

## Jinder Ubhi

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**From:** Julie Blackburn [REDACTED]  
**Sent:** 16 February 2018 19:34  
**To:** Londonplan  
**Cc:** [REDACTED]  
**Subject:** Flooding and the London plan consultation

Dear Madam/Sir

We, the Caterham Flood Action Group (CFAG), representing flood victims of Old Coulsdon in the London Borough of Croydon (LBC), Chaldon and Caterham on the Hill (Surrey County Council (SCC) and Tandridge District Council (TDC)) would like to raise some concerns with regard to Si12 of the Draft London Plan.

We're aware of the desperate need for sustainable homes, but the National Planning Policy Framework is quite clear...

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

We are concerned by the quantity of builds set for LBC ie 29,490 over 10 years, which DEFRA ranks as the 4th settlement in England most susceptible to surface water flooding.

The London Borough of Croydon's Local Plan is to be adopted any moment, we welcome the comments from the inspector...

FYI ...

169). In light of the convincing evidence of Croydon's serious and extensive surface water flooding problems, I do not agree that the improvement over greenfield runoff rates sought by policy DM26.3(c) should be reduced to an aspiration. Nor, in this instance do I consider that the last two sentences of paragraph 8.24 should be elevated to policy. The penultimate sentence is no more than a statement of the obvious. The final sentence is simply pointing to policy in the London Plan rather than setting policy for Croydon. The Council's suggested addition of an explanatory sentence to paragraph 8.26 adds further to the justification for policy DM26 and so contributes to its soundness. Policy DM26 applies equally to all forms of flooding and so an absence of a specific reference to sewer flooding does not make the plan unsound.

DM26 is on page 99 (or 134 of 358)

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Local%20Plan%20Detailed%20Policies%20and%20Proposals%20-%20Proposed%20Submission.pdf>

At the time of writing the LBC Local Plan, states 33,614 residential properties are at risk of surface water flooding in the Borough, we don't want to see that increase, for flooding destroys homes (Today the Environment Agency (EA) launched the Flood action campaign...

[https://floodsdestroy.campaign.gov.uk/?utm\\_campaign=floodsdestroy17&utm\\_source=Article%20National&utm\\_medium=Refferal&utm\\_content=Articles](https://floodsdestroy.campaign.gov.uk/?utm_campaign=floodsdestroy17&utm_source=Article%20National&utm_medium=Refferal&utm_content=Articles)

Climate change will see that number increase without proactive action, Met Office research has found in England and Wales there is a one in three chance of a new monthly rainfall record in at least one region each winter.

Properties built after 2009 are not eligible to apply for Flood RE (affordable insurance) because the Gov expect us not to be building on flood risk areas, they also expect the UK to be flood resilient by 2039, when the scheme runs out, so we have to start planning not to flood now!

The LBC are the Local Lead Flood Authority (LLFA), they must by law manage the flood risk, yet LBC also own the private development company Brick by Brick (we have slight concerns over conflict of interest), consequently they'll be very happy with a hefty housing quota BUT drainage infrastructure is inadequate to cope as it stands today without additional thousands !!

The National Planning Practice Guidance states, "Adequate water and wastewater infrastructure is needed to support sustainable development". Utility companies (Thames water (TW) in this area) are obliged to make connections regardless of the consequences downstream, thus homes become filled with effluent in the event of a storm, we would like to see utility companies become statutory consultees to ALL planning applications in a flood risk area (as defined by the LLFA) to protect homeowners from sewage flooding.

The quantity of new builds set must therefore, be reconsidered / reduced, taking the very real flood risk into account.

Many homes were flooded in June 2016 and not for the first time, for some this is the fourth time in twenty years ie a 1:5 flood risk! I personally am terrified of development... And rain from the surrounding area but also from SCC/TDC.

[https://www.surreycc.gov.uk/\\_data/assets/pdf\\_file/0007/106198/Section19\\_CaterhamFlood\\_7June2016.pdf](https://www.surreycc.gov.uk/_data/assets/pdf_file/0007/106198/Section19_CaterhamFlood_7June2016.pdf)

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Caterham%20Drive%20S19%20Report%20Final.pdf>

SCC as LLFA stated in a public meeting on 13th July 2016 that they had not met their statutory duty, the LGO has upheld a complaint against LBC, 'failure to manage flood risk'. The CFAG was formed with the help of the National Flood Forum (NFF), thankfully (and eventually, having all complained and campaigned as individuals, for almost two decades), we hold regular multi-agency meetings in the hope of finding a long term solution YET we're still at risk and development continues in a surface water flood risk area putting additional strain on the above mentioned failing infrastructure, the 'guidelines' in place must be adhered to and written into ALL Local Plans.

We note the need for cooperation cross-boundary and are grateful discussions have begun between LBC, SCC, TDC, EA and TW, BUT we've had to fight for that, it was not automatic. What measures are in place to guarantee that councils on the edge of the London Basin are considering the quality and capacity of the infrastructure 'downstream', flood risk should not be discharged from one area and permitted to flow into London. We must therefore, ensure ALL counties surrounding London are aware of their responsibility as riparian owners and that their local plans reflect this.

Kind regards  
Julie Blackburn  
(For and on behalf of the Caterham Flood Action Plan)

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