

**Sustainable Growth
Executive Director Mark Doran**



**Planning Policy
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Dear Mr. Briggs,

Re: St Albans Local Plan Additional Documents Consultation

Thank you for consulting HCC on the additional documents.

The Local Lead Flood Authority has concerns that the Flood Risk Assessment Addendum has not been updated to be in line with the current NPPF and PPG. The approach of using 20% surface water flood risk to site would not meet with the new requirements to ensure that development, including access to the development, will not be at flood risk and be safe for its lifetime. Whilst the sites assessed may be correctly assessed in depth, this approach for windfall sites will allow developers to come forward with flood risks, either in a flow path or access entirely cut off, instead of considering how development can be located in the areas of low risk.

Therefore, we consider that:

- the text on the role of surface water does not accord with the approach to the sequential test in the updated PPG. The Local Plan documents must be amended as surface water flood risk is part of the sequential test and must be considered.
- a blanket approach that surface water should not be considered in the sequential test or that sites with a certain percentage of risk should not be considered, ignores the risk of existing flow pathways from offsite and will put housing and people at risk of flooding.
- the focus should be changed. Where a site has identified surface water risk, the developer can propose ways to develop the safe parts of the site (including access) demonstrating avoidance of the high flood risk areas. This should not be about the percentage of risk overall but sequentially approaching each site.

You will be aware that Hertfordshire Ecology have already provided feedback, under separate cover as part of their *Service Level Agreement* that is in place with St Albans City & District Council.

I can confirm that HCC does not have any comment to make on the following evidence documents:

- Transport Modelling
- Green Belt Previously Developed Land
- Site Sifting
- Gypsies, Travellers and Travelling Show People

We welcome the opportunity to discuss HCC comments to any part of the Local Plan process as considered appropriate.

Yours sincerely

Charlie Thompson MRTPI
Senior Planning Officer
Hertfordshire County Council