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Spatial Planning Manager
South Gloucestershire Council
The Council Offices
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Our ref: BS/NS/SGlosCSEiP
Your ref:
Date: 10 July 2012

Dear Mr Conroy

South Gloucestershire Core Strategy EiP - Avonmouth/Sevenside Level 2 SFRA.

We understand that it would be helpful to the EiP process for us to set out our support for the work you have done through the Level 2 SFRA on Sevenside/Avonmouth.

Further to the telephone conversation between Liz Allison (SGC) and Nigel Smith (EA) in respect of the above we are pleased to provide this letter in support of the Level 2 SFRA for Avonmouth/Sevenside (dated February and March 2011). It has been some time since we last discussed this project post completion. The reason we did not issue a "letter of support" sooner is due to the outstanding data issues with the final flood zones. You have made us aware that this matter has now been resolved internally between the councils (SGC and BCC). I would be grateful if you could forward this information as soon as possible so that this matter can be completed.

Overall, the Sevenside/Avonmouth Level 2 SFRA is a welcomed update to the previous PPG25 version and now provides a more accurate representation of the flood risks for the area.

The Level 2 work highlights areas where we will need to continue to work closely together in addressing flood risks in this part of South Gloucestershire (and Bristol City).

- 1) As we are all aware the tidal flood risks at Avonmouth/Sevenside are significant. The level of protection offered by the current defences will reduce significantly in the future due to the effects of climate change. If defences are not improved the frequency and severity of flooding in the future will increase. In light of this concern we are pleased that there is a strong recommendation that a strategic approach, through new flood defences, is recommended as the most effective means of protecting both existing and new development
- 2) Improving the existing flood defences may be the preferred option from a flood risk perspective but is unlikely to be immediately forthcoming due to the environmental impacts on the Severn Estuary European designations. In addition, deliverability is also questionable when considering the high financial costs for improving such an extensive length of coastal defence. As you know our Severn Estuary Flood Risk

Management Strategy is still in a draft format but it's unlikely that we would achieve significant funding from central government due to the low existing residential numbers in this area. Therefore other sources would need to be explored and utilised if both LPA's (SGC and BCC) wish to deliver their long term objectives for Avonmouth/Sevenside.

- 3) Strategic land raising results in an increased flood risk to third parties. Table A8.2.3 (page 8-1) shows that a complete build out of Dyers Common and Crooks Marsh (ICI and Waste sites) results in an increased flood depth of 300mm to 2m due to the significant losses in tidal floodplain storage. We acknowledge that the Sevenside 1957 planning consent presents challenges in delivering a co-ordinated strategic solution. Nevertheless, flood risk needs to be a fundamental consideration in delivering growth here.
- 4) As we stated at Bristol CC Examination of their Core Strategy we have concerns that there is no flood risk strategy for informing planning applications. At present planning applications are solely mitigated on a site-by-site basis through localised land raising. We are concerned that the cumulative impact of this approach will reduce available flood storage in an overtopping event resulting in an increased flood risk to third parties (see 3 above).
- 5) Within the mitigation section the study considers stilts and voids as a suitable means to enable development in this flood risk area. As we have already stated through the consultation stages we would not support this option at the planning application stage. We still consider that the use of stilts/voids should not be recommended as a strategic or site specific solution to enable new development. From a flood risk perspective its commonly seen as means to avoid floodplain compensation and keep flood flow routes free. This doesn't actually happen as the voids become filled or used as storage areas in the long term thus rendering it a "solid" area. In addition, it would be a difficult task for the LPA to enforce the void areas.
- 6) Its unfortunate that the background calculations for the breach and flood defence condition assessments have been misplaced. These will be needed to support the outputs. In the meantime we would suggest that the outputs are considered as "indicative" and only provide an indication of the actual risks. Therefore the risks could be higher, or lower, than stated in these sections.

Next Steps

As both Councils are still finalising their respective LDF portfolios it is essential that this study is used to influence core policies, forthcoming infrastructure plans and applied within everyday Development Control planning work.

It is also important that the latest SFRA reports, planning matrix, maps and GIS data are being used to screen/validate incoming planning applications. This would enable quicker consideration of applications and avoid unnecessary consultation.

The Environment Agency

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We look forward to working with you on this area in the future. Please contact me on the number below if you wish to discuss the above further.

Yours sincerely

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