

Environment Agency Position Statement – 26/9/11

Following the opening of the Core Strategy examination and questions raised by the Inspector in relation to the Environment Agency's position on the Core Strategy, and on the weight afforded to flood risk against other sustainability criteria, we felt it appropriate to clarify our position.

The Environment Agency have been closely involved in the production of the Selby Core Strategy and the associated evidence base in relation to flood risk. The Council have undertaken both Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA). The Level 1 SFRA addressed flood risk at a broad scale across the district, whereas the Level 2 focussed upon the Strategic Development Sites (SDS) identified by the Council. The purpose of the Level 2 SFRA was to identify the level and severity of flood risk to each SDS. We worked in partnership with the Council and their consultants Scott Wilson to ensure that the SFRA provided an accurate and detailed assessment of flood risk to inform the Council's decision making. We are satisfied that the SFRA achieves this.

Using the SFRA, the Council then applied the sequential test to the selection of strategic sites. As a result of this, the Olympia Park site emerged as the Council's preferred SDS. We are aware that other sites at lower flood risk were discounted on other sustainability grounds. We were not involved in deciding upon the relative weighting of any sustainability factors during this process. The Environment Agency's role in this process was to advise and support the Council on the production of the flood risk evidence base in order that the sequential test could be applied rather than to comment on the prioritisation of sustainability criteria. Our expertise in these matters is limited to assessing technical flood risk, and it would be inappropriate for us to be drawn on other matters pertaining to wider sustainability. We consider that the Council have been provided with the best available information regarding flood risk to enable their full consideration of the appropriateness of their strategy when weighed against all sustainability criteria.

With specific reference to Olympia Park, we consider that the Council have been able to reach a decision on the suitability of the site in full possession of the best available flood risk information at the time. Information provided by the Level 2 SFRA shows the overall risk of developing the site, taking account of the nature and severity of flooding. The Level 2 SFRA also provides an appropriate evidence base to allow the assessment of part (c) of the Exception Test. It is not for the Environment Agency to decide if, in the selection of its preferred SDS, the Council has afforded sufficient weight to flood risk against other factors. This matter is outside of our remit as technical advisors and a judgement on this should be the role of the decision maker.

Overall, we are satisfied that the council, in the production of the Core Strategy have compiled a robust evidence base in relation to flood risk, through the SFRA, and have undertaken the strategic sequential test using the best available information.