

DECISION STATEMENT

NEIGHBOURHOOD PLAN PROCEEDING TO REFERENDUM

1. Formby and Little Altcar Neighbourhood Plan

- 1.1 I confirm that the Formby and Little Altcar Neighbourhood Plan, as revised according to the modifications set out below, complies with the legal requirements and Basic Conditions set out in the Localism Act 2011, and with the provision made by or under sections 38A and 38B of the Planning and Compulsory Purchase Act 2004. The Plan can therefore proceed to referendum. A provisional date has been set for the referendum of 10 October 2019.
- 1.2. I also declare that I have no personal or prejudicial interest in respect of this decision.

Signed

Derek McKenzie

Chief Planning Officer

2. Background

- 2.1 On 12 September 2013 Sefton Council approved the Formby and Little Altcar Neighbourhood Area for the purpose of preparing a Neighbourhood Plan in accordance with Part Two of the Town and Country Planning (England), Neighbourhood Planning (General) Regulations 2012.
- 2.2 Following submission of the Formby and Little Altcar Neighbourhood Plan to the Council, the plan was publicised and representations were invited. The publicity period ended on 15 May 2019.
- 2.3 Sefton Council appointed an independent examiner, Andrew S Freeman to examine whether the Plan meets the basic conditions and legal requirements and should proceed to referendum.
- 2.4 The Examiner's Report concludes that, subject to making the recommended modifications, the Plan meets the basic conditions set out in the legislation and should proceed to a Neighbourhood Planning Referendum.
- 2.5 Sefton Council Cabinet Member agreed that the Formby and Little Altcar Neighbourhood Plan should proceed to referendum.
- 2.6 Having considered each of the recommendations made in the Examiner's Report, and the reasons for them, the Council has decided to make the modifications to the draft plan set out in the Appendix, Annex A and Annex B to ensure that the draft plan meets the basic conditions set out in legislation, and for the purpose of correcting errors.

3. Decisions and Reasons

- 3.1 The Council has made the modifications proposed by the Examiner to ensure that the draft Plan meets the basic conditions, and for the purpose of correcting errors in the text to enhance the clarity of the plan as set out in the Appendix and Annexes.
- 3.2 The Council has considered whether to extend the area in which the referendum is to take place and agrees with the Examiner that there is no reason to extend the Neighbourhood Plan Area for the purpose of holding the referendum.
- 3.3 The Examiner has concluded that with the recommended modifications made the Plan meets the basic conditions and other relevant legal requirements. The Council concurs with this view. Therefore, to meet the requirements of the Localism Act 2011 a referendum which poses the question '**Do you want Sefton Council to use the Neighbourhood Plan for Formby and Little Altcar to help it decide planning applications in the neighbourhood area?**' The referendum will be held in Formby.
- 3.4 The date on which the referendum will take place is anticipated to be 10 October 2019.

Appendix: Examiner Recommended Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 1	Delete the second sentence of Footnote 1.
PM2	Page 1	Delete Footnote 2.
PM3	Page 5	Replace the first sentence of Section 1.1.2 with the following: "In March 2013, Formby Parish Council submitted an application to Sefton Council to have the area designated as a NDP Area."
PM4	Page 5	Delete section 1.1.5. Add the following sentence at the commencement of Section 1.1.6: "The Neighbourhood Plan has been screened for Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) by Sefton Council." Replace the full stop after "shared evidence base" with a comma.
PM5	Page 5	In Section 1.1.10 (and all other instances where the NPPF is referenced or quoted), make use of the February 2019 version of the Framework.
PM6	Page 6	Switch the position of Maps 1 and 2. Change the titles to "Formby & Little Altcar Neighbourhood Development Plan Area"; also, the title of all other maps in the Plan, as appropriate.
PM7	Page 9	On the key to Map 3, add the words "(to high water mark)" after "Sefton Boundary".
PM8	Page 19	On Map 6, amend "Grade I" to "Grade II*". Show the Grade II* listed buildings as red dots (not yellow dots). Change "Conservation Areas" to "Conservation Area".
PM9	Page 31	Update Map 10 to refer to "Local Plan Green Belt map April 2017". Delete "Modification Stage". Delete Map 9. Substitute the following for Section 3.2.5: "A further factor is the Green Belt boundary. This has been changed under the Local Plan for Sefton. Map 10 shows the new boundary."
PM10	Page 7	In Section 1.3.1, substitute the following for the second bullet point: "that appropriate public green space is provided".
PM11	Page 15	Replace Section 2.4.3 with "The Neighbourhood Plan area contains a number of important wildlife sites:". List the SPA, Ramsar, the Sefton Coast SSSI and Local Nature Reserves.
PM12	Page 22	In Section 2.7.1, delete "statutory". In the following table, change the first reference to Grade "II" (box with blue colour

		coding) to Grade "II*".
PM13	Page 23	Delete the content of Page 23. Replace with the information on Local Heritage Structures of Interest as provided in the Parish Councils' response to the Examiner Procedural Matters and Questions, 31 May 2019. Add a sub-heading which reads as follows: "Consideration of locally listed heritage will be in line with Local Plan Policy NH15 with any architectural remains being protected under Policy NH14."
PM14	Page 27	At the end of the first sentence of the second paragraph of Section 3.1.6, add ", the Open Space SPD (2017) and the Sefton Playing Pitch Strategy (2016)."
PM15	Page 29	In the second paragraph of Section 3.1.9, replace ""Open space, sport and recreation facility assessment" (2008) outlines" with "Open Space and Playing Pitch Strategy 2015 supplemented by the Open Space SPD (2017) and the Sefton Playing Pitch Strategy (2016) outline".
PM16	Throughout Section 4	Move all Community Actions and any justification/supporting text to a separate Annex. Make consequential amendments to the text.
PM17	Pages 64 to 66	Move the content of Section 5 to an Annex.
PM18	Page 25	In Section 3.1.2, refer to "six" key themes. Add "Flooding" to the bullet points.
PM19	Page 28	<p>Replace the text in Section 3.1.8 with the following text:</p> <p>"Much of the designated area of Formby and Little Altcar is vulnerable to flooding. In places, flooding takes place on a fairly regular basis. In the Residents' Survey, flooding was identified as a major concern for the community with over 51% of respondents stating that they had been affected in some way by flooding. Floodwater in roads in and around residential areas was cited as the major problem (by 60%) but flooding within property boundaries was recorded by 30% of respondents. Flooding in Formby and Little Altcar is thus a very serious issue, an issue which the Parish Councils are determined to take seriously.</p> <p>Flooding, actual or potential, is the result of a number of factors. First, and in terms of inundation, there are several nearby sources of potential flood water. These include the Irish Sea to the west, Downholland Brook to the east and the River Alt to the south all in circumstance where the built-up area of the parishes occupies low-lying land. Secondly, surface water flooding is an issue notably in areas of constrained drainage. In addition, there is a potential risk of</p>

		<p>groundwater-related flooding based on areas of shallow groundwater levels. Groundwater-related flooding can also influence surface water flood risk and fluvial flooding as well as constrain drainage.</p> <p>Sewer flooding is an additional problem. Parts of the sewer system have insufficient capacity to cope with severe rainfall events. This is compounded by high water levels in the River Alt notably at times when non-return flaps are closed. Sewers discharging into the Alt cannot drain freely and water backs up along the sewers.</p> <p>Residents themselves are critical of the drainage system, its capacity and maintenance, particularly highway drainage. There are concerns about the ability of the system to accommodate the current flow rate in some areas as well as future capacity following any development.</p> <p>Areas most at risk of flooding normally comprise the land within Flood Zones 2 and 3. In Formby, the definition also covers areas with critical drainage problems even though they may fall within Flood Zone 1. These flood risk areas are shown on Map X although reference should be made to the latest plans on the Environment Agency’s website and Surface Water Flood Risk Maps. Areas at risk from sources other than rivers and the sea are not shown. The defined flood risk areas may change in the future, for example, in recognition of climate change or actual flood events.</p> <p>In terms of flood risk, 420 homes within Formby are at a 3.3% risk of flooding in any year (Sefton’s Surface Water Management Plan). This means that, in any year, there is a 3.3% risk of flooding to 4% of Formby’s homes, businesses and infrastructure in circumstances where the Sefton average is 2%.</p> <p>The topic is explored in detail in one of the evidence base documents (EB11, Flooding Document). The content is not repeated in the Neighbourhood Plan. The Flooding Document contains detailed aspirations (non-policy) of the Parish Councils with regard to flooding.”</p>
PM20	Pages 29 to 41	<p>Add Section 3.1.9 (Open Space) to the end of Section 3.1.6 (Leisure and Well Being). Add Section 3.1.10 (Housing Styles) to the end of Section 3.1.3 (Housing). Add Section 3.1.11 (Employment) to the end of Section 3.1.4 (Working and Shopping). Add Section 3.4.9 (Retail) to the end of Section 3.4.4 (Working and Shopping). Add Section 3.4.10 (Connections) to the end of Section 3.4.5 (Getting Around). Add Section 3.4.11 (Community Assets) to the end of Section 3.4.6 (Community, Leisure and Wellbeing) and add the words</p>

		“Consideration of the buildings identified as community assets will be in line with Local Plan Policy NH15.”
PM21	Page 29	Replace Sections 3.2.1 and 3.2.2 with the following: “With regard to flooding, the main constraints are referred to in Section 3.1.8 above. Given that the priority of the Parish Councils is to reduce and minimise flood risk for all existing and future residents, flooding will have a significant effect on where new development is going to be located.”
PM22	Pages 32 to 37	Delete Section 3.2.7 and all the following text up to and including Section 3.2.13.2.
PM23	Page 37	Add a new Section after Section 3.3.7: “3.3.X The avoidance of significant flooding stands out as a major concern for the community and an important issue that has influenced the Vision.”
PM24	Page 38	After “climate change” in the second paragraph of the Vision Statement (Section 3.4.1), add “resilient to significant flooding and”.
PM25	Page 38	In Section 3.4.2.1 (The Core Objectives), refer to “six” headings. Add a bullet point “flooding”.
PM26	Page 41	<p>Insert a new Section 3.4.8:</p> <p>“3.4.8 FLOODING</p> <p>Main comments raised by local people during the informal consultation and various questionnaires include:</p> <ul style="list-style-type: none"> • major problem in roads in and around residential areas • highway drainage causes most problems • issue with surface water flooding • flooding within property boundaries • maintenance issues • concern for future capacity following any development • well documented problems • capacity of sewerage system requires attention <p>OBJECTIVE: Reduce and minimise flood risk for all existing and future residents.</p> <p>OBJECTIVE: Address sewerage capacity issues.</p> <p>OBJECTIVE: Secure satisfactory maintenance.</p> <p>OBJECTIVE: Utilise knowledge of flooding and sewerage problems.”</p>
PM27	Page 8	Replace Section 1.4.2 with the following: “Sections 1 to 4 together with Appendix A (Glossary) all form part of the

		<p>neighbourhood plan and should be read as a whole. Annex A sets out Community Actions that the Parish Councils will be pursuing separately. Annex B (Developers working with the Community) sets out the key matters to which the Parish Councils will expect developers to have regard in implementing planning permissions.”</p> <p>In Section 4.1.1, replace “Section 4” with “Section 3”.</p>
PM28	Page 28	Prepare and insert after Section 3.1.8 a map entitled “Flood Risk Areas” illustrating Flood Zones 2 and 3 together with the Critical Drainage Areas. Provide a link to the flood risk maps of the Environment Agency and Surface Water Flood Risk Maps
PM29	Section 4	Give all the policies a title (see Annex A of this report). Add reasoned justification as specified in other proposed modifications.
PM30	Appendices A and C	Remove from the Plan Appendices A and C.
PM31	Page 43	<p>In Policy GP1, take all the text after the second bullet point and include within a “Justification/Supporting Text box.</p> <p>In the second bullet point, insert “essentially” before “the A565 (Formby Bypass)”; also in a) in the fourth bullet point.</p> <p>In the third bullet point (to be part of the reasoned justification), replace “housing allocations below” with “housing allocations in the Local Plan for Sefton”. After “providing for significant growth, whilst” insert “(in accordance with the Local Plan and national policy)”.</p>
PM32	Page 44	On Map 11, change “Urban Area” to “Settlement Boundary”. Include housing allocation MN2.15, the existing Formby Industrial Estate and the strategic employment allocation MN2.49 within the Settlement Boundary.
PM33	Page 45	Delete the fourth word in the section 4.3.5 (“supports”). Replace the first sentence of the second paragraph with: “The draft Local Plan for Sefton required approximately 640 dwellings per annum (dpa) but, during the examination, a sub-regional assessment of housing and employment need (SHELMA) was prepared”.
PM34	Page 45	Delete Policy H2.
PM35	Page 45	Delete Policy H3.
PM36	Page 46	At the end of Policy H5, add the following: “as part of the Council’s mix of affordable housing tenures”.

		<p>Combine Policies H4 and H5 by adding Policy H5 (as modified) to the end of Policy H4.</p> <p>Throughout the combined policy, replace “should” with “shall”.</p> <p>In clause a) of Policy H4, delete “fully”. At the end of clause c) replace “Strategy” with “statement”.</p> <p>Add a Justification/Supporting Text box stating:</p> <p>“As far as possible, affordable housing should be integrated with market housing. Local Plan Policy HC1 Part 8b requires reasonable dispersal in groupings of no more than 6 affordable housing units.</p> <p>Application of the policy will be subject to considerations of viability as set out in the NPPF and Local Plan Policy HC1.</p> <p>The local needs of Formby and Little Altcar will be assessed having regard to the Strategic Housing Market Assessment (SHMA) 2014 or any update of that SHMA.”</p>
PM37	Page 46	<p>In Policy H6, delete “should provide starter homes and demonstrate” and replace with “shall make appropriate”.</p> <p>Delete the second paragraph of Policy H6.</p> <p>In the Justification/Supporting Text, delete sub-paragraph d) (Lifetime Homes 16 criteria).</p> <p>Add the following text:</p> <p>“The level of appropriate provision for the elderly will be judged against the latest available evidence including the SHELMA report, the SHMA 2019 and the Parish Councils’ demographic study.</p> <p>Local Plan Policy HC2 addresses housing mix in Sefton. However, a different mix is required in Formby and Little Altcar. This is to redress the imbalance of a disproportionately high percentage of houses with four or more bedrooms; to meet the needs of an aging population (particularly for one-bedroom properties); also, the demand for two-and three-bedroom homes.”</p>
PM38	Page 47	<p>In Policy H9 a), after “useable”, add “(generally 4m by 6m)”.</p>
PM39	Page 47	<p>In Policy H10, move the content of the second and third bullet points to a Justification/Supporting Text box.</p> <p>Insert the following at the start of the policy:</p> <p>“Residential development should demonstrate the most effective use of land through high quality design that respects</p>

		<p>local character and residential amenity.”</p> <p>Commence the housing policy section with this policy (re-numbered).</p>
PM40	Page 49	<p>In Section 4.4, substitute “Liverpool City Region (LCR)” for LCR. Substitute “Housing Needs Assessment (HNA)” for “HNA”.</p> <p>In the final sentence of Section 4.4, delete “have to” .</p> <p>At the beginning of the Justification/Supporting Text to Policy WS1, add:</p> <p>“The new business park referred to in Policy WS1 is the land subject of Local Plan allocation MN2.49 (Land North of Formby Industrial Estate).</p> <p>Pedestrian crossing facilities would be incorporated into a new signal-controlled junction.”</p> <p>For “SME businesses”, substitute “Small and Medium-Sized Enterprises (SMEs)”.</p>
PM41	Page 49	<p>Add an additional bullet point to Policy WS4: “Shopping parade on the corner of Harington Road and Wicks Green”. Prepare plans showing the extent of the areas identified in the bullet points. Insert within the Plan and cross-reference in the Policy.</p>
PM42	Page 51	<p>Replace Policy GA2 with the following text:</p> <p>“All commercial, employment, leisure and residential developments will be expected to comply with the Council’s Sustainable Travel & Development SPD, June 2018. In line with the SPD, planning applications should be accompanied by a Minimum Accessibility Standard Assessment (MASA) and, for residential applications for more than 25 dwellings, by a Travel Statement and Travel Plan.”</p>
PM43	Page 52	<p>Replace the second paragraph of Policy GA3 with the following: “New residential streets will be designed with regard to the needs of pedestrians, cyclists and other highway users.”</p> <p>At the end of the first sentence of paragraph 3, add “or follow an off-road route”.</p>
PM44	Page 53	<p>Replace the text of Policy CLW1 with the following:</p> <p>“The Parish Councils will work with Sefton Council, developers, community groups and other organisations to find ways of securing the delivery of infrastructure priorities for Formby and Little Altcar including through appropriate</p>

		<p>funding mechanisms.”</p> <p>Delete the text in Section 4.6.</p>
PM45	Page 54	<p>Prepare larger scale plans showing the extent of the areas designated in Policy ESD1 as Local Green Space. Insert within the Plan and cross-reference in the Policy.</p> <p>In Policy ESD1, replace “new development is ruled out other than in very special circumstances” with “development will be managed in a manner consistent with Green Belt policy”.</p>
PM46	Page 57	Delete the second sentence of Policy ESD4.
PM47	Page 57	<p>In the first bullet point in Policy ESD7, insert “net” before “loss”.</p> <p>In the third bullet point, insert “should be replaced” after “development”.</p> <p>In the fifth bullet point, replace “expert” with “professional”.</p> <p>In the final bullet point, change “preserved and enhanced” to “preserved or enhanced”.</p>
PM48	Pages 58 to 63	Replace the content of Pages 59 to 63 with the text set out in Annex B below.

ANNEX A

POLICY TITLES (see PM29)

Policy GP1: Spatial Strategy

Policy H1: Density (Renumbered / Combining H2 and H10)

Policy H2: New Housing (was H1)

Policy H3: Affordable Housing (combining H4 and H5 – former H3 deleted)

Policy H4: Housing Mix (was H6)

Policy H5: Storey Height (was H7)

Policy H6: Off-Road Parking (was H8)

Policy H7: Design of Car Parking (was H9)

Policy WS1: Land North of Formby Industrial Estate

Policy WS2: Retention of Employment Land

Policy WS3: Existing Employment Sites

Policy WS4: Vitality and Viability

Policy WS5: New Shop Fronts

Policy WS6: Signage

Policy GA1: Rights of Way

Policy GA2: Accessibility Audits and Travel Plans

Policy GA3: Provision for Pedestrians and Cyclists

Policy CLW1: Infrastructure Delivery

Policy ESD1: Local Green Space

Policy ESD2: High Quality Design

Policy ESD3: Allotments

Policy ESD4: Renewable Energy

Policy ESD5: Low Energy Consumption Homes

Policy ESD6: Green Infrastructure

Policy ESD7: Trees and Landscape

Flooding Policies – As Annex B

ANNEX B

REPLACEMENT TEXT ON FLOODING (see PM48)

4.8 FLOODING

4.8.1 This section outlines a Flooding Strategy designed to reduce and minimise flood risk for all existing and future residents in Formby and Little Altcar. The best available information on areas at risk of flooding will be used including local knowledge on flooding and sewerage problems. Issues will be dealt with through the determination of planning applications. In addition, using Community Actions, discussions aimed at resolving capacity and maintenance issues will be pursued with the competent authorities.¹

For new development, and in common with Government policy, the main aim will be to avoid inappropriate development in areas at risk of flooding. Inappropriate development will be directed away from areas at highest risk of flooding. This will involve consideration of a Flood Risk Assessment and applying, where necessary, a site specific Sequential Test and an Exceptions Test. All developments shall incorporate measures necessary to avoid any increase in flooding elsewhere.

Given the issue of existing surface water flooding in Formby and Little Altcar, all developments will be expected to include relevant measures aimed at easing on-going problems. Such measures will include reducing and slowing the discharge of surface water from development sites.

Flooding in the Plan area is covered by a comprehensive policy within the Local Plan for Sefton (Policy EQ8, Flood risk and Surface Water). All developments must be determined in accordance with this policy unless material considerations indicate otherwise. The policies set out below highlight matters of particular concern within Formby and Little Altcar and in circumstances where avoiding flood risk is always a better solution than mitigation.

In addition, the evidence base document EB11 (“Flooding Document”) sets out much detailed background information and preferences of the Parish Councils in regard to the design of development proposals. Nevertheless, it is the following policies against which applications will be determined.

Ground conditions and the drainage situation in Formby and Little Altcar are complicated. Applicants are advised to seek specialist advice.

FLOODING POLICIES

Policy F1 – Avoiding Increased Flooding and Flood Risk

In areas at risk of flooding from any source, developments shall not lead to an increase in flooding or increased flood risk on either the application site or elsewhere within the Plan area. Where reasonably practicable, developers shall demonstrate tangible, definite and measurable reductions in flood risk and actual flooding.

¹ This would be a “new” Community Action to address an area of clear concern to residents and the Parish Councils but one that cannot be addressed adequately through land-use policies.

Justification/Supporting Text

“Areas at risk of flooding” are shown on Map X and the related Surface Water Flood Risk Maps. They include the areas within Flood Zones 2 and 3; also, areas with critical drainage problems even though they may fall within Flood Zone 1. However, for all flood zones, reference should be made to the latest plans on the Environment Agency’s website. The defined flood risk areas may change in the future, for example, in recognition of climate change or actual flood events.

Applicants should be aware that there are other sources of flooding, for example, from overflowing sewers and from ground water emergence. Policies in this Plan are designed to minimise related problems. Information on vulnerable areas can be obtained from the competent authorities.

The policy is applicable to all types of development. It applies equally to new green spaces and landscaping where design and construction must recognise the need for a reduced overall level of flood risk. In this regard, trees and other landscape sustainable drainage features can have a role in managing flood risk.

Policy F2 – Flood Risk Assessments and Scheme Design

In accordance with Government guidance, planning applications in areas at risk of flooding shall be informed by a site-specific Flood Risk Assessment (FRA) demonstrating how all sources of flood risk will be managed now and over the lifetime of the development (taking into account, for example, climate change).

Whether as part of the FRA or otherwise, scheme designs shall address the requirements of the Plan’s flooding policies. They shall identify effects on all elements of the drainage system including, but not limited to, foul and surface water sewers, watercourses, water bodies and groundwater.

Justification/Supporting Text

Advice on the carrying out of flood risk assessments is set out in the Government’s Planning Practice Guidance (PPG). Assessments will be required, as advised, in all areas that are defined in this Plan as being at risk of flooding. In Critical Drainage Areas, the requirement will apply to proposals involving sites of 0.5 hectare or more (see the Local Plan for Sefton Policy EQ8). There are exceptions for some minor development and changes of use (see the National Planning Policy Framework (NPPF), Footnote 51).

An FRA prepared in accordance with the advice in PPG will provide evidence for Sefton Council to apply (if necessary) the Sequential Test. In this regard, it will be important to determine whether land with a lower risk of flooding can be found for the proposed development.

Various elements of scheme design are discussed in the evidence base document EB11 (“Flooding Document”) which sets out various non-policy aspirations. These include not building properties at a level lower than the adjacent road or adjacent properties; avoiding the raising of land levels or other changes to natural topography; keeping new highways and footways free of flood risk; discouraging standing bodies of water adjacent to or upstream of developments; avoiding ground water storage systems or drainage by pumping; and discouraging preloading (to expel groundwater).

Policy F3 - Reduced Surface Water Discharge

Developments shall seek to maximise reductions in surface water run-off as compared with the pre-development situation. Designs shall also lead to a reduction in the speed at which surface water discharges from the site.

Justification/Supporting Text

Flooding-related problems are likely to be less intense in circumstances where surface water run-off from a site is reduced and slowed. These measures will help relieve sewer flooding especially in systems that have insufficient capacity to deal with severe rainfall events. Slowing the rate of discharge is also directed at reducing problems associated with the River Alt when water backs up along surface water sewers and leads to associated flooding. Slowing the rate of discharge will reduce pressure on the system and aid return to a state of equilibrium.

Policy F4 –Attenuation Areas

Development will not be permitted in flood attenuation areas where the development would reduce the ability of the area to alleviate flooding.

Justification/Supporting Text

Certain areas are meant to store water at times of flood or excessive run-off. If development were to take place in such areas, the ability to store water would be reduced and water would be displaced elsewhere, transferring the flooding problem. Therefore, development is precluded in these circumstances. The competent authorities will assist in identifying attenuation areas.

Attenuation areas are often akin to (and may form part of) Flood Zones 3a and 3b. There are limited instances where compatible development could be acceptable, subject to conditions (see PPG (Guidance on Flood risk and coastal change, Paragraphs: 066 and 067)).

Policy F5 – Reduced Discharges to Combined Sewers

Developments shall seek to maximise reductions in discharges to combined sewers as compared with the pre-development situation.

Justification/Supporting Text

From time to time, combined sewers in the Plan area are overloaded and result in flooding problems when related overflows occur. Discharges to combined sewers can be reduced by measures that include water harvesting and recycling, the incorporation of soakaways where ground conditions permit and, where practicable, the use of sustainable drainage systems (which are positively encouraged).