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Chair
DNA Steering Group

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Our ref: SL/2007/101451/OR-16/IS1-L01

Your ref: Email

Date: 19 December 2019

Dear Joyce Jacca,

Lewisham Deptford Neighbourhood Action Draft Neighbourhood Plan Consultation.

Thank you for consulting us on the above. We would like to offer the following advice with respect to flood risk:

The area of Deptford is subject to tidal flood risk from the River Thames. Areas within the Neighbourhood Plan may fall within one of three flood zones within Deptford:

- Flood Zone 1 – comprises land assessed as having less than 0.1% (1 in 1000) chance of flooding in any year
- Flood Zone 2 – comprises land assessed as having between a between a 0.5% (1 in 200) and 0.1% (1 in 1000) annual probability of tidal flooding
- Flood Zone 3 - comprises land assessed as having a 0.5% (1 in 200) or greater annual probability of tidal flooding

The borough Strategic Flood Risk Assessment (SFRA) has outlined specific development control recommendations that should be placed upon development within Zone 3a High Probability to minimise the damage to property, the risk to life in case of flooding, and the need for sustainable drainage techniques (SUDS). It is essential that the developer carries out a detailed Flood Risk Assessment for their site to consider the site based constraints that flooding may place upon the proposed development.

Areas Benefiting from Flood Defences

The area of Deptford may be also located within an area benefiting from flood defences, as shown on our published Flood Map for Planning available externally at <https://www.gov.uk/check-flood-risk>

Areas benefiting from flood defences are defined as those areas which benefit from flood defences specifically in the event of flooding from rivers with a 1% (1 in 100) chance in any given year, or flooding from the sea with a 0.5% (1 in 200) chance in any given year. The design standard of protection of the flood defences in this area of the Thames is 0.1% AEP; they are designed to defend London up to a 1 in 1000 year tidal flood event.

If the defences were not there, these areas would be flooded. An area of land may benefit from the presence of a flood defence even if the defence has overtopped, if the presence of the defence means that the flood water does not extend as far as it would if the defence were not there.

Thames Tidal Upriver Breach Inundation Modelling 2017

The area of Deptford maybe covered by our breach modelling. We advise that sites are also assessed using our breach data. This is to ensure that the development can be appropriately assessed in terms of flood risk and the appropriate measures taken within the development to ensure the impact of flooding is minimal. Please contact our local Customer & Engagement Team at KSLE@environment-agency.gov.uk for further details.

Thames Estuary 2100 (TE2100)

The plan is the overarching flood management strategy for the Thames Estuary and therefore any development planning should consider the objectives of the TE2100 plan.

The flood risk management policy set out in the TE2100 Plan for Greenwich and Lewisham is the Greenwich and Wandsworth to Deptford policy units: Policy P5, to take further action to reduce flood risk beyond that required to keep pace with climate change. This means that the standard of protection against tidal flooding will be increased in the future.

Flood Risk Activity Permits

Please be aware that the River Thames and the Ravensbourne (Deptford-Tidal) is a designated 'main river' and under the Environmental Permitting Regulations (England and Wales) 2016, certain activities in, over or under the main river or within 16 metres of a sea defence may require a flood risk activity permit (<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>).

Changes to the data we give to developers and consultants

As of 11 November, we no longer package responses to requests for our flood data (known as 'products') to consultants and developers who already have the ability to access and use the data from our own flood models. Both [Product 3 and Product 4](#) packages provide site-specific information such as flood maps and modelled flood levels extracted from our flood models, which can be used to help inform a Flood Risk Assessment (FRA) submitted in support of a planning application. We now expect some customers to extract such data from our flood model themselves.

We have communicated these changes to the relevant customers and have created an 'FRA checklist' (attached) that they should follow when producing their FRAs. Although this is not a mandatory requirement, you may start to see this checklist accompanying some FRAs submitted in support of planning applications. Please note the 'FRA checklist' is not a substitute for an FRA. This change will not affect your own validation process.

We continue to advise that all planning applications should be supported by a site-specific FRA where required, as specified under the [National Planning Policy Framework](#) (NPPF) (Paragraph 160, Footnote 50).

Publication of Association of Directors of Environment, Economy, Planning and Transport (ADEPT) climate change guidance

New guidance, titled: '[Preparing for a Changing Climate: Good Practice Guidance for Local Government](#)' has been published on the ADEPT website.

The [ADEPT climate change position statement](#) may also be of interest to your teams.

Flood risk emergency plans

We've worked with the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) to produce some joint guidance on flood risk emergency plans for new development.

The guidance is principally aimed at local authority planners, to help them understand when they should be asking for planning applications to be supported by emergency plans, and what should be included in them. [The guidance can be found here.](#)

Essential reading for developers and planning authorities wishing to achieve biodiversity net gain in estuaries/tidal rivers

We have updated our 2008 guidance for encouraging wildlife into urban estuaries and improving the estuary edges for people. www.estuaryedges.co.uk is an interactive web site providing 17 overarching design principles, along with more detailed advice and list of case studies. It now includes consideration of litter, navigation, waves/currents and more case studies underpinned by ecological sampling. We encourage you to share this advice with developers in your pre-planning application meetings.

Biodiversity metric 2.0

Biodiversity net gain is fast rising up the planning agenda. The [Biodiversity metric 2.0](#) was published in beta format by Natural England in July 2019. It will underpin any future mandatory requirements but in the meantime can be used by developers and planning authorities to meet local plan requirements. It has been developed with LPA, developer and ecologist input and advice.

Please do not hesitate to contact us should you wish to discuss this further.

Yours sincerely,

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