

TE2100 on-line consultation

Comments submitted by CPRE Thames Gateway (June 2006)

Regeneration reach

8.1 Do you have any general comments on future flood risk management options in this reach?

CPRE is principally concerned that the opportunities for bringing low-lying urban sites back into use as development sites should not be overlooked where flood defence and resilience can be incorporated to good effect. It would be inappropriate - and contrary to sustainable development principles - to overlook regeneration opportunities by avoiding low-lying urban areas. We therefore welcome the acknowledgement that the Regeneration Reach will be the location of a large amount of new development and that those developments can incorporate resilience to flooding.

9.1 Which of the possible future flood risk management options for this reach do you particularly support? Why, and if relevant, where?

In the Regeneration Reach, we particularly support those measures which enable vacant, derelict and under-used urban land to be made available for re-development. The option under "Control structures" are therefore of particular interest.

9.2 Which of the possible future flood risk management options for this reach could create problems? Why, and if relevant, where?

Problems could be caused by the following options Under "Flood storage":

"Controlled inundation and Regulated tidal exchange"
"Floodplain Restoration and Managed Realignment"

The problems could be caused where areas chosen for flood water storage could be used for accommodating new housing and other development, were flood resilience and flood defences measures to be incorporated.

CPRE is principally concerned that the opportunities for bringing low-lying urban sites back into use as development sites should not be overlooked where flood defence and resilience can be incorporated to good effect. It would be inappropriate - and contrary to sustainable development principles - to overlook regeneration opportunities by avoiding low-lying urban areas. We therefore welcome the acknowledgement that the Regeneration Reach will be the location of a large amount of new development and that those developments can incorporate resilience to flooding.

The Lower Estuary Reach

10.1 Do you have any general comments on future flood risk management approaches in this reach?

CPRE 's principal concern with regard to flood risk is that the risks should be managed responsibly so as to enable development to take place in urban areas while avoiding development outside urban areas. We would object to the provision or enhancement of hard flood defences that would merely facilitate the development of land beyond existing urban areas. Where additional hard flood defences outside of urban areas are proposed, the case for them should not rest on the value of any additional land made available for development. For example, any cost/benefit analysis of the scheme should not take account of resultant rises in land values arising out of increased developer interest and should not assume that developer contributions may be forthcoming in due course.

11.1 Which of the possible future flood risk management options for this reach do you particularly support? Why, and if relevant, where?

We draw a strong distinction between the preferred choice of options that should be considered for urbanised areas and land beyond those urbanised areas in this reach. CPRE 's principal concern with regard to flood risk is that - within in urban areas - the risks should be managed responsibly so as to enable development to take place on low-lying areas of previously-developed land. For urban areas, therefore, the options listed under 'Control structures' are preferable. Under 'Flood warning and changing behaviour', all options should be given a high priority, with the caveat that "Land-use management" and "Land-use planning" should not be taken to mean "avoidance of low-lying urban sites". Beyond urbanised areas, "Flood storage" options should be given a high priority.

11.2 Which of the possible future flood risk management measures for this reach could create problems? Why, and if relevant, where?

Under 'Flood warning and changing behaviour', for urban areas, the options of 'Land-use management' and 'Land-use planning" should not be taken to mean 'avoidance of low-lying urban sites since this could unnecessarily conflict with the need to promote urban regeneration and prevent unnecessary development beyond urbanised areas. Furthermore, also in urban areas, the options of 'Controlled inundation and Regulated tidal exchange' and 'Urban floodplain storage (tributaries)' may unnecessarily restrict the availability of urban brownfield land for redevelopment.

11.3 Do any of the possible future flood risk management measures conflict with existing or future plans and policies within this reach?

As indicated and illustrated in response to the previous questions, options which unnecessarily restrict the availability of urban brownfield land for redevelopment are likely to be in conflict with policies for the regeneration and intensification of urban areas within the Thames Gateway and the avoidance of development beyond urban areas.

NK
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