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***FEEDBACK STARTS BELOW:***

The most troubling events to have occurred in King's Somborne in the last twenty years were the floods of 2000 and 2014. Many houses lying in the village valley were flooded, caused mainly by rising groundwater.

2. Annex A to this document is a view looking south from KS3, taken on 16 February 2014 demonstrating that KS3 is an effective and extensive flood plane.

3. Preventing, or not exacerbating, further flood risk must be the highest priority for the Neighbourhood Development Plan (NDP).

4. The proposed NDP favours further development in the valley floor of the village, below the 40m contour line, specifically at KS3, KS7 and SHELAA 81 [Policy E4 and H6]. All are adjacent to a flood zone 3 (defined by the Environment Agency as Land having a 1 in 100 or greater annual probability of river flooding) with shallow rises in altitude.

5. There is a logical risk that when a downpour combines with already high groundwater, water will flow from a development's roofs, roads, drives and pavements to the flood plane many times quicker than if it remained a field.

6. In such circumstances, the borne level is likely to rise more quickly. Water will level out both up and down-stream, adding to the flash flood risk along its length through the village.

7. Whilst Appendix 1, Section 5.2 states a plan objective ... To ensure development does not increase flood risk to the existing settlement, no flood risk assessment has been undertaken as part of the NDP process, so the above potential flood risk associated with development of KS3, KS7 and SHELAA 81 is unknown and unquantified.

8. It is noted that use of sustainable drainage systems (SuDS) will be a requirement at the planning stage, but use of attenuation tanks below the water table would be ineffective. This is likely to be the case at KS3, KS7 and SHELAA 81 as their altitude rise is shallow above the adjacent flood zone 3.

9. Attenuation tanks work well above the water table, however, so why is the policy not to develop land above the 40m contour line, not below? This would surely be in the village's best interests in protecting against flooding?

The NDP Policy E4 states that all new development should be below the 40m contour line. No evidence is referenced (in either NDP-Summary Section 3.1 or Appendix 1-Landscape and Environment Section 1.3) to support this, or the following phrase driving the policy ... Ensure that new development is kept within the floor of the valley, [preferably below the 40m contour line], so it does not obtrude into the views from the high points of the surrounding landscape and of the village, and so that the settlement remains invisible in the wider landscape.

The only third party assessment commissioned in support of the NDP is a Landscape Assessment by the South Downs National Park Authority, from which the impact of flooding is excluded from scope. The fee proposal for the assessment states "We are able to interpret evidence as it applies to local areas ensuring the NDP takes into account its local historic environment, landscape character, biodiversity etc., while meeting the needs of the local people and having the best chance at passing referendum" i.e. no account of flood risk is taken in the same paragraph that states an objective to pass the plan at referendum.

Furthermore, Appendix 1 – Detailed Methodology – states at paragraph 1.3 ... "Landscape is just one of a number of considerations required to make decisions about the acceptability or otherwise of proposed development, and these may conflict with one another."

And finally in Section 2.6, the TVBC policies quoted do not take flood risk into account either.

From the questionnaire results, Question 11 asks ...

"... areas such as How Park, Cow Drove Hill and the Clarendon Way, from which there are attractive views of the village. Should landscape features, such as surrounding farmland be identified and preserved?" To which there was a 94% "yes" response. Such a leading question cannot be construed as evidence that the village prioritises landscape and vistas above flood risk.

13. Nowhere is there a reference to the potential conflict between objectives to protect landscape [build below the 40m contour line] versus the need to prevent flood risk [build above the 40m contour line], so one is left assuming that visual impact is prioritised above flood risk. This cannot be in the village's best interests.

Recommendation

Change Policy E4 to read ... "All new development in King's Somborne should be generally above the 40M contour line" SuDS would then definitely be effective and developments would not increase flood risk

Or

Commission a flood risk assessment from a competent body for KS3, KS7 and SHELAA 81 before conclusion of the consultation phase. It is surely possible to make relevant and reasonable assumptions about the likely scale and nature of development such that the runoff risk can be quantified and mitigation schemes evaluated. Conclusions of such an assessment should be presented to villagers by representative(s) of the competent body for comment and questioning before closure of the consultation phase. Then update the NDP according to the risk assessment outcome and recommendations.

Policy E5 states - Any new multi-home development is to be sited close to other built-up landscape such that it is a natural extension of the existing village, rather than as a distinct separate development. Developing KS 3 breaches this policy as none of the houses built will be adjacent to the existing settlement. The development will therefore not be a natural extension of the existing village, and will be a distinct separate development. The proposed development will only have point adjacency - at its north west corner to Rivermead - at its north east corner to Fromans House. It will therefore be an island development of mainly affordable homes close to two properties at the opposite end of the housing spectrum. The supporting paragraph to Policy E5 states "Ensure that new development is sited close to other built-up landscape, so it is viewed as natural extension of the existing village, rather than as a distinct separate development. Reason: This will not stand out as new development but blend with existing buildings. This will look harmonious within the wider countryside." As an island development, KS 3 cannot be viewed as a natural extension to the village and will be a distinct separate development. It will not blend in with existing buildings because social housing could not be more different to the two houses closest to the proposed development (i.e. Rivermead and Old Fromans).