## Environmental Challenges

#### Flood Risk

### Policy 115

#### **Reducing Flood Risk**

In order to address existing flood risk and to reduce the impact of new development, the Council will:

- Work with the Environment Agency, landowners and developers, based on the findings of the most recent SFRA and other Plans, to manage and reduce flood risk from all sources of flooding.
- Apply the sequential and exception tests to avoid inappropriate development in relation to flood risk.
- Implement sustainable drainage system (SUDs) across the borough and work towards effective management of surface water flooding.
- Fully engage in flood risk emergency planning including the pre, during and post phases of flooding event.
- Propose ensure the implementation of measures to mitigate flood risk across the borough that are effective, viable, attractive and enhance the public realm and ensure that any residual risk can be safely managed.

To minimise river flooding risk, development in Flood Risk Areas (Environment Agency Flood Zones 2 and 3 and surface water flood risk hotspots) will be required to seek opportunities to deliver a reduction in flood risk compared with the existing situation.

In Flood Risk Areas the sequential test and exception test as set out in the NPPF and associated technical guidance should be applied. Flood Risk Assessments should be submitted in support of all planning applications in these areas and for major development proposals across the Borough.

All development proposals should reduce surface water run-off entering the sewerage network reduce rainwater run-off through the use of suitable Sustainable Drainage Systems (SUDS) as far as possible.

#### **Supporting Text**

**7.0.21** The Government sets out requirements for planning and development in relation to flood risk in the National Planning Policy Framework and Technical Guidance. Local Planning Authorities have a responsibility to ensure that inappropriate development in areas of flood risk is avoided, that new development does not increase vulnerability to

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flooding and that risks are managed through suitable long-term measures. Opportunities to improve existing vulnerable areas should be taken, for example, by incorporating sustainable drainage systems in new developments or incorporating green infrastructure.

**7.0.22** The London Plan reiterates the national importance given to flood risk assessment, advising Boroughs that they should use Strategic Flood Risk Assessments when developing their Local Plans, identify areas with surface water management problems and encourage development to use Sustainable Urban Drainage Systems (SUDS).

**7.0.23** Bromley is covered by two river catchments, the Ravensbourne and the Cray and both of these rivers and many of their tributaries have their source in Bromley. The risk of fluvial flooding within the urban parts of Bromley has been greatly reduced by the construction of defences and channel culverting, however there are still some problems with surface water flooding in the urban area.

**7.0.24** In accordance with national guidance, Bromley Council has produced a strategic flood risk assessment (SFRA) which identifies areas of the Borough that are at risk of flooding from a range of sources. This study is being updated to accompany the development of the Local Plan, both to help develop future policy and to inform the process of site allocation.

**7.0.25** Flood Risk Areas have been identified which include Environment Agency Flood Zones 2 and 3 and surface water flood risk hotspots. In these areas particular attention needs to be paid to reducing both the existing and potential risk from flooding and therefore any new development will be required to assess its potential impact and mitigate accordingly. Outside these areas, major developments, as a result of their nature in being larger or more significant, will also be required to make a full assessment of their impacts.

**7.0.26** To address the contribution that even small developments can make to flooding problems, all developments should aim to reduce surface water run-off to sewers and minimise rainwater run-off by following the drainage hierarchy set out in the London Plan (see SUDS policy below).

**7.0.27** The Council will update Bromley's Strategic Flood Risk Assessment every 5 years or more frequently if circumstances require, ensuring that changes in flood risk area are identified and suitable responses implemented.

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### Policy 116

### Sustainable Urban Drainage Systems (SUDS)

All developments should seek to incorporate Sustainable Urban Drainage Systems (SUDS) or demonstrate alternative sustainable approaches to the management of surface water as far as possible.

Applications for developments located within Flood Zones 2, 3a and 3b and in Flood Zone 1 for areas identified as hot spots in Bromley's Surface water Management Plan (SWAMP), Preliminary Flood Risk Assessment (PFRA) and in the Strategic Flood Risk Assessment must be accompanied by a site-specific Flood Risk Assessment (FRA).

### Supporting Text

**7.0.28** Flood Risk Assessments should be prepared in accordance with technical guidance from DEFRA and the Environment Agency and will be required to demonstrate that the following measures have been taken:

**7.0.29** Application of a site wide sequential approach to development by locating buildings within the areas of lowest flood risk on a site in accordance with the areas set out within the Surface Water Management Plan as areas with increased risk of surface water flooding.

**7.0.30** Determination of potential overland flow paths and proposals for appropriate solutions to minimise the impact of development on surface water flooding. Road and building configuration should be considered to preserve existing flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere,

**7.0.31** In line with the preferred standard in the Mayor's Sustainable Design and Construction SPG, SUDS measures should aim to achieve 100% attenuation of the undeveloped (existing) sites surface water run-off at peak times. If 100% attenuation is not achievable, justification should be provided. In the areas outlined in the Surface Water Management Plan and in the Local Strategy as areas with increased risk of surface water flooding, a FRA should mitigate off site surface water flooding by aiming to achieve greenfield run-off rates or better. SUDS techniques should be applied with regard to the London Plan Sustainable Drainage Hierarchy outlined in Policy 5.13 or such guidance as supersedes it. Demonstrable justification should be provided on the extent to which each measure is being proposed.

**7.0.32** Incorporation of soft landscaping and permeable surfaces into all new residential and non-residential developments. Retention of soft landscaping and permeable surfaces in front gardens and other means of reducing, or at least not increasing the amount of hard standing associated with existing homes is encouraged. New driveways or parking areas associated with non-residential developments and those located in front gardens should be made of permeable material.