



Stockton on Tees Borough Local Plan, Statement of Common Ground

Local Plan Policies and Strategic Flood Risk Assessment

This is a Statement of Common Ground produced and agreed by the following parties:

Environment Agency

Stockton on Tees Borough Council

This statement has been signed on behalf of the above parties by the following representatives:

Eddie Halstead – Sustainable Places Team Leader - North East Area (Environment Agency)

Signature: 

Date: 18/05/2018

Richard McGuckin – Director of Economic Growth and Development (Stockton on Tees Borough Council)

Signature: 

Date: 18.05.18

1 Introduction

Purpose of the Statement of Common Ground

- 1.1 This Statement of Common Ground has been produced and agreed by the Environment Agency and Stockton-on-Tees Borough Council.
- 1.2 It is intended that this statement will assist all parties during the examination of the Stockton on Tees Local Plan as it provides a simple statement regarding both parties positions in relation to matters raised within the Environment Agency's representations to the Publication Draft Local Plan (Regulation 19). Comments principally relate to the Councils evidence base in the form of the Strategic Flood Risk Assessment, and Sequential and Exceptions tests.

Background

- 1.3 Stockton on Tees Borough Council has a long history of positive engagement with the Environment Agency. The Council has involved the Environment Agency in the development of the Local Plan. A duty to cooperate meeting was held during the Regulation 18 consultation which informed the Environment Agencies response.
- 1.4 During this meeting it was agreed that the Council would update its Strategic Flood Risk Assessment (SFRA). The Environment Agency has been involved throughout this process from preparation of the brief for the study, agreeing the extent of functional floodplain and to reviewing the Level 1 and 2 reports.
- 1.5 The response to the Regulation 18 consultation was generally supportive of the strategy and policies in the emerging Local Plan. However, the response sought a number of amendments to the plan and confirmed the need for a new SFRA which would assess specific sites which are identified as being at flood risk. Where appropriate amendments have been made to the Local Plan to reflect comments made by the Environment Agency.
- 1.6 During the Regulation 19 consultation the Environment Agency considered that the Local Plan was 'unsound on the basis that it is not informed by a Sequential and Exception Test and up to date evidence base in the form of a SFRA'. However, the response to the consultation recognised that the SFRA was still under preparation and that there was on-going and meaningful engagement. This stated:

"We are in support of an update to the SFRA and any policy revisions, which the council are currently undertaking. We are working closely with the council on their SFRA and wish to be kept informed of future progress of this evidence base.

We would be happy to assist the council, where possible, to review any documents / information when they become available. This information will hopefully contribute to resolving the concerns detailed above and subsequently be included in the local plan prior to its consideration at examination.

We acknowledge that a lot of our other recommendations from the draft local plan consultation have been taken on board at the publication stage. Notwithstanding the above,

there some strong policies which reflect the collaborative work with the Environment Agency and Stockton Borough Council in trying to achieve positive environmental benefits.'

- 1.7 Beyond this the Environment Agency also made a number of comments on policies in relation to flood risk, biodiversity and the Tees Estuary Partnership.
- 1.8 At the time of submission the Council was working to finalise the Strategic Flood Risk Assessment. Subsequent to submission, the Council have worked with the Environment Agency to complete the SFRA and reach the position on policy matters detailed within this SOCG.

Key Issues Summary

- 1.9 The Council consulted the Environment Agency throughout the production of the Submitted Local Plan. The following is a summarised list of the key issues raised during the consultation and subject to further dialogue through the production of this statement:
 - Housing and employment allocations not supported by an up to date SFRA, and Sequential and Exception Tests
 - Reducing and mitigating flood risk (ENV4)
 - Preserve, protect and enhance biodiversity and geodiversity (ENV5)
 - Tees Estuary Partnership
- 1.10 The remaining sections of this document discuss the above points in detail before concluding whether there is agreement or disagreement on these matters.

2 SFRA Level 1

The Issues

2.1 At the time of submission the SFRA Level 1 was not complete and its acceptability had not been formally agreed with the Environment Agency. Whilst at submission there was general agreement regarding the acceptability of the SFRA Level 1 between the parties there were a number of outstanding matters. These can be summarised as follows:

- Access to Seal Sands and North Tees.
- Bowesfield
- Acceptability of the SFRA Level 1

Issue 1- Seal Sands and North Tees

2.2 The employment allocations at this location are identified within policy EG4 as being for hazardous installations, uses related to the process industries and emerging specialist sectors. The allocations are surrounded by flood zones which presents an emergency access and egress issue during tidal events should water blocking access routes stay for a long period. Fortunately, the employment allocations are on higher ground and not at significant risk of flooding (predominantly within flood zone 1) meaning that people working at these sites will be able to stay within the flood free area until water subsides.

2.3 The Council acknowledge the emergency access and egress issues at this location and have identified within the Level 1 SFRA that this can be dealt with at the planning application stage as any development proposals will require an FRA including appraisal of access issues. Through any FRA a developer will need to consider emergency access but any development could potentially be planned for evacuation and automation of processes.

2.4 An alternative solution to this would be the raising the primary access routes to the site above climate change flood levels or providing an alternative emergency access/egress. At the present time there are no cost estimates or formal proposals for any such schemes which it is anticipated will be extremely expensive to deliver. Whilst the Council are content that this matter can be dealt with at planning application stage and there is not a necessity to raise the primary access routes the Environment Agency have identified that this should be an aspiration and funding sought where possible. Owing to the above the Council are suggesting the following text be incorporated into the justification to **policy EG4** as a proposed modification:

“Access to the Seal Sands and North Tees is at risk from flooding and this presents an emergency access and egress issue. Any development proposals at this location will need to address emergency access within any site specific flood risk assessment. As a long term solution to this matter the Council have an aspiration to raise primary access routes or provide alternative emergency access/egress. Funding for such proposals will be considered.”

Common Ground

2.5 The suggested amendments proposed address Environment Agency comments.

Issue 3- Acceptability of the SFRA Level 1

2.6 Further to issues 1 and 2 above and earlier discussions the Environment Agency consider the report acceptable and that it has informed Local Plan preparation.

Common Ground

2.7 **The SFRA Level 1 is acceptable and that it has informed Local Plan preparation.**

3 SFRA Level 2 and Sequential/Exception Tests

The Issues

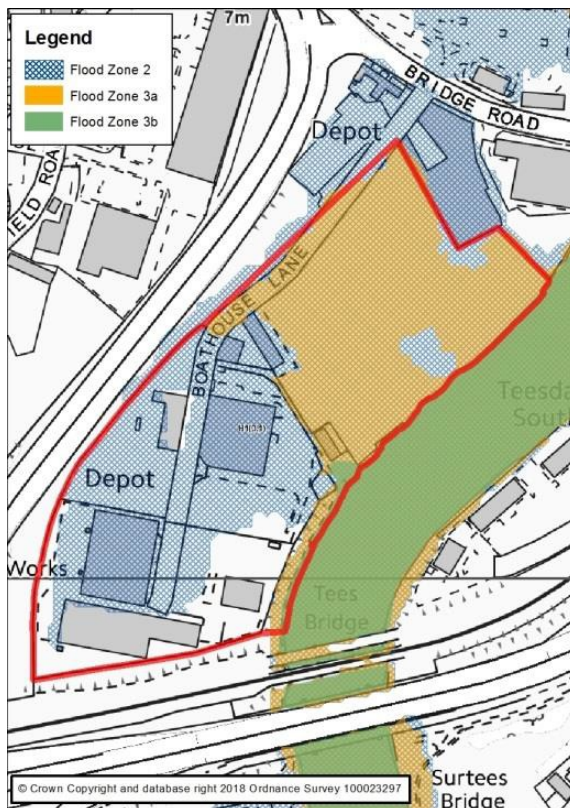
- 3.1 At the time of submission the SFRA Level 2 was not complete and its acceptability had not been formally agreed with the Environment Agency. Three sites were taken forward for consideration within the Level 2 assessment; these being Tees Marshalling Yard, Boathouse Lane and Billingham Riverside. However, it is only the Boathouse Lane and Billingham Riverside sites which required the exception test. Tees Marshalling Yard was only included in within Level 2 in order to enhance the available understanding of flood risk and development issues.
- 3.2 In response to the Regulation 19 consultation the Environment Agency identified the plan 'unsound' on the basis that it was not informed by a Sequential and Exception Test and up to date evidence base. However, the response to the consultation recognised that the SFRA was still under preparation and that there was on-going and meaningful engagement.
- 3.3 At submission it is acknowledged that the Environment Agency had concerns with regards to the allocation of the Boathouse Lane housing allocation and that further discussion was required with regards to the Billingham Riverside employment.
- 3.4 Subsequent to submission the Council have worked alongside the Environment Agency to complete the SFRA and have updated the sequential and tests based on the completed SFRA. The updated sequential and exception tests have been shared with the Environment Agency.
- 3.5 The following identifies the main issues discussed between the parties:
- Boathouse Lane
 - Billingham Riverside
 - Acceptability of the SFRA Level 2 and the sequential/exception tests.

Issue 1- Boathouse Lane

3.6 Policy SD3 identifies Boathouse Lane as a key regeneration site located within the Regenerated River Tees Corridor. The site is allocated within policy H1 for approximately 350 dwellings. The site is identified as being within the following flood risk zones:

Site Name	Site Area (Ha)	Flood Map for planning (%)			
		FZ1	FZ2	FZ3a	FZ3b
Boathouse Lane	7.17	16.89	42.22	37.54	3.35

- 3.7 As detailed below the areas at greatest risk of flooding are located to the north of the site. Associated flood risk has led to the site being taken forward for detailed consideration within the Level 2 SFRA.



- 3.8 Detailed modelling at the Boathouse Lane site to inform the SFRA level 2 has been undertaken. This modelling has focussed on options for ground raising and lowering; this has demonstrated development at this location would be difficult to address in flood risk terms as the extent of ground raising would be costly and the developable area would likely be significantly reduced. In addition further modelling would be required to demonstrate that a specific development layout could be achieved on the site for the Environment Agency to be supportive. On this basis the Council are unable to identify the site as developable at this time and are suggesting via a modification that it be removed as a housing allocation.
- 3.9 Both parties acknowledge that the site is key regeneration aspiration for the local authority and have agreed to continue working cooperatively to investigate options for the successful regeneration of this site in the future.

Common Ground

- 3.10 It is appropriate, based on the information available at this time, for allocation at Boathouse Lane to be removed from the Local Plan.**

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Issue 2- Billingham Riverside

- 4.1 The Billingham Riverside site is allocated within policy EG5 Port and River Based Uses. Uses proposed at this location cover a range of vulnerability classifications including Water Compatible, Less Vulnerable and Essential Infrastructure. The site is identified as being located within the following flood risk zones:

Site Name	Site Area (Ha)	Flood Map for planning (%)			
		FZ1	FZ2	FZ3a	FZ3b
Billingham Riverside	24.75	35.29	18.05	46.66	0.00

- 4.2 The Exception Test is only required for the uses identified within EG5 that are Essential Infrastructure where they would be within FZ3. These uses are storage of hazardous substances awaiting import or export' and 'energy generation plants and infrastructure that are reliant on a port/riverside location'.
- 4.3 The outcomes of the Level 2 SFRA for this site indicate that flood risk and Exceptions Testing could be passed on the basis of ground raising within this tidally influenced area. The Council has completed the Exception Test based on the SFRA. The viability of land raising or alternative appropriate flood defence measures will need to be defined by a Site Specific FRA as and when development proposals are forthcoming.
- 4.4 Acknowledging the range of vulnerability classifications at the site and the associated flood risks the Council propose a suggested modification to the Local Plan which would see the introduction of the following point to be inserted between points 4 and 5 of policy EG4:

'Development at Billingham Riverside, other than water-compatible development (See National Planning Practice Guidance flood risk vulnerability classification), within areas of higher flood risk may be acceptable subject to mitigation and a site specific FRA to confirm that the level of flood risk is acceptable over the lifetime of the development. Development proposals for Essential Infrastructure (See National Planning Practice Guidance flood risk vulnerability classification), should be directed to allocated land within Billingham Riverside with the lowest flood risk in the first instance, unless there are specific requirements to develop an alternative site at Billingham Riverside.'

Common Ground

- 4.5 **That the allocation is acceptable (Exception Test is passed) subject to the proposed amendment.**

Issue 3- Acceptability of the Level 2 and the Sequential and Exception Tests.

- 4.6 Subsequent to submission the Council have worked alongside the Environment Agency to complete the SFRA and have updated the sequential and tests based on the completed SFRA. The updated sequential and exception tests have been shared with the Environment Agency.

Common Ground

4.7 It is common ground that:

- **it is appropriate, based on the information available at this time, for allocation at Boathouse Lane to be removed from the Local Plan.**
- **the Billingham Riverside allocation is acceptable (Exception Test is passed) subject to the proposed amendment;**
- **the SFRA Level 2 is acceptable;**
- **the SFRA has informed Local Plan preparation;**
- **the council has applied the sequential test and where necessary the exception test; and**
- **the exception test is acceptable.**

5 Reducing and Mitigating Flood Risk (ENV4)

The Issue

- 5.1 In response to the Regulation 19 consultation the Environment Agency provided the following response with respect to policy ENV4:

'We support policy ENV4: Reducing and Mitigating Flood Risk Flood risk it's overall aim to focus development in the lower flood risk areas. It should also be noted that flood risk on any land allocated for development should be managed by aiming to develop those parts of the site at the lowest risk of flooding, where possible, to ensure development is not at an unacceptable risk of flooding.'

'We would like to advise the Local Authority that policy ENV4 should be amended to recommend that any new development being brought forward should avoid flood risk areas. Only in exceptional circumstances should development be brought forward within flood zones 2 and 3a.'

- 5.2 The Council are suggesting modifications to policy wording within ENV4 to provide greater clarity, ensure consistency with national policy and address Environment Agency comments. These suggested modifications are detailed within **Appendix 1**.
- 5.3 Environment Agency review of the suggested modifications has been undertaken and they content that they address comments made to the Regulation 19 consultation.

Common Ground

- 5.4 **Suggested modifications to policy ENV4 address Environment Agency comments.**

6 Preserve, protect and enhance biodiversity and geodiversity (ENV5)

The Issue

- 6.1 In response to the Regulation 19 consultation the Environment Agency provided the following response with respect to policy ENV5:

'We are in support of Policy ENV5 and would advise that point 6 is amended to read 'Existing trees, woodlands and hedgerows of amenity or nature conservation value will be protected wherever possible. Where loss is unavoidable replacement of appropriate scale and species will be sought on site where practicable, or at an offsite location where not'. This amendment will provide the flexibility to provide off site mitigation options.'

- 6.2 The Council have suggested the suggested the following modification (SM/LP/0061) to address comments received by the Environment Agency.

'Existing trees, woodlands and hedgerows of amenity or nature conservation value will be protected wherever possible. Where loss is unavoidable appropriate replacement will be of appropriate scale and species will be sought on site, where practicable, or at an offsite location where not.'

Common Ground

- 6.3 Suggested modifications to policy ENV4 address Environment Agency comments.

7 Tees Estuary Partnership

The Issue

- 7.1 The Seal Sands, North Tees and Billingham area is recognised globally as part of the Tees Valley's inter-connected process industries cluster. The area is of vital importance to the local, regional and national economy and the Council will continue to prioritise economic growth in this area, working in partnership with the Tees Valley Combined Authority. At the same time development proposals must continue to work within the set environmental limits to ensure that industrial development and nature conservation objectives are delivered in tandem. A number of these sites are situated near to the Tees Estuary which may constrain development as it is an area identified classified as a Special Protection Area (SPA) which due to the use by a number of internationally protected bird species is subject to a high level of protection. It is also acknowledged that there are proposals to extend the SPA.
- 7.2 Through the Tees Estuary Partnership (TEP) the Council, the Tees Valley Combined Authority, businesses and environmental stakeholders are working proactively to investigate opportunities for business expansion to take place whilst safeguarding and, where possible, enhancing the environment.
- 7.3 The TEP vision is:
- “... for the Tees Estuary is to create an estuary that is an exemplar for nature conservation, with thriving habitats and populations of birds and animals, and which drives sustainable economic growth and business investment in the area.”*
- 7.4 Through the TEP, stakeholders are pursuing strategic mitigation which could mitigate the impact on the SPA/pSPA, and also have additional net biodiversity benefits. However, at the current time no firm mechanism for strategic mitigation is in place.
- 7.5 The Council are preparing a statement of common ground with Natural England and the RSPB in relation to this matter. In response to the Regulation 19 consultation it is noted that Natural England welcomed the approach with ENV5 'Preserve, protect and enhance biodiversity and geodiversity', supported the Habitat Regulations Assessment and did not raise any objections to the allocation of sites.
- 7.6 In response to the Regulation 19 consultation the Environment Agency provided the following response with respect to policy ENV5:
- ‘...we recommend that the Stockton Borough Council Local Plan include specific mention of the Tees Estuary Partnership and the upcoming Tees Estuary Habitat Framework within Policy ENV5, which focuses on preserving, protecting and enhancing biodiversity.’*
- 7.7 The Council have highlighted the Tees Estuary Partnership within the supporting paragraphs to ENV5. The justification specifically highlights the Strategic Masterplan and for the estuary and the Memorandum of Understanding; stating that these documents will have regard to these documents when implementing Local Plan policies. In addition policy EG4 'Seal Sands, North Tees and Billingham', which allocates land for employment development, provides specific policy for considering development proposals in relation to cumulative

impacts (see point 2). In addition policy justification to EG4 provides further detail regarding the TEP and directs the reader to policy ENV5.

Common Ground

7.8 The Local Plan sufficiently references the Tees Estuary Partnership.

8 Overview and conclusions

8.1 The following has been agreed between the parties:

- **It is appropriate, based on the information available at this time, for allocation at Boathouse Lane to be removed from the Local Plan.**
- **The Billingham Riverside allocation is acceptable (Exception test is passed) subject to the proposed amendment;**
- **The acceptability of the SFRA (both Level 1 and 2);**
- **The Local Plan in based on the SFRA**
- **The sequential test and where necessary the exception test have been applied.**
- **The exception test is acceptable.**
- **Amendments to policies ENV4 and ENV 5 address Environment Agency comments**
- **The Local Plan sufficiently references the TEP**

8.2 There are no matters of disagreement.

Appendix 1: Suggested modifications to policy ENV4 (reduced and mitigating flood risk)

Policy ENV4 - Reducing and Mitigating Flood Risk

1. ~~All New~~ development will be located to minimise the directed towards areas of low flood-risk of flooding from all sources, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles. ~~(Flood Zone 4). In considering proposals elsewhere, the sequential and exception test, will be applied. Site specific flood risk assessments and drainage strategies will be required in accordance with national policy.~~
2. ~~In exceptional circumstances developments may be permitted in higher flood risk areas to meet strategic regeneration objectives within the Regenerated River Tees Corridor as identified within policy SD3 or to provide essential infrastructure. Where necessary mitigation measures would have to be identified through a detailed Flood Risk Assessment.~~ Development at risk of flooding will only be permitted following:-
 - a. The successful completion of the Sequential and Exception Tests (where required);
 - b. A site specific flood risk assessment, demonstrating development will be safe over the lifetime of the development, including access and egress, without increasing flood risk elsewhere and where possible reducing flood risk overall.
3. Site specific flood risk assessments will be required in accordance with national policy.
- ~~3.4.~~ Development proposals will be designed to ensure:
 - a. ~~They will be safe over the lifetime of the development, taking account of climate change.~~ Opportunities are taken to mitigate the risk of flooding elsewhere;
~~Flood risk is not increased elsewhere and will where possible, reduce flood risk overall;~~
 - b. Foul and surface water flows are separated;
 - c. Appropriate surface water drainage mitigation measures are incorporated and Sustainable Drainage Systems (SuDS) are prioritised; and
 - d. SuDS accord with the Tees Valley Authorities Local Standards for Sustainable Drainage (2015).
- ~~4.5.~~ Surface water run-off should be managed at source wherever possible and disposed of in the following hierarchy of preference sequence:
 - a. To an infiltration or soak away system; then,
 - b. To a watercourse open or closed; then,
 - c. To a sewer.
- ~~5.6.~~ Disposal to combined sewers should be the last resort once all other methods have been explored.
- ~~6.7.~~ For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1-in-1 year rainfall event and the 1-in-100 year rainfall event should be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event. For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1-in-1 year rainfall event and the 1-in-100 year rainfall event should never exceed the peak greenfield runoff rate for the same event.
1. Within critical drainage areas or other areas identified as having particular flood

risk issues the Council may:

- a. Support reduced run-off rates.
 - b. Seek contributions, where appropriate, towards off-site enhancements directly related to flow paths from the development, to provide increased flood risk benefits to the site and surrounding areas.
2. Major development (residential development comprising 10 dwellings or more and other equivalent commercial development) will be required to submit a drainage strategy to show the site drainage can be adequately dealt with. The proposed drainage scheme should incorporate SuDS unless it can be demonstrated that they would be inappropriate. The incorporation of SuDS should be integral to the design process and be integrated with green infrastructure. Where SuDS are provided arrangements must be put in place for their whole life management and maintenance.
 3. Through partnership working the Council will work to achieve the goals of the Stockton-on-Tees Local Flood Risk Management Strategy & Northumbria Catchment Flood Management Plan. This will include the implementation of schemes to reduce the risk of flooding to existing properties and infrastructure. Proposals which seek to mitigate flooding, create natural flood plains or seek to enhance and/or expand flood plains in appropriate locations will be permitted.
 4. To reduce the risk of flooding the Council is working in partnership with the Environment Agency to deliver a Flood Alleviation Scheme on Lustrum Beck.

8.34 Reducing and mitigating flood risk is an important issue for planning particularly as the effects of climate change are being realised. To ensure sustainable economic growth is achieved, it is essential that development (new and existing) is safe from flooding and incorporates approaches to reduce risk. When addressing flood risk it is important to consider all sources of flooding which include fluvial, surface water, sewer and groundwater flooding. The Borough has been subject to severe flooding in the last few years. Over 200 homes and businesses suffered damage and disruption from severe weather events in September 2012, May 2013, September 2013 and December 2013.

8.35 The latest flood zone maps for the Borough are accessible through the Environment Agency and identify areas of land at risk from all sources of flooding. This policy seeks to ensure development will be located to minimise the risk of flooding from all sources. Development in areas at risk of flooding be required to apply the sequential and exception tests (where required),~~direct new development to areas at lowest risk of flooding in accordance with the flooding sequential test, which directs development to flood zone 1. If it is not possible to direct uses to the lowest risk areas, then the exception test must be applied. This considers the wider sustainability benefits of the proposal and involves a site specific flood risk assessment which must demonstrate the development is safe and does not increase flood risk elsewhere.~~

8.36 The Council have undertaken a Strategic Flood Risk Assessment (SFRA) which provides further information regarding flood risk including the impacts of climate change. The Council as the lead Local Flood Authority (LLFA) is responsible for preparing a local flood risk management strategy and maintaining a register of flood risk assets. Flood alleviation schemes have recently taken place at Port Clarence and Greatham South, and Lustrum Beck. The Council have identified in the Local Flood Risk Management Strategy opportunities to reduce and mitigate flood risk; this includes engagement in the development management process through the provision of pre-application advice.

~~8.368.~~37 Before deciding on the scope of a site specific flood risk assessment, the SFRA should be consulted along with the Local Planning Authority, LLFA, the Environment

Agency and Northumbrian Water. The completed Flood Risk Assessment should be submitted to the Local Planning Authority for approval.

~~§.378.38~~ Sustainable drainage systems (SuDS) are now the preferred approach to managing rainfall from hard surfaces and can be used on any site. The primary purpose of SuDS is to mimic the natural drainage of the site prior to development. This is achieved by capturing rainfall, allowing as much as possible to evaporate or soak into the ground close to where it fell, then conveying the rest to the nearest watercourse to be released at the same rate and volumes as prior to development. There are many different SuDS features available to suit the constraints of a site. SuDS schemes provide many benefits beyond just reducing flood risk, such as assisting in improving water quality, creating new habitats for wildlife, providing a valuable amenity asset and passive cooling.

~~§.388.39~~ To provide more information and technical guidance on SuDs techniques, the five Tees Valley Authorities (Middlesbrough Council, Stockton Borough Council, Darlington Borough Council, Redcar & Cleveland Council and Hartlepool Borough Council) have jointly produced the Tees Valley Authorities Local Standards for Sustainable Drainage (2015).

~~§.398.40~~ It should be noted that, ground conditions in the Borough are not usually suitable for infiltration; ~~therefore, and~~ infiltration/ soak away systems are not usually accepted as a method for surface water disposal. Appropriate assessments should be undertaken to determine ground conditions to determine the most appropriate methods for managing surface water.

~~§.408.41~~ The Council will require new development to take account of future predicted climate change in line with the priorities set out in the adopted Climate Change Strategy 2016, and ensure it is resilient to risk, adopting appropriate climate change mitigation and adaptation principles in line with policy SD5.

~~§.418.42~~ Building on information in the SFRA 2011, the ~~The~~current SFRA identifies Lustrum Beck, Billingham and Yarm as draft or candidate ~~€~~Critical ~~D~~rainage ~~a~~Areas; they have a significant history of flooding or are at risk of significant flooding. This flooding may be from a single source or multiple sources with complex interactions. In these areas and other areas with flood risk issues it may be beneficial to restrict runoff rates to a level to provide flood risk benefits. The Council may also seek contributions towards off-site enhancements directly related to flow paths from the development, to provide increased flood risk benefits to the site and surrounding areas.

~~§.428.43~~ Communities along Lustrum Beck have been the subject of severe flooding, most recently in September 2012. The Council are working in partnership with the Environment Agency to deliver a flood alleviation scheme for Lustrum Beck. The first phase of the scheme was completed in March 2017 and involved a range of measures including a new bespoke lifting screen at Primrose Hill culvert, the demolition and replacement of Londonderry Bridge, flood walls and embankments and a sustainable drainage scheme, on the site of the former adult training centre on Wrensfield Road. A second phase of the scheme will use natural flood risk management techniques to hold back flows in the upper catchment of Lustrum Beck (Hartburn Beck) in the Coatham Woods area. Any development which would discharge into the Lustrum Beck catchment should not compromise the scheme and where possible enhance its benefits.