

# Planning Committee

14 October 2022

Agenda item number 10

## Updated National Flood Risk Guidance and our Flood Risk SPD

Report by Planning Policy Officer

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### Summary

In August 2022, the Flood Risk section of the National Planning Policy Guidance (NPPG) was updated. Officers checked the NPPG changes against the adopted Flood Risk Supplementary Planning Document (SPD) and found some areas where an agreed way forward is required. An addendum to the Flood Risk SPD has been produced.

### Recommendation

Planning Committee endorse the addendum to the SPD as a pragmatic way of addressing the changes to the Flood Risk NPPG that are relevant to the Flood Risk SPD.

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## 1. Introduction

- 1.1. In August 2022, the Flood Risk section of the NPPG was updated. The new NPPG can be found here: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- 1.2. The Broads Authority have an adopted Flood Risk Supplementary Planning Document (SPD): [Broads Flood Risk SPD 2020 \(pdf | broads-authority.gov.uk\)](https://broads-authority.gov.uk)
- 1.3. Officers went through the new version of the Flood Risk NPPG and checked it against the adopted Flood Risk SPD. There are some areas of the Flood Risk SPD which are slightly different to the new Flood Risk NPPG.
- 1.4. The Addendum in Appendix 1 highlights the changes to the NPPG which are relevant to the Flood Risk SPD, and states how we will address the changes.
- 1.5. This addendum is a pragmatic approach to addressing the changes of the NPPG.

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Appendix 1 – Addendum to the Flood Risk SPD OCT 2022



## **Addendum to the Flood Risk SPD**

**To reflect NPPG changes**

**October 2022**

### **1. Introduction**

- 1.1. In August 2022, the Flood Risk section of the NPPG was updated.
- 1.2. The new NPPG can be found here: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>
- 1.3. The Planning Team of the Broads Authority have compared the old version of the NPPG with the new version to create a [comparison of old v new NPPG flood risk \(draftable.com\)](#)

### **2. Flood Risk SPD**

- 2.1. The Broads Authority have an adopted [Flood Risk Supplementary Planning Document \(SPD\) \(broads-authority.gov.uk\)](#)
- 2.2. Officers went through the new version of the Flood Risk NPPG and checked the changes against the adopted Flood Risk SPD. There are some areas of the Flood Risk SPD which are slightly different to the new Flood Risk NPPG.
- 2.3. This Addendum highlights which changes to the Flood Risk NPPG are relevant to the Flood Risk SPD and states how we will address the changes.
- 2.4. Please note that the Flood Risk SPD elaborates on local and national policy. The NPPG, NPPF, Local Plan and SPD are all used in determining planning applications. All relevant changes to the NPPG will be considered when determining applications.

### 3. August 2022 Flood Risk NPPG and flood risk SPD comparison

<b>Topic</b>	<b>Flood Risk SPD</b>	<b>Flood Risk NPPG</b>	<b>Commentary</b>	<b>Action</b>
Reasonably available	Section 6.5.5 and 6.5.6. The SPD provides guidance on when a site is deemed reasonably available.	Some additional text relating to a site being reasonably available.	It is not considered that the changes affect the SPD, but add to what needs to be considered in terms of a site being reasonably available.	Carry on using the SPD guidance, combined with the NPPG.
Area of search	Section 6.5.7, 6.5.8, 6.5.9. The SPD provides guidance on the area of search relevant to the Broads.	Some additional text relating to area of search.	It is not considered that the changes affect the SPD, but add to what needs to be considered in terms of the area of search.	Carry on using the SPD guidance, combined with the NPPG.
Wider sustainability benefits	Section 6.6.4. The SPD refers to the Sustainability Appraisal Objectives used when producing a Local Plan.	Refers to using Sustainability Appraisal Objectives, but also gives some specific examples like if a scheme uses brownfield land or would reduce flood risk to the wider community.	It is not considered that the changes affect the SPD, but add to what needs to be considered in terms of the wider sustainability benefits.	Carry on using the SPD guidance, combined with the NPPG.

<b>Topic</b>	<b>Flood Risk SPD</b>	<b>Flood Risk NPPG</b>	<b>Commentary</b>	<b>Action</b>
Lifetime of development	Section 6.6.5. The SPD says 100 years for residential and requires developers to set out the anticipated lifetime of non-residential development and justify this.	Residential development can be assumed to have a lifetime of at least 100 years, unless there is specific justification for considering a different period.  The lifetime of a non-residential development depends on the characteristics of that development but a period of at least 75 years is likely to form a starting point for assessment.	The changes to the NPPG are quite different to the SPD.	Use the lifetime of development as set out in the NPPG and not the Flood Risk SPD.
Residual risk	6.10.7. The SPD refers to residual risk in a few places.	The NPPG introduces much new text in relation to residual risk.	It is not considered that the changes affect the SPD, but add to what needs to be considered in terms of residual risk.	Carry on using the SPD guidance, combined with the NPPG.

#### **4. This addendum**

This addendum is a pragmatic approach to addressing the changes of the NPPG. Whilst it has not been consulted on, it has been endorsed by Planning Committee.