

Caroline Llewellyn

From: Sarah Hirst
Sent: 01 July 2019 15:08
To: Caroline Llewellyn
Subject: FW: Local Development Plan 2 Examination

Hi Caroline – please see the response from Louise Edwards below, as requested by the Inspector.

Sarah

Sarah Hirst
Planning Officer (Park Direction) / *Swyddog Cynllunio (Cyfeiriad y Parc)*

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From: Edwards, Louise
Sent: 01 July 2019 15:06
To: Sarah Hirst
Subject: RE: Local Development Plan 2 Examination

Hi Sarah

In response to your email, please find my comments set out below.

The purpose of the SFCA is to help Local Planning Authorities (LPA) take flood risk into account when considering future land allocations and appropriate development control policies. Where an LPA is unable to direct new development away from areas at high risk of flooding, it will help them focus their efforts on the most appropriate sites. It can also be a useful source of information for developers when producing a site-specific flood consequence assessment.

Section 10.6 of Technical Advice Note 15: Development and Flood Risk (TAN15) states that.

“Where the local planning authority wishes to allocate a site, and can justify such an allocation, the local planning authority will need to undertake a broad level assessment of the consequences of flooding occurring on that site, in consultation with the Environment Agency. This assessment should demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way. Where such local information has been produced then this should be reflected in the plan.”

However, Pembrokeshire Coast National Park Authority have not allocated or brought forward any candidate sites within Flood Zone C of the Development Advice Maps and therefore a Strategic Flood Consequences Assessment (SFCA) is not required.

When considering new development proposals TAN15 states that it is necessary to take account of the potential impact of climate change over the lifetime of development. <https://gov.wales/sites/default/files/publications/2018-11/planning-policy-flood-risk-and-insurance-changes.pdf> Residential development is assumed to have a lifetime of

100 years while a lifetime of 75 years is assumed for non-residential developments. To ensure future development can provide a safe and secure living and /or working environment throughout its lifetime, national planning policy requires proposals in areas of high flood risk to be accompanied by an assessment of flooding consequences to and from the development, taking into account the impacts of climate change.

The Local Planning Authority have considered climate change by taking account of TAN 15 and the Shoreline Management Plan (2's) and as a result have produced policies 33 – 38 which Natural Resources Wales have formally supported.

Regards
Louise

Louise Edwards
Uwch Ymgynghorydd Cynllunio Datblygu/ Senior Development Planning Advisor Cyfoeth Naturiol Cymru / Natural Resources Wales

www.cyfoethnaturiol.cymru / www.naturalresources.wales

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Correspondence in Welsh is welcomed and we will respond in Welsh without it leading to delay

From: Sarah Hirst
Sent: 27 June 2019 11:43
To: Edwards, Louise
Subject: Local Development Plan 2 Examination

Dear Louise, the Inspector conducting the Examination of our LDP has detailed a number of questions for each of the Examination sessions. One of the questions asked if whether a Strategic Flood Consequences Assessment has been undertaken. I recall that in early meetings with you and your colleagues about the LDP Revision, as none of the sites allocated for development are in flood zones, you advised that you would not require a SFCA. Through subsequent consultations on the Preferred Strategy, Deposit Plan and Focussed Changes you have not raised any objections to the development sites nor the need for a SFCA. For the sake of clarity, I would be grateful if you would confirm this in writing, as a response to this email. This will then be forwarded to the Inspector and put into the Inspection Library.

Kind regards
Sarah

Sarah Hirst
Planning Officer (Park Direction) / *Swyddog Cynllunio (Cyfeiriad y Parc)*

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