reduce drainage blockages in and around Cheltenham.
 - We would expect Borough Councillors to receive proper training by independent experts so that they can comment in informed ways on flooding and drainage issues in planning meetings.

- ***How Cheltenham will seek to possess an adequate and updated Strategic Flood Risk Assessment.*** We note that the EA in comment 1277 on the Strategic Plan concluded that the ‘SFRA undertaken to date is akin to a desktop study rather than a qualitative assessment of all sources of flooding’, going on ‘to question the soundness of the plan and recommend the SFRA be updated and informed by a robust and detailed evidence base’. We feel even more strongly that the current plan (often involving inaccurate data) is totally unfit for purpose and must be replaced. We would favour a living document, informed and updated by actual data from the catchment, Government guidelines, best practice, and by local knowledge. Without such knowledge, it is not clear how planning decisions can be informed by a genuine and full awareness not only of what causes surface water and river flooding in key zones within Cheltenham, but also of the particular and increasing risks of surface water concentration “downstream” across the whole town’s drainage infrastructure. It follows:
 - The plan must have some clear and unambiguous statements of purpose and intent. We would expect to see the plan clearly state something along the following lines:

“Cheltenham Borough Council will always seek opportunities proactively to reduce the overall level of flood risk in the town

and beyond. It will also seek to maximise amenity, biodiversity and water quality benefits, as well as those opportunities and benefits that can be obtained from effective flood and water management.

As surface water flooding and the overloading of the drainage systems are principal risks and causes of flooding in the borough, the plan will state as an overarching principle, that at least all new and brownfield development should seek to provide an overall reduction in surface water flood risk from that established at the commencement of the plan.”

- ***How the plan will meaningfully factor in the issue of climate change.*** We note that the EA also noted in their comments that ‘the Local Plan does not include the impacts of climate change in line with the NPG’ (National Planning Guidance). ***Our own conviction is that Cheltenham should adopt a principle of quantifiable and qualitative betterment (beyond the minimum climate change add-on) for each and every new development identified in the supplementary plan.*** Our conviction here is that the following requirements and expectations are necessary components in the plan:
 - all and any developments that do not provide for an element of betterment over and above the minimum climate change factor should be documented and the reasons for not applying this policy must be clearly recorded.
 - where exceptions are granted, the developer makes a contribution to the newly created infrastructure fund of the borough so that it can help fund the improvement of drainage infrastructure, monitoring, and defences for the community over the lifetime of each development.
- ***How the plan might move beyond its current and inadequate identification of a flood strategy,*** following the EA, with a number of ‘at risk’ sites, as listed in the Inspector’s Matters, Issues and Questions (5:4). We note that Stroud for instance, has adopted and implemented measures reflective of a much more holistic and satisfactory vision, one based in successful catchment-based flood strategy and informed by community knowledge and participation with land-owners, in accordance with contemporary notions of flood management that are becoming increasingly adopted across the country. We strongly advocate such an approach for Cheltenham, though clearly again it would demand a step-change in the Council’s ways of gathering knowledge about the catchment, and giving consideration to the issue of flooding in both national and local contexts. It follows from this that:
 - We would expect the Council to set clear and unambiguous targets and measures that will outline what it intends to achieve and by when

in terms of flood reduction and drainage management activities, and how it will monitor these.

- ***How the Council will factor in its liabilities for managing the risks and consequences of its planning policy and decisions***, and ensure that developers take on appropriate long-term liability for the flood mitigation solutions that they engineer on sites. As it stands, the statement of common ground agreed between the EA and the CBC is still too vague and lacks any specific targets or details about how change will be brought about. So we propose the following:
 - Measures to include the development and application of robust new development control procedures, and the delivery of a local Supplementary Planning Guide, to support flood risk management and to enforce the use of correct modeling methodologies as recommended by the EA and best practice SuDs standards published by CIRIA.
 - The improvement of upland catchment management through new initiatives with land and asset owners to implement natural flood management schemes that control water run off to where it falls and mimic natural drainage as closely as possible, thus maximising water retention/ storage and slowing flows.
 - The development of a management protocol for future developments to produce no runoff from up to the first 5mm of any rainfall.

We hope that you will find these points to be helpful and constructive. It is clear that a huge amount of work, and a step-change in consciousness of flooding issues, are necessary if the Council is to deliver on this part of its strategy. Nonetheless, like you, we seek an outcome that will meet your criteria, resulting in a Plan that is positively prepared, justified, properly resourced, and effective and consistent with national policy. With this in mind, finally, we would in closing urge you to accelerate the drafting and adoption for Cheltenham supplementary planning guidelines such as exist in Tewkesbury and Stroud (and which we referred and linked to in our previous submission). Provided the Council ensures that the policies are robust and implemented fully, such a measure could at a stroke much better enable the planning process to give proper oversight and scrutiny to flooding issues, incrementally take pressure off our overloaded and aged drainage infrastructure and mitigate against a current unsafe situation that can often seem to be rather dismayingly asymmetrical and dysfunctional in favour of

developers, at the expense of town, councillors, and residents/ratepayers.

Yours sincerely,

Dr John Hughes (Chair)
Trevor Gander
Michael Wilson
Martin Langdon
Andy Thurlow