

Beccy Dunn
Project Manager
Water Engineering and Management
Halcrow Group Limited
Lyndon House
62 Hagley Road
Edgbaston
Birmingham
B16 8PE

Our ref: Lydney Level 2 SFRA

Your ref:

Date: 2 September 2009

Dear Beccy

Lydney Level 2 Strategic Flood Risk Assessment (SFRA) – Environment Agency confirmation letter

Thank you for sending the Lydney Level 2 SFRA for our comments. This letter confirms our acceptance of the document and highlights key matters for the Council so I am copying it to Nigel Gibbons at the Forest of Dean District Council.

We have reviewed the document and maps. We had some initial comments which we have discussed with you and you have clarified the matters we raised. We are therefore satisfied with the document, both from the mapping/technical perspective, and the written report/policy recommendations perspective. We can therefore confirm we consider the document a sound basis on which the Forest of Dean District Council can base its Local Development Framework (LDF), in particular the Core Strategy.

The modelling you have undertaken of the Plummer's Brook indicates that there is no fluvial flood risk posed to the potential development sites identified by the Council up to and including the 1000 year event. This confirms that all the sites are in Flood Zone 1.

However, we take this opportunity to highlight two matters to the Council:

Firstly, we note that section 6.2 of the document recommends that the **two potential allocations near Naas Lane and the A48 will need assessments of the rail embankments and their potential to hold back flood waters**. It has been advised that this is investigated in detailed Flood Risk Assessments (FRAs) of the sites at pre-planning/application stage. However we recommend that the Council investigates this issue now at the pre-development plan stage, by contacting Network Rail and the Highways Authority/County Highways Department. This is to make sure there are no 'show-stoppers' for these allocations. (For example there may be

development proposed by Network Rail for instance, that could alter the flood risk situation in this area and thereby call into question the soundness of allocating the sites.) It would still be necessary for developers to undertake detailed FRAs for the sites and investigate the embankments. However we advise the Council take a precautionary approach to this matter and contact Network Rail/Highways at this stage.

Secondly, one of our initial queries on the document was in relation to surface water and run-off rates in the policy advice within the document. From our discussions we understand that the assessment indicates that, **due to the existing flooding problems in the area near Lakeside Avenue, reductions on current surface water run-off rates will need to be achieved through development proposals.** This is needed to address and help reduce the existing flooding problems. We welcome this approach and **recommend that the Council takes a strong policy stance on this in their Core Strategy.**

We have previously advised the Council on the need to address the existing flooding problems in this location through the planning process, at both the Local Plan stage and in individual development proposals. Furthermore, the Secretary of State endorsed the approach of managing residual risk and delivering betterment in her decision on the 'Lydney A' appeal. We therefore consider the Level 2 SFRA adds significant weight to the already existing case to take forward a strong policy stance in the LDF for addressing existing flooding problems, managing residual risk and delivering betterment. We look forward to working with the Council to assist in securing this approach in the LDF/Core Strategy.

Yours sincerely,

Ruth Clare
Planning Technical Specialist

Direct dial 01684 864383

Direct fax 01684 293599

Direct e-mail ruth.clare@environment-agency.gov.uk

Cc Nigel Gibbons - Forest of Dean District Council