



CANVEY GREENBELT CAMPAIGN

Submission on the PPS25: Development and Flood Risk Sequential Test and Exception Test Update

To be to be read alongside the document.

Core Strategy PPS 25 Sequential and Exception Test Final September 2009

The September 2010 update's intention is to consider only housing when endeavouring to ensure that the Core Strategy remains sequentially appropriate with its identified housing distributions.

In order to satisfy PPS25 sequential test the Planning Authority will need the support of an informed Strategic Flood Risk Assessment to demonstrate that there is no reasonably available sites in areas of the borough with less risk of a flooding, that would be appropriate to the type of development or land use proposed.

The September 2010 update identifies that there is a requirement for a sequential approach to be taken to locations considered for development. This approach endeavours to be site specific when relating to locations. The Core strategy constantly compares Canvey Island in isolation with the remainder of the borough and it is essential to do so when considering flood risk. The whole of Canvey Island is in a Zone 3a flood risk. The Environment Agency will have to agree to the remodelling approach of a SFRA findings which has now identified that all of the proposed housing development areas on Canvey Island, using the most efficient means of producing flood risk modelling, are shown to be much more onerous to residual flood risk than previously identified in the 2006 SFRA produced by Scott Wilson for evidence in support of the Core Strategy produced by Castle Point Borough Council

The September 2010 document notes that dwelling houses are considered to be of a more vulnerable use category. Even greater cause for concern, particularly for emergency planners and emergency service response must be those residential dwellings such as single storey dwellings and caravans. The TE 2100 Canvey Island Action Plan mentions that vulnerable developments such as above should have escape or community refuge plans, it goes on to suggest that if this is not possible, they should be replaced by other types of building use that have living accommodation above flood level.

This implies that any new development, to achieve a profit, reach affordable housing targets, and release developer contributions may well have to be of three or more storeys, or flats. Given Castle Point Borough Council's preferred siting and regulations towards flats, as stated in the Adopted Local Plan:- ***"THE SCALE, SITING AND DESIGN OF THE PROPOSED BUILDING SHOULD NOT HAVE AN ADVERSE EFFECT UPON THE CHARACTER OR APPEARANCE OF THE AREA; THE DEVELOPMENT SHALL BE LOCATED ON OR NEAR A MAIN ROAD SITE."*** Consideration needs to be given to how these conditions would agreeably be met.

It is difficult to therefore see how justification can be given for the exceptional circumstances to permit housing development on the Zone 3a flood plain of Canvey Island. The assumption that a special case can be made by suggesting that housing-

need is the primary answer to resolving deprivation on Canvey Island and that by adding more to its over urbanised environment is the answer. It is incomprehensible to infer that lower paid jobs will cure social needs. It is clearly evident that more suitable options are available on the Mainland part of the Borough and could be provided, given the same determination as shown towards the flawed Canvey Plan.

To refer to the flood risk as such:- ***“The level of hazard across the island varies with the hazard being greatest near the sea defences, and near Canvey Lake and other dykes and ditches.”*** is misleading. The sites identified will have an affect, in the event of a flood, on neighbouring estates. The Dutch Village Estate has un-adopted roads and lack drainage. We provided in our previous evidence submission, photographs of flooding on this estate, typical of heavy rainfall events. The drain along the southern side of the East of Canvey Road site is a red zone and may also cause flooding to the St. Michaels estate.

The Strategic Flood Risk assessment will be required to support the Council’s Core Strategy. The Final revised SFRA documents were produced and made available on the 2nd of December 2010 these documents will be the subject of a further submission from our group following our scrutiny in the early part of 2011.

We still await a Water Cycle Study and Surface Management Plan. These studies are an essential part of the council’s justification approach. All new developments must demonstrate that all measures have been undertaken to manage water run off. It is essential that existing developments are not compromised by ground water displacement. It is difficult to gain an understanding of how this is remotely possible when proposing development on Green Belt Land that provide a flood plain water take up provision.

The Final September 2009 document declares that The Draft Thames Estuary 2100 plan proposal is the continued maintenance of flood defences around the urban areas of the Island to ensure the safety of the community up to 2100 and beyond.

The Thames Estuary 2100 plan TE2100 action plan action zone 7, however only states when discussing (The existing Flood Risk Management System) that ***“Maintenance and improvements of the system of large defences is well justified”***

The ***“vision”*** of policy unit 4 is to make Canvey Island a safer place ***“the defence system will be maintained and improved but in parallel with this it is recommended that the introduction of community strategies for safe havens.”***

6.3.3 Scott Wilson’s SFRA also refers to Policy P4 which recommends that ***“further action is taken to sustain the current level of flood risk into the future (responding to the increases in risk from urban development, land use and climate change)”*** It is proposed that existing defences are maintained around Canvey Island to ensure the safety of the community to 2100 and beyond.

The Environment Agency written response 10th November 2010 to the question from the Canvey Green Belt Campaign group asking “Is the maintenance of Canvey Sea defences guaranteed for the next 100 years” was as follows:- ***“You mention a commitment from us to maintain Canvey Island tidal defences for the next 100 years. This is not strictly correct. The Thames Estuary 2100 (TE2100) strategy has set out our recommended policy for the coming years as taking action to maintain the level of flood risk into the future. This will require us to do more in the future to counter the impacts of climate change. However, whilst this is our preferred policy for the Island, we cannot absolutely commit to achieving this because we will always be dependant upon the availability of funding. That stated, the strategy will provide us with the evidence to make a justified and robust case to secure future funding.”*** 3.2.3 Of Scott Wilson’s SFRA documents state: - ***“The Environment Agency is under no obligation to provide a statutory/minimum level of flood defence and with the existing climate change, the defence of Canvey will decrease in standard (due to the anticipated rise in sea level)”***

The above identifies that there is lack of security for the long term funding provisions for the continued maintenance and improvements of the Canvey Island sea defences (clearly identified as a necessity) over the planned period of the next 100 years. This aspect may have been mistakenly misrepresented, by Castle Point Council Planning Officer, when informing councillors that funding is guaranteed; this pronouncement gave the argument that the long term future of the Island Sea defences is undoubtedly secured, this is not the case.

The Final September document states:- ***“In addition to proposals regarding flood defences, there are also proposals set out in Thames Estuary 2100 to create new tidal habitats to replace those lost as a result of coastal squeeze. A proposed location for this is at West Canvey Marshes where freshwater habitats are currently being created. In order to achieve this, the defences would need to be realigned further inland, seeing the currently defended marshlands inundated at high tide. This has implications for the tide flood models proposed as part of the SFRA, and will therefore need to be factored into revised models when produced.”*** This adds a major issue when seeking to establish flood depths and velocity flows caused through residual flood risk within the defended flood plain of Canvey Island and although referred to at 6.3.5 and 6.3.6 in the SFRA, estimations have not been included in the updated SFRA breach modelling produced for Castle Point Council. This is a significant omission that may cause the SFRA document to be considered fundamentally flawed on the grounds of sustainability not having been fully explored and evidenced. It is appreciated that it is difficult to predetermine an actual realignment strategy, however the minimum content one might have expected is a reference to identify through estimations, on the same lines of the breach analysis conclusions, to show what the possible outcomes could be. It is not unrealistic to assume that the Environment Agency have some proposed options for the Canvey Sea defence realignment project when considering the work undertaken through the public

consultation process in support of the TE 2100 options for flood water management and coastal habitat.

Recognising the significance of the inclusion of the sea defence realignment in the Final PPS25 Development and Flood Risk September 2009 document, the council's amendment in the update document states ***“that this proposal does not affect Castle Point until the third epoch of the plan i.e. beyond 2070, and is not therefore possible to model the implication of this at this stage.”*** This we do not consider to be a responsible and sound approach from a Local Planning Authority seeking to secure the long-term safety of its community against a catastrophic possibility.

The Sequential Test approach has been carried out in both 2009 and 2010 documents before new information on the potential risks and hazards from tidal sources highlighted in the Scott Wilson SFRA 2010 document has been finally released. Given the existing levels of flood risk and the perceived development pressure facing Canvey Island more detailed flood risk information for areas at medium or high risk have been provided by Scott Wilson, the Borough Council's consultants. Hydrodynamic breach modelling has been undertaken at eight locations around the tidal frontage to provide more detail on the nature of Residual Tidal Risk, in addition to Actual Flood Risk.

Residual risk:- The risk that remains after all risk avoidance, reduction and mitigation measures have been implemented. Results from breach modelling demonstrates that the vast majority of Canvey Island is at residual risk of flooding following a breach at any point in the defences during extreme water level scenario, flood water will naturally flow to low points including drainage channels and infrastructure.

Actual Flood Risk:- Describes the risk posed to development within the defended area where the standard of protection offered by the existing defences is below the statutory level. Hydrodynamic modelling undertaken as part of the SFRA process shows that part of Canvey Island is at actual risk of flooding during the 1 in 200 year flood plus climate change to 2110. The actual risk is vastly increased when considering the 1 in 1000 year event plus climate change.

The Castle Point Borough Council's Update document to PPS25 September 2010 when considering site specific Flood Risk Zones and Flood Risk hazards for the **East of Canvey Road** site shows in table 1 page 5 of 17 that this site's flood risk zone is defended from flooding by defences that offer 1 in 1000 year level of protection. ***“With a Flood Risk Hazard as being mainly a low hazard zone (Green) the area closest to the dyke having a far higher hazard (Red). In the event of a flood the hazard to people on the site would be low provided that the development is away from the dyke.”***

Work undertaken by Scott Wilson now shows an assessment based on modelled results for the 1 in 1000 year extreme tide level including an allowance of 100 years climate change to 2110 that this site's vulnerability as More Vulnerable equating to the

requirement of an Exception Test. Where an Exception test is required, the flood risk assessment needs to provide the necessary evidence to support part C of the test.

Safe Access Egress has now been identified as being an issue for this site, with the indication that inundation could be to a depth between 0.5m and 2m. The approach to be taken to access/egress varies depending on where the breach location is, three of the breach locations identified by the modelling assessment lead to water reaching this site in “*less than 1 hour*” making the warning of a breach challenging which would probably not provide sufficient time for evacuation (the same issue is now shown to be compromising the whole of Canvey Island)

A flood risk assessment is required to demonstrate that development in this area will be safe, without increasing flood risk elsewhere and where possible reducing flood risk overall, this is an impossibility given the evidence provided by the revised flood risk modelling.

The entire development sites proposed for Canvey Island Green Belt flood plain within the Core Strategy and the forthcoming Canvey Plan should now be re-assessed in view of the findings of the Scott Wilson SFRA and the same rigorous Exception Tests applied. It is for the council to justify whether the need justifies the risk and reassess the sustainability issues of individual proposals. The Council have now to demonstrate that additional risk has been appropriately re-assessed to take into account the hazard presented to the occupants of the sites, surrounding population and property from flood inundation depths and water flow velocity.

Flood Hazard:- with regard to East of Canvey Road when referring to the fig.C-4 in Scott Wilson’s draft document October 2010 it can be seen that the site is located within an area of significant hazard (as defined by FD 2320 DEFRA and Environment Agency 2005). Pockets of extreme hazard are located around the perimeter of the site associated with local drainage channels.

The Council has to date not provided evidence that it can confidently provide a robust emergency flood response strategy for this site, or indeed the whole of Canvey Island, which would be cut off from the mainland for some considerable time during extreme flood conditions.

The residents of Canvey Island urgently need to be engaged in flood risk awareness programmes appropriate to the new levels of residual risk identified by the up dated flood modelling statistics.

The Green Belt comments in the Tables when referring to West of Canvey Road frontage, East of Canvey Road and Castle View School generally sum up as “*the functions of the Green Belt in this locations are therefore weak and provide benefits only at the very local level in terms of views for neighbouring landowners. This area of green belt does not fulfil a strategic function.*”

This is totally inconsistent with the Castle Point Council Green Belt Functions Report of September 2010 which states typically of these areas:- ***“The parcel checks the unrestricted sprawl of West Canvey. As with parcel 24, the parcel is highly susceptible to encroachment”***, and ***“This does not detract from the openness and character of the countryside however as it is only a small level of encroachment, the parcel successfully safeguards the countryside from encroachment.”***

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. The five purposes of including land in the Green Belt are set out in paragraph 1.5 of PPG2 and include the safeguarding of the countryside from encroachment.

The whole East of Canvey Road development would be of a scale and visibility that would fail to preserve the openness of the Green Belt and would encroach upon the very edge of the countryside, thereby conflicting with one of the purposes of including land within the Green Belt. Its effect on the openness of the Green Belt and on the character and appearance of the area will be noticeable. The impact of the development must be assessed against its present condition of open, semi-natural land on the very edge of the greenbelt where open land abuts built, urban, developed areas, edges clearly defined by drain, ditches, dykes and hedgerow. This is the proposed site's essential characteristic - its open, flat, historic undeveloped nature that would be completely altered.

“The SHLAA identifies capacity to deliver 989 units on previously developed land within the urban area of Canvey. Given that there is an over supply of previously developed land sites on Canvey Island in comparison to the supply required to meet the target for housing on previously developed land of 60%, it is necessary to consider whether the excess capacity of 340 units can be delivered in a sequentially preferable location elsewhere.” The 60% target is just that a target, not an upper limit. The target should not be used as an excuse to justify allocating Green Belt land. Green Belt land should be used as a last resort, so as not to delay the release of previously developed land. To identify 340 excess capacity units and set these aside is flawed planning. To seek to develop in preference to these units on flood plain is reckless. To further seek to develop in preference to these units on Green Belt goes against good practise. Whilst the units in Mainland towns previously developed land cannot reach the 60% target the Council go on to identify sites on Canvey Island to enable reaching the Borough's needs. This is confusing as in most other instances the Council promote the notion that Canvey should be viewed as a separate issue with its own housing needs to be fulfilled. This attitude has had the effect of promoting disunity within the Borough.

The tables commencing on Page 3 of the PPS 25 Sequential Test Update Document comment on the Canvey Green Belt sites that Castle Point Council have identified as their preferred development sites. They are described remarkably as ***“low hazard in the event of a flood.”*** However localised established neighbouring housing merits consideration as Scott Wilson's 2006 Strategic Flood Risk Assessment comments

specifically on Canvey Island that:- ***“Any new development will have some effect on flooding in the district. A major consideration in the case of fluvial flooding is that increased land take will cause increased runoff unless SUDS measures are put in place. SUDS drainage is not possible on Canvey Island, because of its low-lying topography. Redevelopment of existing brown field or hard standing sites will in general have a neutral impact on surface water runoff. In the case of tidal flooding, increased development within defended areas increases the residual risk to life and property from a flood event therefore increased care and attention will need to be paid to the maintenance of defences, access and egress from the Island and flood compatibility of buildings.”***

The level of inconsistency demonstrated calls into question the conclusions drawn from this Update Document, as well as the scoring of the sites concerned. The quantity of work put into the Council’s Additional Evidence documents does not make up for the lack of accuracy so as to allow the content to be approved as being sound. This is a Core Strategy document that’s soundness relies on the theory that Canvey Island residents and the resident’s of Benfleet Hadleigh and Thundersley are in some way incompatible, thus promoting a divided Borough. We believe this to be an unfounded argument to substantiate building on a 3a flood risk zone and Green Belt area, and we thus conclude that this PPS25 Sequential and Exception Update fails in it’s attempt to prove very special circumstances so as to promote an inappropriate development.