

From: NWNorthPlanning <CLPlanning@environment-agency.gov.uk>
Sent: 13 June 2022 12:49
To: julian.jackson@blueyonder.co.uk
Cc: chairman@martonmossforum.org
Subject: RE: MARTON MOSS NEIGHBOURHOOD PLAN

Hello Julian,

Revising a site boundary to exclude areas of Flood Zone 2 or 3 would be acceptable to the Environment Agency.

However, we would remind you that the sequential test applies to flood risks from all sources. Sites are considered to be in a flood risk area if it they are in Flood Zone 2 or 3, or within Flood Zone 1 and shown to be at future flood risk or at risk from other sources of flooding, such as surface water or groundwater.

We would advise that you check whether any proposed site allocations outside of Flood Zone 2 or 3 could still be in a flood risk area, and carry out the sequential test accordingly. This should be informed by the LPA's strategic flood risk assessment.

Please also refer to the guidance in paragraphs 61 to 64 of the Flood Risk and Coastal Change section of the Planning Practice Guidance on GOV.UK (<https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-in-neighbourhood-plans>).

I trust the above is of assistance.

Best regards,

Alex

Alexander Hazel

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From: julian.jackson@blueyonder.co.uk <julian.jackson@blueyonder.co.uk>
Sent: 09 June 2022 16:24
To: NWNorthPlanning <CLPlanning@environment-agency.gov.uk>
Cc: Hazel, Alex <Alex.Hazel@environment-agency.gov.uk>; chairman@martonmossforum.org
Subject: MARTON MOSS NEIGHBOURHOOD PLAN

Hello Alex

Many thanks for your helpful responses to the Neighbourhood Plan proposals. Three sites proposed for allocation in the Plan (Refs K, M and N) and one potential additional one (Stan's Mowers) are affected by Flood Zone 2.

In your responses you refer to the Sequential Test approach to evaluating the appropriateness of allocating such sites. However that approach cannot be applied in the case of the Neighbourhood Plan. That is because there is in fact no housing requirement imperative for these sites to be allocated. That is because the total amount of new housing required to be built in Blackpool is not dependent on any contribution from Marton Moss. There is therefore no potentially over-riding justification for sites in Flood Zone 2 to be allocated. It is therefore intended that the sites so affected will not be allocated.

The one potential exception to this is site N – Marina Nurs, New Hall Avenue. Only a small part of this site is within Flood Zone 2. If the site extent was amended to exclude that affected part and as a consequence the expected dwelling yield reduced from 3 to 2 detached dwellings would that be acceptable to the Agency?

Happy to discuss this matter.

Best regards

Julian