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**Our ref:** LT/2006/000169/SL-  
03/PO2-L01  
**Your ref:** LP PO Consultation-GEN  
**Date:** 23 November 2017

Dear Mr McAnespie

## Land and Planning Policies Document – Local Plan Part 2

Thank you for consulting us on the submission version of your Local Plan, and for granting us a small extension to our deadline for comments. The extra time has allowed us to take a more proactive approach to agreeing suitable wording with respect to flood risk, rather than making a representation and then continuing discussions at a later date.

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We are now comfortable that, subject to the implementation of the agreed changes set out below, Policy CC3 'Water' will be consistent with national planning policy and 'sound' when read in conjunction with the Nottingham City Aligned Core Strategy. The policy will adequately address the flood risk issues associated with the proposed level of growth over the plan period. We are also strongly supportive of the policy requirements in terms of water quality and water resources, and we are pleased to see the Policy make specific reference to the requirements of the Water Framework Directive (WFD).

### **EA comments on Policy CC3 'Water':**

Whilst we recognise that we previously stated the current policy wording would be sound (November 2016), new information on flood risk has made further changes necessary. In particular, we have since updated our flood risk models for both the River Leen and Day Brook; the new modelling takes account of the new guidance on climate change allowances and shows that the level of flood risk, and the extents, have increased in certain areas adjacent to these watercourses. We will confirm where this is the case in the detailed site specific comments which are set out in Appendix 1.

This is particularly important as the current site allocations include several brownfield sites along the River Leen and Day Brook, where parts of the site fall within the functional floodplain (Flood Zone 3b). Table 3 of the Planning Practice Guidance (PPG) states that only uses classified as 'water compatible' and 'essential infrastructure' are appropriate in Flood Zone 3b. However, there is a documented intention for these sites to deliver housing as part of any redevelopment. We generally support the approach you have taken in terms of avoiding allocating housing numbers to these sites, owing to the uncertainty on how the sites might come forward given the need to mitigate flood

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risk and compensate for lost floodplain storage. Having said that, there is still very little information or policy requirement within the current wording of Policy CC3 'Water' on what is expected as part of any redevelopment of brownfield sites within the functional floodplain. In light of this, we have agreed with you that the following wording will be incorporated into Policy CC3 and the supporting text, to ensure that the redevelopment of brownfield sites within Flood Zone 3b will not only be safe, but will demonstrate exception by reducing flood risk to the site and/or third parties. The proposed wording aims to clearly set out what is expected of developers in these instances, thereby improving the effectiveness, and subsequent soundness, of the policy.

Modifications agreed between EA and Nottingham City Council:

We have agreed that paragraph '8' of Policy CC3 will be amended to the following wording:

- 8. *Where Proposed development in areas of flood risk is ~~considered acceptable~~, it will only be considered appropriate when informed by an acceptable site specific flood risk assessment, following the Sequential Test and if required, the Exception Test.*

We have agreed that a new paragraph will be added to Policy CC3, numbered '9', which states the following:

- 9. *Any development of sites within the functional floodplain of the River Leen and Day Brook will be required to compensate for the loss of floodplain on a level for level basis, be resistant and resilient to flooding through design and layout, and commit to provide onsite flood defence works and/or contribute towards off site schemes which reduce the risk of flooding to the site and/or third parties.*

We have also agreed that the following paragraph will be added to the supporting text under 'Justification', as paragraph 3.32:

- 3.32. *The Council has identified a number of development of sites within the functional floodplain of the River Leen and Day Brook. These are largely underused brownfield sites and their development is intended to; mitigate against flooding, contribute to the City's regeneration, and help meet the development requirements of the City. Development in these areas will be required to; compensate for the loss of floodplain, be resistant and resilient to flooding through design and layout, and provide flood defence works in order to reduce the risk of flooding to the site and/or third parties. Opportunities should be sought for a 'linked' solution where these sites and their associated flood risk and mitigation are considered together.*

In conclusion, we would like to reiterate we consider Policy CC3 sound subject to the changes set out above. Please see Appendix 1 for our detailed comments on specific sites, which will hopefully be of use when updating the various studies which form your evidence base.

**EA comments on Policies EN5 and EN6:**

We have previously indicated our support for these policies, albeit with recommendations for minor alterations. Having reviewed the final wording of both policies we are content that they are both clear and concise, and ultimately sound.

Yours sincerely

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**Mr Rob Millbank  
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**APPENDIX 1 – General EA comments on specific sites**

Please find below our detailed comments on specific sites. These comments cover all of the issues within our remit as a statutory planning consultee, and may also include other areas of interest related to partnership working and/or our role as a regulator.

#### **PA01 - Bestwood Road (Former Bestwood Day Centre)**

Support – Subject to the mitigation measures identified at the Issues & Options stage and the site specific requirement for funding opportunities as identified at Appendix 4 (Site Assessment and Process Sequential / Exception Test Background Paper).

This preferred option is located immediately adjacent to the River Leen, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of housing that can be accommodated on this site.

The site does not benefit from any formal flood defences. Therefore, any development or raising of land levels within the floodplain will need to be compensated for by the lowering of an equivalent area and volume of land that is currently outside, but adjacent to, the floodplain.

#### **PA02 – Blenheim Lane**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific flood risk assessment (FRA) focusing on sustainable surface water management is required.

#### **PA03 – Former Eastglade Primary and Nursery School**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA04 - Linby Street / Filey Street**

We advised at the Issues and Options stage that it may be difficult to mitigate the impact of flood risk due to the expected depths and velocities of floodwater on site during a flood event, which may pose a significant risk to people and property. We do have concerns about the overall deliverability of this site, housing in particular, but we are mindful that the Plan makes no commitment to specific housing numbers in recognition of these challenges. We also accept that it is not within our remit to comment on the viability of development proposals, and if your Authority are content that the redevelopment of this site is viable then that is your decision to make. However, we would like to reiterate it is highly likely the Environment Agency will only support proposals on this site which clearly demonstrate they will reduce the existing flood risk to the site and third parties, in line with the further wording of Policy CC3 'Water'.

The National Planning Policy Framework (NPPF) states that the sequential test should steer development to areas with the lowest probability of flooding. Whilst this site is shown to have a high probability of flooding, we note that your Authority consider the flood risk sequential test has been passed, and the evidence has been submitted as part of the Local Plan process confirming how the test has been applied and passed. The Environment Agency do not scrutinise sequential test evidence but it is within our

remit to check that the test has been applied, with evidence submitted to demonstrate this. Your Authority will ultimately need to be content that development of this site satisfies the requirements of both the sequential and exception tests.

This potential site allocation is located immediately adjacent to the River Leen, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

Please note that this preferred site allocation does not benefit from any formal flood defences. Therefore, any development or raising of land levels within the floodplain will need to be compensated for by the lowering of an equivalent area and volume of land that is currently outside, but adjacent to, the floodplain. This will be challenging to provide within the site boundary.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA05 – Former Padstow School Detached Playing Field (Ridgeway)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA06 – Former Padstow School Detached Playing Field (Beckhampton Road)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA07 – Hucknall Road/Southglade Road (Southglade Food Park)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

#### **PA08 – Former Padstow School**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA09 – Haywood Detached Playing Field**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA10 – Former Henry Mellish School Playing Field (Piccadilly)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA11 – Stanton Tip**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP. Whilst the site is located outside of the floodplain (Zone 1), there is the potential for localised overland flooding due to the steep-sided slopes.

Our records show there is a culverted watercourse that runs beneath the former tip. The alignment of the culvert should be established and there should be no built development on top of the culvert. Where practicable, the opportunity should be taken to open up the watercourse, which could provide a green corridor with associated amenity and wildlife benefits. Nottingham City Council's Drainage Engineers will be able to advise if an easement is required should the watercourse be opened up.

### **PA12 – Former Henry Mellish Main School**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA14 – Arnside Road (Former Chronos Richardson)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA15 – Bulwell Lane (Former Coach Depot)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

### **PA16 – Nottingham Business Park North**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA17 – Woodhouse Park (Formerly Nottingham Business Park South)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

### **PA18 – Vernon Road (Former Johnson Dyeworks)**

Support – Subject to the mitigation measures identified at the Issues & Options stage and the site specific requirement for funding opportunities as identified at Appendix 4 (Site Assessment and Process Sequential / Exception Test Background Paper).

We advised at the Issues and Options stage that it may be challenging to manage the impact of flood risk off-site. Particularly as the site currently partially resides in functional floodplain flood zone 3b.

This preferred option site is located immediately adjacent to the Day Brook, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater.

This site does not benefit from any formal flood defences. Therefore, any development or raising of land levels within the floodplain will need to be compensated for by the lowering of an equivalent area and volume of land that is currently outside, but adjacent to, the floodplain. This will be challenging to provide within the site boundary.

The River Leen and Day Brook Strategic Flood Risk Assessment (SFRA) found that the River Leen catchment has been subject to extensive urbanisation and responds rapidly to rainfall. As such, the SFRA recommends that surface water run-off generated by new development is restricted to greenfield rates and utilises Sustainable Drainage Systems (SuDS).

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA19 – Lortas Road**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA20– Haydn Road/Hucknall Road - Severn Trent Water Depot**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA21 – Sherwood Library**

Support – There are no environmental concerns within our remit.

Please consider our comments on PA22, PA23, PA27, PA29 and PA30 in conjunction. All of these sites fall within areas at risk of flooding from the River Leen and as they are hydraulically linked development on one site can have an impact on the other sites downstream.

For each of these sites Nottingham City Council will need to assess the deliverability and viability of development in these locations as there is significant risk of flooding in the climate change scenarios. This will include providing floodplain compensation.

### **PA22 - Western Boulevard**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This preferred option site is located immediately adjacent to the River Leen, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA23 Radford Road - Former Basford Gasworks**

Support – We note that this site benefits from planning permission (12/02756/FUL) however the mitigation measures identified at the Issues & Options stage and the site specific requirement for funding opportunities as identified at Appendix 4 (Site Assessment and Process Sequential / Exception Test Background Paper) should be implemented.

This preferred option site is located immediately adjacent to the River Leen, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA27 – Wilkinson Street (Former PZ Cussons) - Bobbers mill**

Support – We are aware that this site has an extant planning permission (10/00021/POUT).

Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP. Since the River Leen modelling was updated in 2017 a larger proportion of the site lies in functional floodplain. We recommend that any development taking place either excludes these areas or provides a strategy to reduce flood risk to third parties.

This preferred option site is located immediately adjacent to the River Leen, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA29 - Bobbers Mill Industrial Estate (land adjacent)**

Support – Subject to the mitigation measures identified at the Issues & Options stage and the site specific requirement for funding opportunities as identified at Appendix 4 (Site Assessment and Process Sequential / Exception Test Background Paper).

The main flood risk to the site is experienced due to overtopping of the railway line. A holistic scheme in partnership with other developments within the Bobbers Mill area is a potential solution to prevent flooding to the railway line and to the site.

The flood risk to and from the site will need to be managed, incorporating flood resilience within the design, floodplain compensation and mitigation measures are required, including floor levels 600mm above the 1 in 100 year plus climate change scenario should be considered with safe access and egress for the occupants and the Emergency Services.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We also encourage that SuDS must be incorporated within development at an early stage and ensure that greenfield runoff rates are achieved from a managed surface water drainage scheme.

### **PA30 – Bobbers Mill Bridge (Bobbers Mill Industrial Estate)**

Support – Subject to the mitigation measures identified at the Issues & Options stage and the site specific requirement for funding opportunities as identified at Appendix 4 (Site Assessment and Process Sequential / Exception Test Background Paper).

We advised at the Issues and Options stage that it may be challenging to manage the impact of flood risk off-site.

The River Leen, which is designated as a Main River, runs through this preferred option site. As the River Leen is classed as a Main River it means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8

metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

The site does not benefit from any formal flood defences. Therefore, any development or raising of land levels within the floodplain will need to be compensated for by the lowering of an equivalent area and volume of land that is currently outside, but adjacent to, the floodplain.

The River Leen and Day Brook Strategic Flood Risk Assessment (SFRA) recommends that surface water run-off generated by new development is restricted to greenfield rates and utilises Sustainable Drainage Systems (SuDS).

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA24 – Melbury School Playing Field**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA25 – Chingford Road Playing Field**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA26 – Denewood Crescent (Denewood Centre)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA32 – Beechdale Road (South of Former Co-op Dairy)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

#### **PA33 – Chalfont Drive**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA34 – Beechdale Baths and Ambulance Service HQ**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

**PA35 – Woodyard Lane (Siemens)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

**PA36 - Russell Drive - Radford Bridge Allotments**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

**PA37 – Robin Hood Chase**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

**PA38 – Carlton Road – (Castle College)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

**PA39 – Carlton Road - Former Co-op**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

**PA40 – Daleside Road - Former Colwick Service Station**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

**PA41 – Forest Mill**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

**PA42 – Radford Mill**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

**PA43 - Salisbury Street**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This preferred option is predominantly located within Flood Zone 1, however the western boundary (Faraday Road) is located within Flood Zone 3 and therefore is at high risk of flooding.

The River Leen and Day Brook 2017 model demonstrates that Faraday Road could be subjected to flooding during a 1 in 20 year event. Therefore, level for level floodplain compensation should be considered as well as access and egress arrangements showing alternative routes to and from the site.

We consider that mitigation measures should include finished floor levels of 600mm above the 1 in 100 year plus climate change flood level. A FRA must consider the impacts on and from the River Leen.

We recommend that SuDS be incorporated within development at an early stage and ensure that greenfield runoff rates are achieved from a managed surface water drainage scheme.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA44 – Sandfield Centre**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA45 – Prospect Place**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

Please consider our comments on PA46 and PA47 in conjunction. All of these sites fall within areas at risk of flooding from the River Leen and as they are hydraulically linked development on one site can have an impact on the other sites downstream.

For each of these sites Nottingham City Council will need to assess the deliverability and viability of development in these locations as there is significant risk of flooding in the climate change scenarios. This will include providing floodplain compensation.

#### **PA46 - Derby Road - Former Hillside Club**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The River Leen, which is designated as a Main River, runs in culvert through the north western part of this preferred site allocation and then in open channel along the western boundary. The alignment of the culvert should be established and where practicable, the opportunity should be taken to open up the watercourse, which could provide a green corridor with associated amenity and wildlife benefits.

As the River Leen is classed as a Main River it means that our prior written consent is required for any works within 8 metres from the top of bank and culvert. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when

making assumptions about the amount of development that can be accommodated on this site.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. The River Trent model was updated in 2016 and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change as well as a 1 in 100 year plus 30% climate change breach scenario. This site falls within all of these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA47 - Abbey Street/Leengate**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The River Leen, which is designated as a Main River, runs through the western part of this preferred site allocation. This site features a flood wall which offers a 1 in 100 year level of flood protection. As the River Leen is classed as a Main River it means that our prior written consent is required for any works within 8 metres from the top of the bank and flood wall. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater. The effects of the development on downstream users will also need to be considered.

Note that the River Leen and Day Brook flood model was updated in January 2017. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change and 1 in 100 year plus 50% climate change. The River Trent model was updated in 2016 and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change as well as a 1 in 100 year plus 30% climate change breach scenario. This site falls within all of these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA49 NG2 West - Enterprise Way**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Future development should consider the Greater Nottingham SFRA data for the site and flood mitigation should consider the residual risk of both overtopping and breach of the River Trent flood defences. Also the River Leen, a designated Main River, flows from

west to east, to the south of the site. We advise that a site specific flood risk assessment considers the risk of flooding from this source to the development.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA50 – NG2 South**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Future development should consider the Greater Nottingham SFRA data for the site and flood mitigation should consider the residual risk of both overtopping and breach of the River Trent flood defences. Also the River Leen, a designated Main River, flows from west to east, to the south of the site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The River Leen, which is designated as a Main River, runs through the southern part of this preferred site allocation. This site features a sheet piled flood defence which offers a 1 in 100 year level of flood protection. As the River Leen is classed as a Main River it means that our prior written consent is required for any works within 8 metres from the top of the bank and flood wall. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Leen for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of development that can be accommodated on this site.

### **PA52 - Nottingham Science & Technology Park**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Please note that the Tottle Brook ordinary watercourse runs to the north of this preferred option and Enterprise Zone and a site-specific FRA should give consideration to the risk of flooding presented by this source.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA53 – Electric Avenue**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Data from the Greater Nottingham Strategic Flood Risk Assessment (GNSFRA) should be considered when developing the site, e.g. level of overtopping in climate change scenario, which effects the north east part of the site and flood mitigation to consider the residual risk of both overtopping and breach of the River Trent flood defences.

The Tottle Brook (Ordinary Watercourse) flows from west to east, through the roundabout, in culvert north of the site. We advise that an FRA considers the risk of flooding from this source to the development.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA54 - Boots**

Support -This preferred allocation and Enterprise Zone is located immediately behind formal flood defences. The site-specific FRA should consider the residual risk of flooding from a breach or overtopping of the flood defences and incorporate a site layout that does not increase flood risk on and off site.

There is a gas-fired Combined Heat and Power Plant on-site that is regulated by the Environment Agency. There should be careful consideration that the re-development of this site does not lead to air quality issues by the introduction of new sensitive receptors.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA55 – Rear of 107 – 127 Ruddington Lane**

The National Planning Policy Framework (NPPF) states that the sequential test should steer development to areas with the lowest probability of flooding. Whilst this site is shown to have a high probability of flooding, we note that your Authority consider the flood risk sequential test has been passed, and the evidence has been submitted as part of the Local Plan process confirming how the test has been applied and passed. The Environment Agency do not scrutinise sequential test evidence but it is within our remit to check that the test has been applied, with evidence submitted to demonstrate this. Your Authority will ultimately need to be content that development of this site satisfies the requirements of both the sequential and exception tests.

Safe access and escape will be required in a site specific FRA including consideration of the likely depths and velocities of floodwater, or consideration of raising the access, with flood compensation works to and from the site.

This potential site allocation is underlain by a Secondary Aquifer and located within Source protection zone 3, where groundwater is sensitive to pollution and will require careful consideration and an environmental assessment.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA56 – The Spinney**

The National Planning Policy Framework (NPPF) states that the sequential test should steer development to areas with the lowest probability of flooding. Whilst this site is shown to have a high probability of flooding, we note that your Authority consider the flood risk sequential test has been passed, and the evidence has been submitted as part of the Local Plan process confirming how the test has been applied and passed. The Environment Agency do not scrutinise sequential test evidence but it is within our remit to check that the test has been applied, with evidence submitted to demonstrate this. Your Authority will ultimately need to be content that development of this site satisfies the requirements of both the sequential and exception tests.

The majority of the site falls within a number of modelled flood outlines for the Fairham Brook which will need to be considered in a flood risk assessment. Due to the location and vulnerability of the development it is required that the flood risk assessment considers the Higher Central ( 30%) and Upper ( 50%) allowances for climate change scenarios. This may require additional modelling if the data is not currently available.

Consideration of flood mitigation is required in a site specific FRA. The site is afforded safe access and egress onto Sturgeon Lane and Brooksby Lane.

This site is underlain by a Secondary Aquifer, where groundwater is sensitive to pollution and will require careful consideration and an environmental assessment.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA57 – Clifton West**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA58 - Fairham House**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA59 - Fairham Comprehensive School**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This preferred option is located immediately adjacent to the Fairham Brook, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the Fairham Brook for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of housing that can be accommodated on this site.

The north east of the site falls within a number of modelled flood outlines for the Fairham Brook which will need to be considered in a flood risk assessment. Due to the location and vulnerability of the development it is required that the flood risk assessment considers the Higher Central ( 30%) and Upper ( 50%) allowances for climate change scenarios. This may require additional modelling if the data is not currently available.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater.

This site does not benefit from any formal flood defences. Therefore, any development or raising of land levels within the floodplain will need to be compensated for by the lowering of an equivalent area and volume of land that is currently outside, but adjacent to, the floodplain.

#### **PA60 – Victoria Centre**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA61 Royal Quarter - Burton Street, Guildhall, Police Station and Fire Station**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA62 – Brook Street East**

This potential site allocation is underlain by a Principal Aquifer and located within Source protection zone 3, where groundwater is sensitive to pollution and will require careful consideration and an environmental assessment.

#### **PA64 – Creative Quarter – Sneinton**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA65 – Creative Quarter – Bus Depot**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

### **PA66 – Castle Quarter (People’s College)**

Support – There are no environmental concerns within our remit.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA67 intu Broadmarsh Centre**

Support - We understand that this potential site allocation benefits from an extant outline planning permission (09/02714/POUT) granted in 2011 for the proposed retail allocation and therefore the comments we made at the planning application stage remain valid.

For new applications note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA68 – Canal Quarter – Island Site**

Support – Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The comments we made for the planning application (04/01403/POUT) remain valid.

For new applications note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in

100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA69 Canal Quarter - Station Street/Carrington Street**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Future development should consider the GNSFRA data for the site and flood mitigation should consider the residual risk of both overtopping and breach of the River Trent flood defences.

#### **PA70 – Canal Quarter – Queens Road (East of Nottingham Station)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA71 – Canal Quarter - Sheriffs Way (Sovereign House)**

No objections – The comments we made for the planning application (06/01916/PFUL3) remain valid.

For new applications note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The Tinkers Leen is a culverted ordinary watercourse that runs along the northern boundary of this preferred site allocation. The alignment of the culvert should be established and there should be no built development on top of the culvert. Where practicable, the opportunity should be taken to open up the watercourse, which could provide a green corridor with associated amenity and wildlife benefits. Nottingham City Council's Drainage Engineers may be able to provide further information about the culverted watercourse and will be able to advise if an easement is required should the watercourse be opened up.

#### **PA72 - Canal Quarter - Waterway Street**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The Tinkers Leen is a culverted ordinary watercourse that runs along the northern boundary of this preferred site allocation. The alignment of the culvert should be established and there should be no built development on top of the culvert. Where practicable, the opportunity should be taken to open up the watercourse, which could provide a green corridor with associated amenity and wildlife benefits. Nottingham City Council's Drainage Engineers may be able to provide further information about the culverted watercourse and will be able to advise if an easement is required should the watercourse be opened up.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA73 – Canal Quarter – Sheriffs Way / Arkwright Street**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA74 – Canal Quarter – Arkwright Street East**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA75– Canal Quarter Crocus Street (South Point)**

Support - We were consulted on the renewal of planning permission 04/02843/PFUL3 for this preferred site allocation, where an acceptable Flood Risk Assessment was submitted and we raised no concerns to the proposed renewal. The information we received demonstrated to us that environmental issues within our remit can be satisfactorily addressed on-site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA76 – Waterside – London Road (Former Hartwells)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This potential site allocation is located outside of the floodplain (Zone 1) although it should be noted that the site abuts an area of flood risk.

The site is greater than 1 hectare and a site specific FRA focusing on sustainable surface water management is required.

#### **PA77 – Waterside – London Road (South of Eastcroft Depot)**

This potential site allocation is located in an area of high flood risk (Zone 3) and it will be necessary for Nottingham City Council to undertake the flood risk Sequential Test in accordance with the NPPF.

In the first instance all development should be locating within flood zone1 (low risk). Where it is deemed that no reasonably available sites are available, the development should then be directed to Zone 2. Again, where there are no reasonably available sites should development be considered in flood zone 3, where the development must provide wider sustainability benefits to the community that outweigh the negative effects of flooding.

The Nottingham Canal acts as a flow route for floodwater and a site-specific Flood Risk Assessment should carefully consider the interaction of the canal.

Safe access and escape will be required in a site specific flood risk assessment including consideration of the likely depths and velocities of floodwater, or consideration of raising the access, with flood compensation works to and from the site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **PA78 – Waterside – London Road (Eastcroft Depot)**

The National Planning Policy Framework (NPPF) states that the sequential test should steer development to areas with the lowest probability of flooding. Whilst this site is shown to have a high probability of flooding, we note that your Authority consider the flood risk sequential test has been passed, and the evidence has been submitted as part of the Local Plan process confirming how the test has been applied and passed. The Environment Agency do not scrutinise sequential test evidence but it is within our remit to check that the test has been applied, with evidence submitted to demonstrate

this. Your Authority will ultimately need to be content that development of this site satisfies the requirements of both the sequential and exception tests.

The Nottingham Canal acts as a flow route for floodwater and a site-specific Flood Risk Assessment should carefully consider the interaction of the canal.

Safe access and escape will be required in a site specific flood risk assessment including consideration of the likely depths and velocities of floodwater, or consideration of raising the access, with flood compensation works to and from the site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA79 – Waterside – Iremonger Road**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

The Nottingham Canal acts as a flow route for floodwater and a site-specific Flood Risk Assessment should carefully consider the interaction of the canal.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater. The Nottingham Canal acts as a flow route for floodwater and these issues should be considered in the site-specific Flood Risk Assessment.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA80 – Waterside – Cattle Market**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Future development should consider the Greater Nottingham SFRA data for the site and flood mitigation should consider the residual risk of both overtopping and breach of the River Trent flood defences.

The Tinkers Leen (Ordinary Watercourse) flows along County Lane in culvert and discharges to the River Trent, just downstream of the site. Flooding was experienced in 2000 in this area and it is recommend that flooding from both the River Trent and Tinkers Leen is considered within the site specific flood risk assessment.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50%

climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA81 - Waterside – Meadow Lane**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This preferred option is located immediately adjacent to the River Trent, which is designated as a Main River. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Trent for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of housing that can be accommodated on this site.

The Tinkers Leen is an ordinary watercourse that runs in culvert through the potential site allocation. The alignment of the culvert should be established and there should be no built development on top of the culvert. Where practicable, the opportunity should be taken to open up the watercourse, which could provide a green corridor with associated amenity and wildlife benefits. Nottingham City Council's Drainage Engineers may be able to provide further information about the culverted watercourse and will be able to advise if an easement is required should the watercourse be opened up.

Safe access and escape will be required to and from the site, including consideration of the likely depths and velocities of floodwater. The Nottingham Canal acts as a flow route for floodwater and these issues should be considered in the site-specific Flood Risk Assessment.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA82 – Waterside – Freeth Street**

This preferred site is located immediately adjacent to the River Trent and our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Trent for essential maintenance and flood risk management work.

This should be incorporated into development layouts and taken into account when making assumptions about the amount of housing that can be accommodated on this site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for

developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA83 - Waterside – Daleside Road (Trent Lane Basin)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This preferred site is located immediately adjacent to the River Trent and our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Trent for essential maintenance and flood risk management work.

This should be incorporated into development layouts and taken into account when making assumptions about the amount of housing that can be accommodated on this site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA85 - Waterside – Trent Lane (Park Yacht Club)**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

This preferred site allocation is located immediately adjacent to the River Trent and does not benefit from any formal flood defences. This means that our prior written consent is required for any works within 8 metres from the top of bank. We may wish for the 8 metres strip to be kept free of built development in order to safeguard our access to the River Trent for essential maintenance and flood risk management work. This should be incorporated into development layouts and taken into account when making assumptions about the amount of housing that can be accommodated on this site.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **PA86 Thane Road - Horizon Factory**

Support - Subject to the specific ideas for mitigation identified in the Sustainability Appraisal and development principles within the LAPP.

Note that the River Trent flood model was updated in 2016. This model reflects the new climate change guidance and features modelled flood outlines for 1 in 100 year plus 20% climate change, 1 in 100 year plus 30% climate change, 1 in 100 year plus 50% climate change and a 1 in 100 year plus 30% climate change breach scenario. This site falls within these modelled outlines and therefore needs to be considered in the FRA for

developments taking place at this site. The latest climate change guidance is available at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

END OF COMMENTS.