



SO CG 07

Statement of Common Ground between  
BCP Council and Environment Agency  
(0164)



BCP Local Plan Examination

10 October 2024

## 1. General

- 1.1 The Council has prepared this Statement of Common Ground (SOCG) to assist the Inspector at the BCP Local Plan Examination.
- 1.2 The Environment Agency's response to the public consultation on the Draft BCP Local Plan (March 2024) identified some issues with the Draft Local Plan. The purpose of this SOCG is to set out the agreed position between BCP Council and Natural England (representor id 0164).

## 2. Declaration

Name	Organisation	Signature	Date
Chloe Oliver Planning Policy Officer	BCP Council		03/12/2024
Matthew Pearce	Environment Agency		29/11/2024

## 3. Agreed position

- 1.3 The summarised comments, officer response and agreed position is set out in the table below.
- 1.4 Boxes highlighted green are agreed positions, orange boxes are not yet agreed. Red text denotes possible modifications to text.

Plan ref	Full comment	Officer summarised comment	Support/Object	Officer Response and action	Environment Agency Position
Evidence Base	<p>We support the approach adopted in the SFRA Level 1 for assessing the risk in the council area and understanding the potential impact on the development and growth agenda. We support the council's approach to identify risk bands for consideration of the Sequential and Exception Test for assessing all sources of flooding as required under the updated National Planning Guidance. We have also agreed with the local approach to current and future functional floodplain.</p> <p>However, the document will need to be finalised and updated with relevant tidal modelling in order to appropriately support the Draft Local plan policies.</p>	<p>Support SFRA Level 1, approach to sequential/exception tests and functional floodplain . However, it needs to be finalised.</p>	<p>Support with changes</p>	<p>Support noted. SFRA Level 1 has since been completed and published (June 2024) ref TCC4d-f. No action required.</p>	<p>Noted – no further comments.</p>
S1	<p>We support this policy, in particular we support the reference to avoiding development in area of flood risk.</p>	<p>Support policy</p>	<p>Support</p>	<p>Support noted. No action required.</p>	<p>Noted</p>
C1	<p>We support the reference to avoiding development in area of flood risk (b.i) but the policy should not reference managing flood risk, as flooding is natural, and this indicates interventions in locations where there is risk, which is not the case across the whole of the Local Plan area. We would recommend that the wording is changed to;</p> <p>b. mitigate and adapt to the impacts of climate change by;</p> <p>i. reducing the impact of flood risk and ensuring people are safe by only allowing developments in the areas with the lowest flood risk from all sources of flooding;</p> <p>We also support refence to the coastal change and management requirements, and expect BCP Council Flood and Coastal Team to lead on this policy.</p>	<p>Policy should not reference managing flood risk, as areas at risk should be avoided and this indicates interventions in areas where they are not planned.</p>	<p>Support with changes</p>	<p>Agree.</p> <p>Action: Amend Policy C1 to read:</p> <p>Strategic Policy C1: Addressing Climate Change</p> <p>To address climate change, development needs to respond to the climate and ecological emergency and embed sustainability from the outset. In meeting the government's and our own net zero carbon emissions target, we expect development to:</p> <ol style="list-style-type: none"> <li>1. Reduce carbon emissions by: <ol style="list-style-type: none"> <li>a. reducing the need to travel by car by directing development to locations that are well served by cycling, walking, public transport and existing local services and facilities, or to locations where such facilities are capable of being improved;</li> <li>b. prioritising the reuse of structures and buildings, demolition materials, recycled materials and/or locally/sustainably sourced low carbon building materials;</li> <li>c. designing buildings to maximise energy efficiency and minimise energy consumption to ensure total regulated operational energy consumption is reduced;</li> <li>d. minimising the overall carbon footprint during construction by assessing the embodied energy in construction methods, transportation, plant, and materials;</li> <li>e. supporting the delivery of decentralised, community renewable energy schemes including heat networks, district heating schemes and cogeneration technology;</li> <li>f. taking opportunities to incorporate renewable energy use and low carbon energy generation;</li> <li>g. ensuring space is provided for charging infrastructure for electric vehicles;</li> <li>h. maximising opportunities for sustainable movement of freight, including rail freight, the use of electric vehicles and e-cargo bikes; and</li> <li>i. embracing technological and innovative advances in digitisation, connectivity, and communications to enable decarbonisation and transition to a net zero carbon future.</li> </ol> </li> </ol>	<p>Support changes</p>

Plan ref	Full comment	Officer summarised comment	Support/Object	Officer Response and action	Environment Agency Position
				<p>2. Mitigate and adapt to the impacts of climate change by:</p> <ul style="list-style-type: none"> <li>a. <del>reducing the impact managing of</del> flood risk <del>from all sources</del>, and ensuring people are safe by <del>directing only allowing</del> developments into the areas with the lowest flood risk from all sources of flooding;</li> <li>b. incorporating sustainable drainage within schemes to manage surface water, drainage and reduce the risk of flooding;</li> <li>c. ensuring any development in areas designated as either a Coastal Change Management Area or Coastal Vulnerability Zone is appropriate given the risks, and that any development is suitably designed and avoids drainage that would lead to increased risk of cliff slips;</li> <li>d. incorporating water efficiency and water recycling measures to reduce consumption of operational water usage;</li> <li>e. reducing the urban heat island effect through the use of building materials, trees, planting and green roofs to address potential site microclimate impacts; and</li> <li>f. achieving biodiversity net gain on each development site.</li> </ul> <p>3. Maximise carbon storage and sequestration by:</p> <ul style="list-style-type: none"> <li>a. Conserving <del>and or</del> enhancing existing habitats and enhancing the connectivity between habitats wherever possible; and</li> <li>b. integrating green infrastructure into the design of developments, including trees and urban greening.</li> </ul> <p>4. Increase low carbon and renewable energy projects by:</p> <ul style="list-style-type: none"> <li>a. encouraging development to provide renewable energy; and</li> </ul> <p>supporting low carbon and renewable energy projects where the scale and nature of development does not compromise the sensitivity of landscape and/or historic character.</p>	
C5	We support the reference to the coastal change and management requirements. We consider the policy to accord with the Shoreline Management Plan and the Flood and Coastal Risk Management Strategies, produced by the Council's Flood and Coastal Risk Management team. We would expect them to lead on the specific wording of this policy as the relevant coastal risk management Authority.	Support policy. Expect wording of policy to be led by Council's Flood and Coastal Risk Management team.	Support	Support noted. No action required.	Noted
Para 5.38-5.40	National Planning Guidance would indicate that when promoting development in flood risk areas a SFRA Level 2 should be undertaken to further assess the risk in those areas. We acknowledge that we have been working with the Council's Local Plan and Flood Risk teams to secure the necessary evidence to understand the flood risk for these locations. Whilst the SFRA Level 2 has not been completed and will not be complete until after the examination in public, we do require the council to complete this work to ensure that inappropriate development in areas of flood risk do not occur within the Local Plan period.	Environment Agency working with council to secure evidence to understand flood risk in these locations. While SFRA L2 will not be complete until after examination, Environment Agency require the SFRA L2 to be completed to ensure inappropriate development does not occur during plan period. Approach can work due to information in SFRA L1 and historic involvement of the flood and coastal risk management authorities over the last 15 years.	Support	Support noted. The Council will attempt to have a completed updated Poole SFRA L2 during the examination. No action required.	Support action.

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	<p>We consider this approach can work due to the information in the SFRA Level 1 and the historic involvement of the flood and coastal risk management authorities over the last 15 years.</p>				
<p>Para 5.40-5.44</p>	<p>We note, due to the scale of development and the geographical constraints within the Council area, that the plan is proposing sites identified within areas of current and future flood risk. The Sequential and Exception Test evidence dated March 2024, as supported by the SFRA Level 1, confirms that the council have assessed the current and future flood risk and in order to meet the demand, and these strategic sites required to meet the needs within the Local Plan period.</p> <p>We note sites in these areas are considered to meet the Sequential Test, focused around Poole Town and Christchurch Town. Whilst they meet the Sequential test, the document does confirm that there will need to be further flood risk assessment prior to determining planning applications on these sites, as part of the Exception Test. Whilst we have no objection to this approach we must highlight the outcome of the additional flood risk assessment, through Level 2 SFRA, and flood risk management strategies may determine that these sites cannot meet part 2 of the Exception Test. This is particularly important to note where there are potentially significant reliance on flood risk management infrastructure improvements that are not viable to make development (including safe access) safe for its lifetime.</p>	<p>Sites meet the sequential test and no issue with flood risk assessment being required at application stage as part of exception test. SFRA L2 and flood risk management strategies may determine it is not possible for these sites to meet part 2 of the exception test, particularly where flood risk management infrastructure improvements required to make development (including access) safe for its lifetime are not viable.</p>	<p>Support</p>	<p>Support and uncertainty regarding viability of funding strategies noted. No action required.</p>	<p>Noted</p>
<p>C6</p>	<p>In summary we consider the Draft Local Plan sound and legally compliant subject to:</p> <ul style="list-style-type: none"> <li>• the use of the Sequential Test and Exception Test, as defined in the supporting document TCC5;</li> <li>• the publishing of the finalised SFRA Level 1, including any relevant updates following outstanding tidal modelling;</li> <li>• the requirement for a SFRA Level 2 and associated infrastructure funding strategies, to be completed for areas where planned growth is known to be in areas at current and future increased risk of flooding, in line with stated timeframes (in Strategic Policy P15: Hamworthy, Strategic Policy P26: Poole Town) or prior to any planning applications being determined where stated (in Strategic Policy P10: Christchurch Town).</li> </ul>	<p>Plan is sound and legally compliant, subject to use of the Publication Draft Sequential Test and Exception Test; publication of finalised SFRA L1; and completion of SFRA L2 and associated infrastructure funding strategies for areas required in line with stated timeframes/prior to applications being determined in areas restricted.</p>	<p>Support</p>	<p>Support of the proposed approach noted. No action required.</p>	<p>Noted</p>

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Para 5.33-5.37	<p>We have been working with the Council's Local Plan and Flood Risk teams to secure the necessary evidence to understand the flood risk for development and growth in the Local Plan. The approach agreed reflects the historic development and growth agendas for Christchurch and Poole that we have been in dialogues since 2009. In earlier version of the local plan consultation and draft policies we had been working with the council to be more proactive with certain types of development that are already at flood risk and situated with in certain vulnerability classification. The previous wording was linked to the council supporting any application for highly vulnerable development that is at risk of flooding that is looking to secure a more suitable location at lower risk of flooding. We acknowledge that flood risk policy would not take planning precedence over any other policy but could be used to support the relocation of existing development that is unsustainable. We would therefore request that this is included in the supporting text and preferably with in 'Policy C6:Flood Risk' itself.</p>	<p>Have worked with council to secure necessary evidence. Agreed approach reflects historic development and growth in Christchurch and Poole that we have been in dialogues since 2009. Previously worked with council to take proactive approach by supporting the relocation of highly vulnerable development at risk of flooding to lower risk areas - flood risk policy should support this. This should be included in supporting text and preferably Policy C6.</p>	Support with changes	<p>Agree that text regarding the council supporting the relocation of highly vulnerable into areas at lower risk of flooding should be included in the plan.</p> <p>Action: amend para 5.37 to read: 5.37 <u>The BCP area contains some highly vulnerable development that is at risk of flooding. The council will therefore work with applicants seeking to relocate existing highly vulnerable development from locations that are at risk of flooding to more suitable locations at lower risk of flooding. Furthermore, over time, and in future local plans,</u> in the face of ongoing climate change and in accordance with national guidance on flood risk, it will be necessary to consider whether existing development in certain locations will continue to be sustainable in the long term and the potential need for relocation of existing development and habitats. <u>This will be considered over time and in future local plans.</u></p>	Support changes
C6	<p>Part 1 We are satisfied that this part of the policy meets the requirements set out in the National Planning Policy and guidance as to where the development should be located. We question whether this should reference the Exception Test in the title as this text does not adequately deal with all elements of the Exception Test. Part 2bi We suggest that the wording of this should reflect the need for development to be safe rather than just reference resistant and resiliency measures, which only deal with part of the flood risk development criteria. Therefore, we would advise this to be changed. Part 3f We consider that whilst this does correctly refer to development being safe for its lifetime, it should include the reference to 'including unaided access/egress'.</p>	<p>Policy is sound. However reference to exception test in title of Part 1 should be removed. Part 2bi should reflect need for development to be safe rather than just referencing resistant and resiliency measures. Part 3f - Reference to development being made safe for its lifetime should include unaided access/egress.</p>	Support with changes	<p>This part of the policy addresses the exception test (i.e. it states "The sequential test and exception test will be applied to planning applications in accordance with national policy, the SFRA Level 1, and our flood risk guidance note". Therefore do not view that reference to the exception test should be removed from title. Agree, reference to the need to ensure development is safe to be included. Agree reference to the need for safe access/egress to be made safe for its lifetime would be beneficial.</p> <p>Action: Amend Policy C6 to read:</p> <p>Policy C6: Flood Risk</p> <p>1. Sequential Test and Exception Test</p> <p>The sequential test and exception test will be applied to planning applications in accordance with national policy, the SFRA Level 1, and our flood risk guidance note.</p> <p>The sequential test will not be required or will be passed if any of the following instances apply:</p> <ol style="list-style-type: none"> <li>the site is located entirely within Flood Risk Areas where the sequential test is passed for the type of development proposed in accordance with Figure 5.5;</li> <li>the development is exempt from the sequential test, as set out in national policy;</li> <li>the site is within the Christchurch Sequential Test Area or the Poole Sequential Test Area as defined on the Policies Map;</li> <li>the development is a replacement dwelling where a sequential approach is taken within the site and appropriate measures to improve flood resilience and resistance are incorporated; or</li> </ol>	Support changes

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				<p>e. a sequential approach has been taken to the layout of the proposal, so that each type of development proposed is located entirely within Flood Risk Areas where the sequential test is passed for that type of development in accordance with Figure 5.5.</p> <p>2. Flood Risk Management &amp; Mitigation</p> <p>a. For development proposed in our Low-Medium, Medium, High or Very High Flood Risk Areas as set out in the BCP SFRA Level 1, or where further evidence of flooding is demonstrated, a site-specific flood risk assessment will be required.</p> <p>b. For proposals where the sequential test has been passed or is not needed, the site-specific flood risk assessment will need to demonstrate that the proposed development will:</p> <ul style="list-style-type: none"> <li>i. incorporate any necessary site-specific flood measures appropriate to the character and biodiversity of the area, to ensure the development is <b>safe, and</b> appropriately flood resistant and resilient;</li> <li>ii. not increase flooding elsewhere; and</li> <li>iii. maximise opportunities to reduce overall flood risk.</li> </ul> <p>c. Where flood risk cannot be adequately mitigated on site, including unaided access and egress to the site, a flood management strategy and delivery plan will need to be agreed with the council before planning permission can be granted. This will need to identify:</p> <ul style="list-style-type: none"> <li>i. measures required to reduce flood risk and surface water run-off at the site for the duration of its design life, making it safe (including unaided access/egress during flood events) and ensuring that flood risk does not increase elsewhere as a result;</li> <li>ii. the level and source of funding required for such measures;</li> <li>iii. a legal framework which demonstrates how the measures can be lawfully and successfully delivered; and</li> <li>iv. a realistic and achievable timetable for implementation allowing sufficient time to ensure prevention of flooding to protect the development against the effects of climate change.</li> </ul> <p>d. The council will publish updated SFRA Level 2 studies for Poole and for Christchurch, which will inform the applicants' flood risk assessments.</p> <p>e. <b>The council will work with applicants seeking to relocate existing highly vulnerable development that is at risk of flooding to a more suitable location at lower risk of flooding.</b></p> <p>3. Flood Defences</p> <p>a. Proposals for flood management infrastructure will be supported which:</p> <ul style="list-style-type: none"> <li>i. accord with an agreed FCERM strategy; or</li> <li>ii. are accepted by the Environment Agency and the Council.</li> </ul> <p>b. Development will not be permitted where it would adversely impact on the future maintenance, upgrading or replacement of flood management infrastructure.</p> <p>c. Where applicants propose to alter or work on existing flood mitigation infrastructure, they must:</p>	



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				<p>i. do so in accordance with the relevant flood risk management authority's requirements; and</p> <p>ii. demonstrate that the works can be achieved lawfully.</p> <p>d. Where applicants propose to deliver their own defences, the applicant must demonstrate how the defences meet the council's requirements regarding:</p> <ul style="list-style-type: none"> <li>i. standard of protection;</li> <li>ii. construction specification;</li> <li>iii. appearance;</li> <li>iv. amenity and accessibility;</li> <li>v. demonstration of how their proposals will connect to future and existing infrastructure maintenance for the life of the development; and</li> <li>vi. compatibility with wider flood defences or drainage improvement schemes.</li> </ul> <p>e. Where the SFRA level 1 identifies land that needs safeguarding for future Flood Risk Management infrastructure, upgraded or maintenance, this should be left free from development that might compromise delivery of future defences.</p> <p>f. Where defences are required to ensure a development is safe for its lifetime (<b>including unaided access and egress</b>), the council will assess the likelihood of delivery and subsequent future maintenance of the defences. Where there is no certainty that defences will be delivered and maintained during the lifetime of the development, applications should be refused.</p> <p>g. Where proposals at tidal risk (including replacement development) rely on defences outlined in an agreed FCERM strategy (having passed or not requiring the sequential test); and come forward before commencement or completion of these measures, applicants will need to either:</p> <ul style="list-style-type: none"> <li>i. provide their own flood defence(s), which demonstrate how the development (including access &amp; egress) can be made safe and defended for its lifetime, and how the site and its inhabitants will be managed in an emergency; or</li> <li>ii. if supported by the Environment Agency, propose sufficient flood mitigation measures to deal with present day flood risk and provide an equivalent financial contribution towards future defences on which the site will rely; or</li> </ul> <p>propose a combination of the above.</p>	
Para 6.18 – 6.21		Suggest revisions to text regarding nutrients	Support with changes	<p>The government announcement on 24 May 2024 and subsequent letter from Natural England confirmed that development will not be required to provide phosphorous mitigation in Poole Harbour. Para 6.19 will be amended.</p> <p>Action: Para 6.19 to read:</p> <p>The Levelling Up and Regeneration Act (November 2023) introduced a legal requirement for certain wastewater treatment works to be upgraded to achieve the nutrient pollution standard. Secondary legislation in <b>April May 2024</b> <del>will</del>-named the specific wastewater treatment works. <b>Natural England subsequently confirmed it is expected</b> that sufficient wastewater treatment works within the Poole Harbour catchment will be</p>	Support changes



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				named undergo the necessary works to achieve a threshold level, thereby removing the need for development specific phosphorus mitigation from 2030. <del>Once this is agreed</del> Natural England has advised that we do not need to consider phosphorous measures in the period to 2030, as <del>he</del> the adverse effect will be insignificant.	
NE6	We support that the plan acknowledges the importance of the Stour for flood risk management purposes and that there may be local opportunities to enhance the connectivity of the floodplain to its river.	Support policy	Support	Support noted. No action required.	Noted
Para 8.73	We support that the supporting text in 8.73 appropriately refers to the flood risk sequential and exception test for this type of development.	Support supporting text	Support	Support noted. No action required.	Noted
E3	We support that the policy identifies for the business park that flood risk is a potential constraint on the site, and one that will need to be resolved through the Sequential Approach and site-specific flood risk management strategy.	Support policy's required approach to flood risk on site.	Support	Support noted. No action required.	Noted
E6	We support that this policy highlights the importance to tie in with the broader flood risk management work that BCP Council flood risk team are leading on. The water compatible nature of the operation of a Port mean that this matter will need to be carefully considered at all stages.	Support policy. Water compatible nature of port operation means broader flood risk management work will need to be considered at all stages.	Support	Support noted. No action required.	Noted
P2	Please note that the land safeguarded for a cemetery is a former landfill. Therefore these sites would require regulatory input and potentially require remediation.	Former landfill. Regulatory input required and potentially remediation.	Comment	Regulatory input would take place outside of the local plan. No action required.	Noted – no further comments
BG.1	We note that the Sequential and Exception Test document (TCC5) confirms that there is flooding risk on Land South of Burton (BG.1). Given the extent of this future flood risk to the site, it may impact on whether the site can accommodate the scale of development proposed by just building in the low risk areas. We note part a. xiii. states that any development proposals must “be informed by modelling that demonstrates development can be sequentially located within the site”. We recommend this is amended to make reference to specifically being located in areas at low risk of fluvial and tidal flood risk.	Extent of flood risk may impact ability to accommodate scale of development proposed by buildings only in low risk areas. Requirements should be altered to ensure development is only located in areas at low risk of fluvial and tidal flooding.	Support with changes	Work is ongoing to understand flood risk and mitigation is considered possible. BCP Council to follow up with FCERM.	We note the council's position to “support with changes” in response to our comments and that “mitigation is considered possible”, However as stated this work is ongoing and a change has not yet been agreed. We maintain our position, that in the absence of detailed modelling, we recommend that the <i>Strategic Policy P7: Burton and</i>

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					<p><i>Grange, 4 a. Land south of Burton (BG.1)</i> is amended to make reference to development specifically being located only in areas at 'low risk' of fluvial and tidal flooding, to be demonstrated through detailed modelling. It should be noted in the plan this <u>may</u> impact on the ability to accommodate the scale of development proposed at this location. This is an important point to include to ensure sustainable development for this allocation and that any future applicants or developers are aware of the requirements for this site.</p>
BG.2	We support that Roeshot Hill (BG.2) identifies the fluvial flood risk on the site and the need to manage risk associate with it.	Support policy approach to flood risk at BG.2.	Support	Support noted. No action required.	Noted
P10	<p>We note, due to the scale of development and the geographical constraints within the Council area, that the plan is proposing sites identified within areas of current and future flood risk. The Sequential and Exception Test evidence dated March 2024, as supported by the SFRA Level 1, confirms that the council have assessed the current and future flood risk and in order to meet the demand, and these strategic sites required to meet the needs within the Local Plan period.</p> <p>We note sites in these areas are considered to meet the Sequential Test, focused around Poole Town and Christchurch Town. Whilst they meet the Sequential test, the document does confirm that there will need to be further flood risk assessment prior to determining planning applications on these sites, as part of</p>	Sites meet the sequential test and no issue with flood risk assessment being required at application stage as part of exception test. SFRA L2 and flood risk management strategies may determine it is not possible for these sites to meet part 2 of the exception test, particularly where flood risk management infrastructure improvements required to make development (including access) safe for its lifetime are not viable.	Support	Support and uncertainty regarding viability of funding strategies noted. No action required.	Support noted

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	the Exception Test. Whilst we have no objection to this approach we must highlight the outcome of the additional flood risk assessment, through Level 2 SFRA, and flood risk management strategies may determine that these sites cannot meet part 2 of the Exception Test. This is particularly important to note where there are potentially significant reliance on flood risk management infrastructure improvements that are not viable to make development (including safe access) safe for its lifetime.				
P10	<p>The section on flood risk in this document appropriately represents the flood risk position and the uncertainties around delivering flood defences, which new development would be reliant on to make it safe.</p> <p>We support the text in the policy that prevents the development coming forward until the strategic flood risk matters have been fully resolved. This accords with the principles in the National Planning Policy and its associated guidance and allows the plan to remain compliant with policy prior to the production of a SFRA level 2 and associated infrastructure funding strategy.</p>	<p>Appropriately represents flood risk position and uncertainties around delivering flood defences. Support policy preventing development coming forward until strategic flood risk matters resolved. Policy is sound.</p>	Support	Support noted. No action required.	Noted
CT.4	<p>Due to the work on the council's flood risk management strategies for the coastal environment we are aware of the impacts of climate change and specifically the challenges around infrastructure delivery within the current governments funding model. This is known to be a particular challenge in the Christchurch town area, especially as there are multiple sources of flooding (fluvial, tidal and surface water). Therefore, we consider that it is appropriate that the council deliver the SFRA Level 2 and an agreed funding strategy, prior to determining applications in the agreed regeneration areas set out in the Sequential and Exception test evidence.</p>	<p>Given challenges around infrastructure delivery in Christchurch, it is appropriate for SFRA L2 and agreed funding strategy to be delivered prior to determining application in the regeneration areas.</p>	Support	Support noted. No action required.	Noted
CT.5	<p>Due to the work on the council's flood risk management strategies for the coastal environment we are aware of the impacts of climate change and specifically the challenges around infrastructure delivery within the current governments funding model. This is known to be a particular challenge in the Christchurch town area, especially as there are multiple sources of flooding (fluvial, tidal and surface water). Therefore, we consider that it is appropriate that the council deliver the SFRA Level 2 and an agreed funding strategy,</p>	<p>Given challenges around infrastructure delivery in Christchurch, it is appropriate for SFRA L2 and agreed funding strategy to be delivered prior to determining application in the regeneration areas.</p>	Support	Support noted. No action required.	Noted

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	prior to determining applications in the agreed regeneration areas set out in the Sequential and Exception test evidence.				
P11	Sites for future opportunities appear to sit just outside of future flood zone.	Sites appear to be just outside future flood zone.	Comment	Comment noted. No action required.	Noted
P15	<p>We note, due to the scale of development and the geographical constraints within the Council area, that the plan is proposing sites identified within areas of current and future flood risk. The Sequential and Exception Test evidence dated March 2024, as supported by the SFRA Level 1, confirms that the council have assessed the current and future flood risk and in order to meet the demand, and these strategic sites required to meet the needs within the Local Plan period.</p> <p>We note sites in these areas are considered to meet the Sequential Test, focused around Poole Town and Christchurch Town. Whilst they meet the Sequential test, the document does confirm that there will need to be further flood risk assessment prior to determining planning applications on these sites, as part of the Exception Test. Whilst we have no objection to this approach we must highlight the outcome of the additional flood risk assessment, through Level 2 SFRA, and flood risk management strategies may determine that these sites cannot meet part 2 of the Exception Test. This is particularly important to note where there are potentially significant reliance on flood risk management infrastructure improvements that are not viable to make development (including safe access) safe for its lifetime.</p>	Sites meet the sequential test and no issue with flood risk assessment being required at application stage as part of exception test. SFRA L2 and flood risk management strategies may determine it is not possible for these sites to meet part 2 of the exception test, particularly where flood risk management infrastructure improvements required to make development (including access) safe for its lifetime are not viable.	Support	Support and uncertainty regarding viability of funding strategies noted. No action required.	Support noted.
P15	We support that the council are updating their SFRA Level 2 to further consider the flood risk and required interventions to make this development safe for its lifetime. The delivery of the SFRA Level 2 is essential in understanding current and future flood risk and likely interventions required to make development safe. Therefore, for any site that cannot currently manage the whole of the risk, including access, as there is a reliance on strategic infrastructure, it is appropriate that the SFRA level 2 will need to be in place prior to the determination of any applications in this area. This work may also highlight that financial contributions may be required to secure the long term improvements that may be required.	Support update to SFRA L2, required to understand flood risk now and in future alongside and required interventions. SFRA L2 needs to be in place prior to determination of any applications that cannot manage whole of the risk, including access. Financial contributions may be required to secure any require long term improvements.	Support	Support noted. No action required.	Noted

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P.1	We support that the former Poole Civic Office (P.1) identifies the future tidal flood risk on the site and the need to manage risk associate with it through the SFRA Level 2 and site specific FRA.	Support policy approach to flood risk at P.1.	Support	Support noted. No action required.	Noted
PH.1	We support that the Penn Hill Policy identifies the future tidal flood risk on the site at Salterns Marina (PH.1). We support the need to manage risk associate with it through the SFRA Level 2 and the delivery of strategic flood defences.	Support policy approach to flood risk at PH.1.	Support	Support noted. No action required.	Noted
P26	<p>We note, due to the scale of development and the geographical constraints within the Council area, that the plan is proposing sites identified within areas of current and future flood risk. The Sequential and Exception Test evidence dated March 2024, as supported by the SFRA Level 1, confirms that the council have assessed the current and future flood risk and in order to meet the demand, and these strategic sites required to meet the needs within the Local Plan period.</p> <p>We note sites in these areas are considered to meet the Sequential Test, focused around Poole Town and Christchurch Town. Whilst they meet the Sequential test, the document does confirm that there will need to be further flood risk assessment prior to determining planning applications on these sites, as part of the Exception Test. Whilst we have no objection to this approach we must highlight the outcome of the additional flood risk assessment, through Level 2 SFRA, and flood risk management strategies may determine that these sites cannot meet part 2 of the Exception Test. This is particularly important to note where there are potentially significant reliance on flood risk management infrastructure improvements that are not viable to make development (including safe access) safe for its lifetime.</p> <p>Due to the work on the council's flood risk management strategies for the coastal environment and business case development for the West Quay Road area of Poole we are aware of the impacts of climate change and specifically the challenges around infrastructure delivery. Within Poole Town Centre there is an agreed way forward that changes from earlier local plan strategies which were developer lead infrastructure delivery. This new approach is for the council, where government funding model allows, to deliver defences that protect the existing</p>	Support approach to flood risk. Approach agreed with the Environment Agency regarding Poole Town Centre is for delivery of defences that protect the community and reduce risk to sites where government funding allows. Approach to SFRA L2 completion within 12 months of adoption allows uncertainty to be further explored, while areas with greater certainty can be regenerated. Sites meet the sequential test and no issue with flood risk assessment being required at application stage as part of exception test. SFRA L2 and flood risk management strategies may determine it is not possible for these sites to meet part 2 of the exception test, particularly where flood risk management infrastructure improvements required to make development (including access) safe for its lifetime are not viable.	Support	Support and uncertainty regarding viability of funding strategies noted. No action required.	Support noted.

Plan ref	Full comment	Officer summarised comment	Support/Object	Officer Response and action	Environment Agency Position
	<p>community and reduce the risk to the development sites.</p> <p>We would normally expect the council to have completed the SFRA Level 2 prior to the examination but note that they are committing to completing this with a short period after adoption (specifically within 12 months). This approach allows the uncertainty around the different parts of Poole, where there are different standards of protection, to be further explored whilst the areas that have greater certainty can support the regeneration aspirations of the council.</p> <p>We support that Poole Town Policy identifies the future tidal flood risk on the site and the need to manage risk associate with it through the SFRA Level 2 and site-specific FRA.</p>				