

Central Lincolnshire Policy S21 Flood Risk and Water Resources Evidence Report

Formerly Policy S20

March 2022



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1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S20, which relates to managing flood risk and water resources.

2. Policy Context

National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019 and a further update in July 2021.
- 2.2. The need to take flood risk and water management into consideration is referenced throughout the NPPF. It refers to the need to plan for flood risk and coastal change, water supply, wastewater and water quality and climate change.
- 2.3. Paragraph 20b) requires strategic policies to make sufficient provision for water supply, wastewater, flood risk and coastal change management, while the whole of Section 14 is concerned with meeting the challenge of climate change, flooding and coastal change with the following points of particular relevance:
 - Paragraph 152 states that the “planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change” and “minimise vulnerability and improve resilience; encourage the reuse of existing resources...”
 - Paragraphs 159 to 169 covers “planning and flood risk”, stating that “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.” It states that strategic policies should be informed by a strategic flood risk assessment, managing risk from all sources and should be aware of cumulative impacts. It also provides details and application of the sequential, risk-based approach to the location of development and of the application of the exception test, if necessary.
- 2.4. Section 15 concerns “Conserving and enhancing the natural environment” and the following is of particular relevance:

Paragraph 174 requires planning policies and decisions to “contribute to and enhance the natural and local environment by:”... ensuring that development “should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans”.
- 2.5. The Planning Practice Guidance (PPG) was first introduced in 2014 which offers ‘live’ government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.

- 2.6. It contains a section on “climate change” which advises on the statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. It advises on considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development and considering the availability of water and water infrastructure for the lifetime of the development.
- 2.7. It also contains a section on “flood risk and coastal change” which includes further information on the consideration of flood risk and the precautionary approach, which flood risk management bodies should be consulted in the preparation of the Local Plan, the preparation of Strategic Flood Risk Assessments, information on sustainable drainage systems and making development safe from flood risk.
- 2.8. The section on “Housing: optional technical standards” allows higher water efficiency standards to be introduced where there is a local need and the section on “water supply, wastewater and water quality” advises on how planning can ensure water quality and the delivery of adequate water and waste water infrastructure.

Local Policy

- 2.9. The adopted Local Plan includes policy LP14: Managing Water Resources and Flood Risk which sets out the Central Lincolnshire approach to managing flood risk and protecting the water environment.

3. Context and Evidence

- 3.1. Central Lincolnshire contains significant areas of low-lying land for which a number of organisations are responsible for managing flood risk and drainage, including the Environment Agency (EA), Lincolnshire County Council as Lead Local Flood Authority (LLFA), Anglian Water and Severn Trent Water Companies, the Canal and River Trust, a number of Internal Drainage Boards (IDBs) and the three Local Authorities. Flood defences protect many of the existing built-up areas from river flooding to a currently acceptable standard, but it is anticipated that the risk of flooding will increase in the future as a result of climate change. These include predicted sea level rise, more intense rainfall and increased river flows.
- 3.2. Many of Central Lincolnshire’s settlements were originally established adjacent to rivers or other water bodies. Over time these same settlements have grown into the main centres of population in Central Lincolnshire and now represent, in terms of wider sustainability criteria, the most sustainable locations for future development. A careful balance therefore needs to be struck between further growth in these areas to ensure their communities continue to thrive and the risk of flooding.
- 3.3. With the increased likelihood of more intense rainfall combined with further development in Central Lincolnshire, there will be an increase in the incidence of surface water runoff, placing greater pressure on existing drainage infrastructure. The discharge of surface water to combined sewer systems should be on an exceptional basis only. This will ensure that capacity constraints of existing systems are not put under severe pressure by placing unnecessary demands on existing sewage works and sewage systems which in turn could compromise the requirements of the Water Framework Directive. The discharge of surface water to combined sewer systems can also contribute to surface water flooding elsewhere.

- 3.4. Sustainable Drainage Systems (SuDS) are used to replicate, as closely as possible, the natural drainage from a site before development takes place without transferring pollution to groundwater. Developers should ensure that good SuDS principles consistent with national standards such as The SuDS Manual (C753 – CIRIA) are considered and incorporated into schemes as early in the development process as possible. A multi-functional approach to SuDS is encouraged that should take every opportunity to incorporate features that enhance and maintain biodiversity as part of a coherent green and blue infrastructure approach. The use of Integrated Water Management is encouraged for larger scale developments. Reference should be made to the Lincolnshire County Council Development Roads and Sustainable Drainage Design Guide and CIRIA guidance on Integrated Water Management. The Design Guide provides information on planning and adoption milestones and requirements and lists the essential technical documents and information required at various stages of the planning and adoption process to enable the necessary processes to be progressed. When SuDS features which meet the legal definition of sewers are to be adopted by the relevant water company for the area, reference should be made to the Design and Construction Guidance.
- 3.5. The Central Lincolnshire authorities work closely with water companies, the EA and other relevant bodies to ensure that infrastructure improvements to manage increased waste water and sewage effluent produced by new development are delivered in a timely manner, and to ensure that, as required by the Water Framework Directive, there is no deterioration to water quality and the environment.
- 3.6. Groundwater Source Protection Zones (SPZs) are areas of groundwater where there is a particular sensitivity to pollution risks due to the closeness of a drinking water source and how the groundwater flows. They are used to protect abstractions used for public water supply and other forms of distribution to the public such as breweries and food production plants. Development in the SPZs will be expected to comply with the EA's guidance document, 'Groundwater Protection: Principles and Practice (GP3)' or any subsequent replacement.
- 3.7. Parts of Central Lincolnshire are currently constrained by the capacity of water recycling infrastructure and will require coordinated timing between development and new or improved infrastructure provision. The predominantly rural nature of the area means that there are developments without mains drainage connection that will require careful design and management. The first presumption in such areas must be to provide a system of foul drainage discharging into a public sewer. Only where it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.
- 3.8. Groundwater Source Protection Zones (SPZs) are areas of groundwater where there is a particular sensitivity to pollution risks due to the closeness of a drinking water source and how the groundwater flows. They are used to protect abstractions used for public water supply and other forms of distribution to the public such as breweries and food production plants. Development in the SPZs will be expected to comply with the EA's approach to groundwater protection (Feb 2018 v1.2) guidance document, 'Groundwater Protection: Principles and Practice (GP3)' or any subsequent replacement.
- 3.9. Central Lincolnshire lies within the East Midlands area of serious water stress where drought is a cause for concern. This is a major challenge in the context of Central Lincolnshire's planned growth and will require careful conservation and management of water resources to ensure that demand for water can be achieved in a sustainable manner. It also provides the justification to require, via this Local Plan, the higher water

efficiency standard of 110 litres per day which can be achieved through the installation of water efficient toilets, showers and taps. Water re-use measures are encouraged wherever feasible in order to reduce consumption and demand on the mains water supply further. This is covered in greater detail under Policy S12: Water Efficiency and Sustainable Water Management.

- 3.10. The River Trent as it skirts the edge of Central Lincolnshire and runs adjacent to the main town of Gainsborough, from Cromwell Weir to the River Humber, is tidal and flows into the internationally important Humber Estuary. The River Witham passing through Central Lincolnshire and the City of Lincoln flows into the Wash, also of international importance. As such, any proposals that affect or might affect the marine area should make reference to and be guided by the Marine Policy Statement and supporting guidance or any subsequent replacement. The Marine Policy Statement provides a shared UK vision for clean, healthy, safe, productive and biologically diverse oceans and seas by ensuring a consistent approach to marine planning across UK waters. Development in this area should also make reference to the East Inshore and East Offshore Marine Plans.
- 3.11. To support the planning process and provide a better understanding of flood risk, drainage management and water management in the area, data from the EA, LLFA, IDBs and Water Resources East have been used to inform the SFRA Level 1 and 2, site allocations and Local Plan policies. In preparing the Local Plan, the Joint Lincolnshire Flood Risk and Drainage Management Strategy, Partnership Approach to Catchment Management, Water Resources Management Plan and the GLLEP Water Management Plan have been referenced.

4. Issues and Options Consultation

- 4.1. The Issues and Options consultation identified the existing policy, LP14: Managing Water Resources and Flood Risk as a policy not intended to be changed. The majority of respondents supported the policies that were identified as not intended to be changed although some expressed the view that all should be reviewed in light of climate change. For this particular policy there were some expressions of support and some comments including the need to update the policy and strengthen certain elements of it.

5. Regulation 18 Consultation

- 5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.2. A number of comments were received in relation to this policy summarised as follows:
- Several comments were received either supporting or broadly supporting the policy;
 - Some support was expressed for the policy subject to criteria being met and enforced;
 - Some comments were received suggesting that the policy wording was not strong enough and others that it was too strong and required too much;
 - Various detailed suggestions were made to improve clarity of policy and supporting text wording;
 - And a suggestion that the evidence behind the policy requires further work.

6. Proposed Approach in Draft Local Plan

- 6.1. The Draft Local Plan includes a policy outlining the approach to flood risk, water resources and protecting the water environment. The policy has largely been carried forward from the adopted Local Plan with references brought up to date and elements strengthened. This includes the introduction of a new policy, S12: Water Efficiency and Sustainable Water Management which strengthens the surface water and water efficiency/ reuse elements.

7. Reasonable Alternative Options

- 7.1. The following alternative option has been considered for this policy (option 1 being the preferred option).
- 7.2. Option 2: to have no local policy and rely on national policy. This option was discounted because, although national policy and supporting guidance provides extensive general advice, it is not felt that it provides adequate local guidance and support for Central Lincolnshire. The preferred option expands on national policy and guidance by seeking to address locally specific issues such as applying the optional increased water efficiency to reflect the fact that Central Lincolnshire is located in a higher water stress area of the country.

8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.