
7. Conclusions and Recommendations

7.1 Flood Risk in Bracknell Forest Borough

The key objective of the Bracknell Forest SFRA is to inform the Local Development Framework with respect to local flood risk issues and the location of future development in Bracknell Forest Borough. Based on a number of key factors, including the history of flooding in the Borough and specific development needs together with the potential development areas identified, a tailored approach to SFRA has been developed to best meet this objective.

In line with the general approach of all SFRAs, a sequential, risk-based approach to assessing development and flood risk was undertaken, in line with the guidance outlined in the consultation draft of PPS 25 *Development and Flood Risk* (based on its predecessor PPG 25). The overriding aim of the PPS 25 Sequential Test is to steer all new development to areas of lowest flood risk. This requires both an understanding of potential flood risks in Bracknell Forest Borough together with an assessment of the specific risks posed to potential development areas on a local scale.

Flood risk was characterised throughout the Borough based on a range of information sources. The risks associated with primary fluvial flooding were predominantly based on the Environment Agency's flood zones and historic flooding records. However, these do not take into account flooding from minor watercourses or other secondary sources of flooding.

In general the risk of flooding is low, in comparison with neighbouring boroughs. However, this should not reduce the importance of flood risk in the planning process. The impact of climate change on fluvial flooding and rainfall runoff should be a high priority in development planning.

The definition given in the maps of functional floodplain are only indicative and may not fully encompass all the functional floodplain or may include more land than is necessary. A Flood Risk Assessment for development on land in Zone 3 should define the extent of the functional floodplain, in consultation with the Agency, and categorise the land use appropriately.

7.2 Application to the Planning Process

The transition from the Bracknell Forest Local Plan to the Local Development Framework following the Planning and Compulsory Purchase Act 2004 provides an ideal opportunity for the Council to review and update its policies on flood risk, and to ensure consistency with national guidance and regional planning policy. The development of policies on flood risk should embrace the concept of 'balanced management', facilitating development which serves the social and economic needs of the community whilst controlling flood risk and ensuring it is properly managed and mitigated.

Highlighted by recent flood events in the Borough, it is essential for the Council to develop clear and robust policies related to flood risk management. These will need to be readily understood by applicants and development control staff with regard to the preparation and determination of planning applications. PPS 25 will be the principal reference point in this

process. The interaction of PPS 25 with other Planning Policy Guidance and Statements is acknowledged, particularly in relation to PPG 3 *Housing* where there is scope to combine the sequential test for flood risk with reviews of urban capacity and housing land allocations.

Model policy for the emerging LDF is suggested in Section 7.4 however there may also be a need for a model Supplementary Planning Statement suitable for inclusion in Bracknell Forest's Local Development Documents.

7.3 Application to Development Control

It is important that Bracknell Forest Borough Council is fully informed in relation to the assessment of development and flood risk in order that it may liaise with other responsible authorities (e.g. the Environment Agency and Thames Water) on the basis of equality. The Sequential Test outlined in PPS 25 must be at the centre of spatial planning and development control decisions related to flooding, with sites prioritised for development in ascending order from Zone 1 to Zone 3. A further sequential approach should then be applied to other secondary sources of flood risk.

A Strategic Flood Risk Assessment (SFRA) is a strategic exercise providing an assessment over a wide area. It therefore does not preclude the need for local, site-specific flood risk assessments (FRAs) as part of the application process for particular developments. However, the broad-scale assessment of risks to potential development areas presented in the Bracknell Forest SFRA should be used to guide and focus subsequent FRAs of sites selected for development.

Applicants should be encouraged to identify and implement flood mitigation and management measures in a way that reduces risks in a sustainable manner, observing good standards of urban design and finding 'green' solutions which enhance recreation and amenity, and avoid damage to local ecology. In the short term, planning conditions should be used to improve flood resilience of buildings where risks exist. In the longer term, the Building Regulations should be amended at national level to regulate flood resilience of buildings. The Environment Agency's standard planning conditions on flood risk are a useful aid to development control officers.

7.4 Draft Policies for Local Development Documents

Some suggestions are set out below, which may form the basis of draft policies for Local Development Documents. Clearly, these may need modification and tailoring to local circumstances and may need to be summarised in order to achieve the right balance alongside other planning policies. Greater detail can be provided within a Supplementary Planning Document.

The Council will employ the principle of 'balanced management' in relation to flood risk, allowing development which serves the social and economic needs of the community to proceed whilst ensuring that flood risk is properly managed and mitigated, subject to the overriding principle that the Council will not normally permit development which places people or property at direct risk from flooding or displaces this risk into other areas.

The Council will therefore have regard to PPS 25 Development and Flood Risk and to the most recent Strategic Flood Risk Assessment for Bracknell Forest Borough in assessing the suitability of land for development. It will apply the sequential test set out in Appendix D of PPS 25 in allocating sites for development on the proposals map and in determining applications for planning permission.

The Proposals Map will show all areas subject to flood risk, based on information supplied by the Environment Agency. Development in the higher flood risk zones (Zones 2 and 3) will be subject to the constraints of land use vulnerability, and satisfaction of the Exception Test criteria. All development in these zones, as well as major development in areas of low flood risk (Zone 1) will be required to be accompanied by a Local Flood Risk Assessment which will be a material consideration in the determination of planning applications. This assessment will need to include a consideration of other secondary sources of flooding and residual flood risk where applicable. It will also need to assess the vulnerability to flooding over the lifetime of the development and the potential for the development to increase flood risk elsewhere. Depending on the outcome of the Local Flood Risk Assessment, the Council may require flood protection and mitigation measures to be included in developments that may be on- or off-site. In such cases, planning permission may be granted subject to appropriate planning conditions or planning obligations.

The Council will require mitigating measures accompanying development proposals to be subject to a sustainability appraisal. There will be a presumption in favour of measures that employ good standards of urban design and high flood resilience; enhance local recreation and amenity; protect ecology; safeguard water resources and utilise sustainable urban drainage systems. Unsustainable solutions such as the culverting of watercourses will be resisted and other engineered solutions will be scrutinised in order to determine whether a more environmentally sustainable alternative may be more appropriate.

7.5 Future Recommendations

7.5.1 Updates to the SFRA

The results of the SFRA should be used to inform the Local Development Framework. Provisions should be made for updating the SFRA outputs on a regular basis with the latest available information and in any case before the LDFs are due for revision. Due to the emergence of the new PPS 25 to replace PPG 25, it may be necessary to amend and update the SFRA in line with any changes to the current consultation draft.

It is also proposed that the SFRA outputs should be revised in light of the latest available information within 3 years of its publication. New data on flood risk should be available for the Blackwater in 2007 and The Cut is timetabled for a Strategic Flood Risk Mapping (SFRM) Project to commence within the next year, outputs from this should be available in 2008.

7.5.2 Guidance for Developers

To complement the findings and recommendations of the Bracknell Forest SFRA with respect to development and flood risk in Bracknell Forest borough, it is recommended that a set of guidance notes be produced setting out the requirements for both private and commercial developers. This could comprise documentation, leaflets and flow charts covering the correct procedure(s) for the various types of application in relation to flood risk, including:

- Production of preliminary or Stage 1 FRAs;
- Production of detailed or Stage 2 FRAs;
- Assessment of surface water runoff from large and small developments;
- Use of SuDS and long term maintenances;

- Assessment of historic flows off brownfield sites;
- Monitoring of post development runoff;
- Strategic solutions to flood risk;
- Culverting policy and environmental gain.