

South Gloucestershire Council

**Our ref:** NS/SGC/DC/3/36  
**Your ref:**

**Date:** 07 December 2011

### **South Gloucestershire Level 2 Strategic Flood Risk Assessment (SFRA).**

Thank you for providing a “final” version, dated November 2011, of the Level 2 SFRA to support your Council’s Core Strategy. This submission was received on the 30 November 2011.

The purpose of this letter is to act as a “letter of support” of your Level 2 SFRA so that it can be included as part of your submission for the forthcoming Examination in Public in 2012.

Overall, we believe the Level 2 SFRA provides an accurate representation of the flood risks of the River Frome, River Trym and Pickedmoor Brook catchments. In particular, the scope of the assessment is comprehensive, as it has undertaken an assessment of the proposed areas of search at a river catchment and site-specific boundary level. We are confident that the SFRA provides an effective flood risk strategy to inform strategic allocations and can be used to inform the Development Management decision-making process.

We would like to take this opportunity to summarise the key conclusions from the study:

1. The greatest risk to all of the above-mentioned river catchments is climate change.
2. To mitigate the increased surface water volumes, generated from new development, on site attenuation is required.
3. The catchment modelling assessment has indicated that when simulating an “un-attenuated and attenuated discharge” there appears to be no change in flood risk to Bristol City Centre. However, within the sub catchments in South Gloucestershire there is an increase in peak flows. As outlined in Chapters 9 and 10 these localised peaks will need to be investigated further through site specific FRA’s. This may result in additional on site attenuation being required within each development.

We are pleased that the study investigated a range of strategic infrastructure options across the River Frome catchment to determine if this could be a means for delivering new development and to provide a flood risk reduction to existing settlements. However, it’s disappointing that a preferred strategic solution was not forthcoming on the grounds of deliverability. Nevertheless, we understand the reasons for this decision and support your mitigation approach of on site attenuation to enable new development. We are pleased that you have included our comments in Chapter 9 and 10 seeking a flood risk reduction through new development’s on site attenuation proposals where feasible.

In addition, it's pleasing that this study has reinforced your "Flood Risk Topic Paper dated June 2011" by confirming that the development footprints, within your proposed areas of search, are located outside the floodplain (i.e. FZ1) for today and in the future when considering climate change. We support this sequential approach, which is in accordance with PPS25.

Once you have returned our hydraulic models, and we have received the SFRA GIS deliverables, it's our intention to use the SFRA flood maps for updating our flood map on our website. As we discussed recently, this will occur at the next quarterly update in 2012. Therefore, it's likely that there will be a period of time when our flood map is different to your SFRA flood maps.

It is essential that this study is used to influence core policies, forthcoming infrastructure plans and inform the Development Management decision-making process. We would welcome confirmation that the latest SFRA reports, flood maps and GIS data, once fully available, are being used to screen/validate incoming planning applications. This will avoid unnecessary consultation with the Environment Agency and provide guidance to prospective developers.

It's important that the report and supporting maps are kept up to date in light of any flood event, new modelling techniques, legislation or as a result of a developer led flood map challenges. We would be grateful if you would confirm who within your department will be managing flood map challenges, so that we know who to liaise with when required.

We would like to take this opportunity to thank you and your consultants for engaging with us and taking on board our recommendations throughout this project. We look forward to working with you on the delivery of your Core Strategy.

Please contact me on the number below if you wish to discuss any of the above further.

Yours sincerely

**Development and Flood Risk Engineer**