

# Broads Authority

25 September 2020

Agenda item number 11

## Joint Position Statement with the Environment Agency on Strategic Flood Risk Assessments

Report by Planning Policy Officer

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### Summary

A Joint Position Statement on Strategic Flood Risk Assessments was produced to support the progress of the Local Plan for the Broads. Since that time a number of things have changed, and an updated Joint Position Statement has been agreed with the Environment Agency.

### Recommendation

Adoption of the amended Joint Position Statement on Strategic Flood Risk Assessments.

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## 1. Introduction

- 1.1. To support the progress of the Local Plan for the Broads and explain the reasoning behind certain approaches, the Broads Authority worked with the Environment Agency to produce a Joint Position Statement on Strategic Flood Risk Assessments. Some time has passed since the original Statement was produced, and things have changed. The Statement has therefore been amended, as set out in this report.
- 1.2. The Joint Position Statement was presented to the Planning Committee in August 2020. The Committee endorsed the Statement and recommended it to the Broads Authority for adoption.

## 2. Strategic Flood Risk Assessments

- 2.1. The National Planning Policy Framework (NPPF) says that 'Local Plans should be supported by a Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards.'
- 2.2. The National Planning Policy Guidance (NPPG) defines a Strategic Flood Risk Assessment (SFRA) as 'a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk'.

- 2.3. The Broads Authority Executive Area is covered by four SFRAs<sup>1</sup>, produced in 2017 and 2018.
- 2.4. SFRAs are produced mainly to support Local Plans. As they identify areas of land in Flood Zones 3a and 3b they are also useful in helping to understand flood risk related to development, although further flood risk work tends to be required as further detail for some planning applications.
- 2.5. The NPPG defines the flood zones as follows:

Zone 1 Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

- 2.6. The SFRAs are now out of date, but are still useful in understanding what the flood risk could be at a particular site. The flood maps for planning<sup>2</sup>, produced and maintained by the Environment Agency, are updated regularly, but this mapping system does not delineate Flood Zone 3a and 3b. Therefore, the SFRAs and the flood maps for planning are used together to give an idea of what flood risk could be at a particular site. This is part of the update to the Joint Position Statement, and the Environment Agency agrees with this approach.

### 3. Original Joint Position Statement

- 3.1. The purpose of the original Joint Position Statement was to support the Local Plan for the Broads and help it progress up to and through examination.
- 3.2. Because the timing of the SFRA for the former Waveney area was slightly behind the Norfolk SFRAs, and to help us progress our Local Plan, the Joint Position Statement was produced to say that until the Waveney SFRA was finalised we could use the findings of the Norfolk SFRAs, which touched on part of the Waveney area.

<sup>1</sup> SFRAs: <https://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

<sup>2</sup> Flood Maps for planning: <https://flood-map-for-planning.service.gov.uk/>

- 3.3. In addition, as parts of the areas covered by the SFRAs did not have any modelling or up to date modelling the SFRAs, in agreement with the Local Planning Authorities and the Environment Agency, took a precautionary approach and said that these areas were treated as indicative Flood Zone 3b. One particularly large area that did not have an up to date model was the area covered by the Broadland Flood Alleviation Project (BFAP). The Joint Position Statement covers this issue.

## **4. Amendments to the Joint Position Statement**

- 4.1. The amended Joint Position Statement is at Appendix 1. Changes are marked on the document and are summarised as follows. These amendments have been agreed with the Environment Agency.

- The tense has been changed as the Local Plan has been adopted and the SFRA that covers the former Waveney area was completed in 2018.
- The approach to using both the SFRAs and the flood maps for planning is agreed in the Statement.
- Updates are made to the BFAP and modelling, with reference to the Broadland Futures Initiative.

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Appendix 1 – Strategic Flood Risk Assessment Position Statement produced by the Broads Authority and the Environment Agency



**Strategic Flood Risk Assessment Position Statement**  
**Produced by the Broads Authority and the Environment Agency**

~~July 2018~~ **Updated July 2020**

1. Introduction

- 1.1. The NPPF says *'Local Plans should be supported by a Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards'*.
- 1.2. The NPPG defines a Strategic Flood Risk Assessment (SFRA) as *'a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk'*.
- 1.3. The NPPG goes on to say that Local Planning Authorities should use the SFRA to:
  - *'determine the variations in risk from all sources of flooding across their areas, and also the risks to and from surrounding areas in the same flood catchment;*
  - *inform the sustainability appraisal of the Local Plan, so that flood risk is fully taken into account when considering allocation options and in the preparation of plan policies, including policies for flood risk management to ensure that flood risk is not increased;*
  - *apply the Sequential Test and, where necessary, the Exception Test when determining land use allocations;*
  - *identify the requirements for site-specific flood risk assessments in particular locations, including those at risk from sources other than river and sea flooding;*
  - *determine the acceptability of flood risk in relation to emergency planning capability;*
  - *consider opportunities to reduce flood risk to existing communities and developments through better management of surface water, provision for conveyance and of storage for flood water'*.
- 1.4. The SFRA provides more detail than the Environment Agency Flood Map for Planning. For example, the ~~current~~ previous Broads SFRA modelled overtopping of the flood defences so it shows ~~ed~~ s actual flood risk, based on data available at the time of assessment, whereas the defined flood zones don't take account of any defences. The ~~current~~ previous Broads SFRA also includes ~~ed~~ s the effects of a breach in terms of likely hazard at a predetermined coastal location, shows ~~ed~~ s areas of Functional Floodplain (flood zone 3b), and indicates ~~ed~~ s how climate change is likely to lead to an increase flood risk.
- 1.5. SFRAs are very important when preparing a Local Plan as well as when determining Planning Applications.
- 1.6. This ~~original~~ original Position Paper (~~2018~~ 2018) ~~seeks to explain~~ explained the SFRA situation as it relates to the Broads Authority Executive Area and the production of the Broads Local Plan. This minor update reflects progress on the modelling of the area.

## 2. Strategic Flood Risk Assessment 2018 update

- 2.1. SFRA's for Broadland, South Norfolk, Norwich, Great Yarmouth and North Norfolk have been produced and are adopted and can be found here: <http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>
- 2.2. At the time of writing, Waveney District Council were finalising their SFRA which will be of relevance to the Broads. Update: Waveney SFRA was completed in 2018.  
<https://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

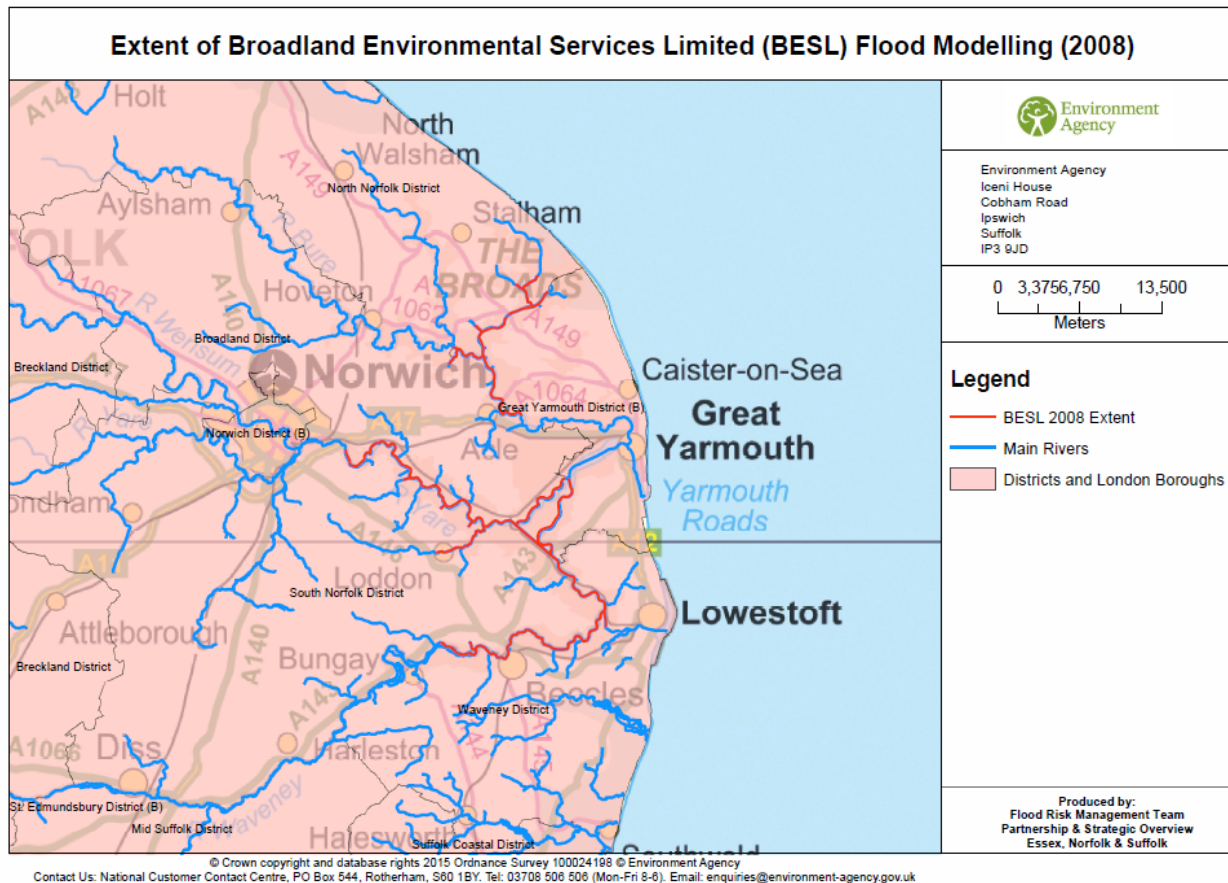
~~Until the Waveney SFRA is in place and adopted, the Environment Agency has agreed that the Broads Authority will use the Norfolk SFRA's that provide information for the Waveney part of the Broads. Those submitting planning applications will also be advised to follow this approach. To reflect that the SRAs have been completed, but the Environment Agency maps for flooding are updated periodically, the SFRA's and EA Flood Maps for Planning will both be used when considering planning applications.~~

## 3. The 'BESL' model

- 3.1. When compiling the Project Brief for updating the Norfolk SFRA's and assessing the status of the flood risk models which the consultant would need to use to produce the SFRA's, it became obvious that there was an issue with a model that covered a large area of Norfolk, centred mainly on the Broads.
- 3.2. The model in question is the 'Broads BESL model'. BESL stands for Broadland Environment Services Limited. This organisation was commissioned by the Environment Agency to deliver the Broadland Flood Alleviation Project which is a 20-year programme of flood defence improvement and maintenance works in the Norfolk and Suffolk Broads<sup>1</sup>.
- 3.3. ~~At the time of writing, the model is not owned by the Environment Agency, but it will be transferred in due course. The model however requires further work to enable it to inform an SFRA.~~ The model is now owned by the Environment Agency and work is being undertaken to update it to inform the SFRA.
- 3.4. The area that is covered by the BESL model is shown in red on the following map. It can be seen that a large area of the Broads is covered by this model and therefore was not assessed as part of the current SFRA updates (both the Norfolk SFRA's and the ~~Waveney~~ SFRA for the former Waveney area, now East Suffolk).

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<sup>1</sup> <http://bfap.org.uk/>



#### 4. The agreed way forward

4.1. The following way forward has been agreed with the Environment Agency.

~~4.2. The Environment Agency intend to obtain the BESL model and intend to have it updated by the end of 2021. They will run the model to effectively produce an equivalent to the SFRA level 1 information.~~

4.3.4.2. The current SFRA for Norfolk and for the former Waveney area, now East Suffolk provides updated SFRA information for the parts of the Broads not covered by the BESL model. In Norfolk, for the parts of the Broads covered by the BESL area, a precautionary approach is taken whereby the high risk flood zone (Flood Zone 3) is classed wholly as 'indicative Flood Zone 3b – functional floodplain'. This means that applications within this area will require a site-specific flood risk assessment to confirm the nature of the flood risk to the site and ensure that only appropriate development is considered. The Waveney (now East Suffolk) SFRA adopts a similar approach, with the Report section making clear that Flood Zone 3 should be considered as Flood Zone 3b where there is not detailed modelling available.

#### 5. Broadland Futures Initiative

5.1. The Environment Agency are currently updating the Broadland Environmental Services Limited (BESL) modelling as part of the Broadland Futures Initiative (BFI). The information required to inform the SFRA will be produced as part of this project. It is intended that this work will be completed sometime after 2021. Once the model has been updated the Environment Agency will supply the relevant outputs to the Broads Authority and other affected planning authorities so the SFRA and its mapping can be updated.

## 5.6. Summary and Conclusions

5.1.6.1. SFRA's are very important for the production of Local Plans. There are updated SFRA's for most of Norfolk together and ~~work is nearing completion~~ for the Waveney area (~~now East Suffolk~~). However a large area of the Broads ~~will was~~ not ~~be~~ assessed in detail as part of this work because the BESL model neededs to be updated by the Environment Agency and the model run to produce SFRA equivalent information ~~by around the end of 2021.~~

5.2.6.2. The timing of the work means that the SFRA's that cover the Broads do not have modelled data to inform the BESL area. As such, the Local Plan for the Broads ~~will be was~~ examined and ~~potentially~~ adopted without a fully detailed SFRA in place for the entire area (as the BESL model will not be ready to use in an SFRA until ~~after~~ 2021).

5.3.6.3. The lack of an updated SFRA for much of the Broads has not held back or affected the Local Plan for the Broads for the following reasons:

- a) A suitable and pragmatic way forward ~~has been was~~ agreed with the Environment Agency – that a precautionary approach will be used in Norfolk and in Suffolk<sup>2</sup> where detailed flood modelling is not currently available.
- b) More fundamentally, the majority of the Broads is at risk of flooding and so flood risk is a usual constraint which development in the Broads is required to address at the application stage through a site specific Flood Risk Assessment.
- c) The Local Plan policies and adopted Flood Risk SPD continue to provide detail on the flood risk characteristics of the Broads and the approach required from those promoting development.
- d) Typically, a Level 1 SFRA helps Local Planning Authorities identify areas of differing flood risk across a district to inform choices about allocating growth. In the case of the Broads that is possibly less of an issue because the extent of flooding limits opportunities to place development in areas of low flood risk, meaning that a more detailed consideration will always be required, and the levels of growth/development required are much less than for other local planning authorities.
- e) A Sequential Test for the sites allocated for development ~~has been was~~ produced in liaison with the Environment Agency, using the Environment Agency flood risk information.

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<sup>2</sup> The Waveney and Suffolk Coastal, ~~now East Suffolk~~, approach is similar to the Norfolk SFRA for Flood Zone 3b. They state within the SFRA report that FZ3 should be used as 3b where there is not detailed modelling available. The only difference is that this is not mapped as 'indicative 3b' but just as FZ3.