

# Planning Committee

06 March 2020

Agenda item number 11

## Flood Risk Supplementary Planning Document for adoption

Report by Planning Policy Officer

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### Purpose

The Flood Risk Supplementary Planning Document (SPD) was adopted in 2017. Following the adoption of the Local Plan for the Broads in May 2019, the SPD is being reviewed and updated. The SPD has been subject to two rounds of public consultation.

### Recommended decision

That Planning Committee endorse the Flood Risk SPD and recommend that it is adopted by the Broads Authority.

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## 1. Introduction

- 1.1. The Local Plan for the Broads was adopted in May 2019, and the Broads Authority is now looking in more detail into the interpretation and implementation of its policies.
- 1.2. The Flood Risk Supplementary Planning Document (SPD) was adopted in 2017. Under the new Local Plan this SPD is out of date, and is acting as a guide rather than a supplementary planning document. We are therefore reviewing and updating the SPD.
- 1.3. The end date for the second consultation on the SPD is 4 March at 4pm. It is intended that soon after that date, the comments received and the proposed responses to these comments, as well as an amended SPD will be sent to Planning Committee Members and put on the website. This is with the aim of the SPD being considered for adoption at the March Broads Authority meeting, rather than the May 2020 one.

## 2. Flood Risk Supplementary Planning Document

- 2.1. The NPPG states that: 'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are, however, a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development. Regulations 11 to 16 of the Town and Country Planning (Local Planning)

(England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents. In exceptional circumstances, a Strategic Environmental Assessment (SEA) may be required when producing a Supplementary Planning Document.'

- 2.2. A full SEA of the Flood Risk SPD has not been completed, reflecting the responses from the Consultation Bodies. The responses to the SEA screening request are in the [Consultation: Flood Risk Supplementary Planning Document \(SPD\) report](#) to Planning Committee on 13 September 2019. No comments were received on the SEA Assessment during the first consultation period and therefore no changes have been made.
- 2.3. The draft SPD was subject to first stage public consultation for 8 weeks from 27 September to 22 November 2019. The responses received are in Appendix 1.
- 2.4. The draft SPD was amended to reflect responses from the first round of consultation before being subject to a second round of consultation between 31 January and 4 March 2020. In the interest of expediency in adopting the SPD and because the deadline for comments was after the deadline for the Planning Committee papers, the responses received as part of the second consultation, as well as additional proposed changes to the SPD, will be reported to Planning Committee verbally.

### 3. Conclusion

- 3.1. The SPD has been consulted on twice, with comments read, responded to and amendments made where relevant.
- 3.2. It is recommended that Planning Committee endorse the final SPD and recommend that it is adopted by Full Authority.
- 3.3. As and when it is adopted, we will undertake the remaining stages of producing a SPD as required by the regulations. The changes that are marked in the SPD will be accepted and the SPD formatted before being placed on the website and used in determining planning applications.

Author: Natalie Beal

Date of report: 31 January 2020

[Broads Plan](#) objectives

Appendix 1 – Comments received as part of the first round of consultation

## Appendix 1 – Comments received as part of the first round of consultation

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#1	Laura Waters	Norfolk County Council	On 3rd January this year we responded directly to Natalie Beal on the Broads SPD as consulted on at the time. Elaine Simpson had various short comments to make on the document and we welcome that these comments have been included/utilised in the current document. Having had this opportunity to review the most recent consultation, as LLFA, we have no further comments to make on the SPD.	Support noted.	No change to Flood Risk SPD
#2	Lorraine Houseago	Norfolk County Council	We have no other comments to make.	Noted.	No change to Flood Risk SPD
#3	Nathan Makwana	Anglian Water Services	Having previously had the opportunity to comment and be involved on the development of the previous draft, I note that this iteration incorporates previously suggested comments. On this basis, Anglian Water have no further comment to make. We of course welcome any further opportunity to comment.	Support noted.	No change to Flood Risk SPD
#4	Penny Turner	Norfolk Policy ACLO	We have no comments on the above at this stage.	Noted.	No change to Flood Risk SPD
#5	Charlette Hounsell	Norwich City Council	Section 6.2 – it may be useful to reference in this section that consultation with neighbouring/overlapping authorities at pre-application stage is advised	Agree. Will incorporate into SPD.	<a href="#">6.2.2 It will also be appropriate to consult neighbouring Local Planning Authorities if scheme proposals are on or near to the border.</a>
#6	Charlette Hounsell	Norwich City Council	Section 6.5.5 – in setting out what should be considered for a site to be reasonably available, there is no mention of site ownership or whether the owners of sites have any intention of them being developed. If owners of sites have no intention of developing them, can they be considered as reasonably available sites?	This is covered to some extent by the first bullet point, but we will expand this to address this comment.	6.5.5 A site is considered to be reasonably available if all of the following apply: <ul style="list-style-type: none"> <li>The site is available to be developed (<a href="#">including considering site ownership or whether the owners of sites have any intention of them being developed</a>);</li> </ul>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#7	Charlette Hounsell	Norwich City Council	Section 6.5.9 & Section 7.1.3 – Suggest inclusion of reference to the need to comply with relevant planning policies of any relevant local authorities to the development site/proposal	Noted. This is a given, but we have added some text.	6.5.9 It is acknowledged that the area of search could be outside of the Broads Authority Executive Area and would require discussions with other Local Planning Authorities ( <a href="#">and proposals would therefore need to comply with relevant planning policies of the relevant Local Planning Authorities</a> ).  7.1.3 It should be noted that all aspects of the development need to comply with policies of the Local Plan (adopted 2019) and that conformity with policies SP2 and DM5 does not override applicability of other policies ( <a href="#">of the Broads Authority and other relevant Local Planning Authority</a> ).
#8	Charlette Hounsell	Norwich City Council	Section 6.10.6 – The last sentence of this paragraph refers to flood resistance and resilience of buildings information to be found at section 5. I believe this information is found at section 7.	Agreed.	Change from 5 to 7
#9	Charlette Hounsell	Norwich City Council	Section 9 – Suggest inclusion of web links to local authorities and LLFAs	It is not clear what links are required. The changes to the SPD as a result of other comments from Charlotte may help raise awareness of other LPAs.	No change to SPD.
#10	Charlette Hounsell	Norwich City Council	Does this document take account of ADEPT and EA Flood Risk Emergency Plans for New Development guidance? <a href="https://www.adeptnet.org.uk/floodriskemergencyplan">https://www.adeptnet.org.uk/floodriskemergencyplan</a>	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#11	Charlette Hounsell	Norwich City Council	Part of utilities site is within Broads Authority area and adjacent to the East Norwich Area as defined in JCS 12 – should there be some reference to this?	The issue of cross boundary sites (which after clarification with Charlotte was what this comment sought to address) is covered by the other changes to the comments from Charlotte.	No change to SPD.

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#12		Marine Management Organisation	<p>Page 16, Section 5.5.4: Refers to the tidal influence within the Broads, as well as the National Planning Policy Framework. We would also recommend you mention the East Inshore and East Offshore Marine Plans here, or elsewhere in section 5.5.</p> <p>Asked for clarification: As these are recommendations, I am not able to provide specific text. We suggest that your own interpretation of the East Marine Plans informs your plans, and refer to the Marine Plans where you deem appropriate. Coastal, and tidal flooding is covered across multiple policies within the East Marine Plans such as SOC1, CC1 and Objectives 6 and 9. Other signposting includes Paragraph 249 –Coastal change management.</p>	Noted and we will include some text.	<a href="#">5.4 Marine Management Organisation and flood risk</a> <a href="#">5.4.1 Coastal, and tidal flooding is covered across multiple policies within the East Marine Inshore and Off Shore Plans such as SOC1, CC1 and Objectives 6 and 9. Other references include Paragraph 249 – Coastal change management.</a>
#13		Marine Management Organisation	<p>Page 67: You refer to Environment Agency permits. It may also be appropriate to refer to Marine Licences from the Marine Management Organisation, as this may be relevant to applicants.</p> <p>Asked for clarification: With regards to referencing the Marine Management Organisations Marine Licences, lines 1552-1556 refer to the appropriate requirements for a “a permit under the Environmental Permitting 1554 (England and Wales) Regulations 2010 from the Environment Agency”. As there are exemptions, particularly within the Broads, I cannot suggest specific text. However, as this is directed at applicants this seems to be an appropriate place to note that a Marine Licence may be required for works that are carried out on tidal rivers.</p>	Noted and we will include some text.	As requested, we will add this to the Flood Risk Tick Sheet: <a href="#">Also note that a Marine Management Organisation Marine Licence may be required for works that are carried out on tidal rivers.</a>
#14	Ben Wright	East Suffolk	Para 5.4.2 refers to the Waveney SFRA (2018). This SFRA was produced for both Councils and may be better referred to as the East Suffolk SFRA.	Agree - will change text.	Change to say 'East Coast'.
#15	Ben Wright	East Suffolk	Para 5.4.3 refers to Waveney. This reference should be changed to “the former Waveney area”.	Agree - will change text.	Change to say 'the Waveney part of East Suffolk'
#16	Ben Wright	East Suffolk	Para 5.4.4 – the joint statement with the EA continually refers to Waveney. This should be changed to either East Suffolk or the former Waveney area.	Noted and that is because it was produced in 2018. It is not proposed to go through all old documents adopted put in place before April 2019 to change the refence. But as and when documents like this are updated then we will make the amendment.	No change to Flood Risk SPD

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#17	Jessica Nobbs	Water Management Alliance	<p>Section 8.3.5 of the document refers to Land Drainage Consent. It is identified that consent would be required from the relevant Internal Drainage Board (IDB) where alterations to a watercourse (including infilling, culverting or amending) are proposed as per the Board's Byelaws (specifically Byelaw 4) and Section 23, Land Drainage Act 1991. In addition to this, we feel it would be relevant to refer to other consents that may be required from the Board by including the two following statements:</p> <ul style="list-style-type: none"> <li>- If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.</li> <li>- If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).</li> </ul>	Noted and will amend text.	<p><u>Other consents that may be required from the IDB include:</u></p> <ul style="list-style-type: none"> <li>• <u>If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.</u></li> <li>• <u>If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).</u></li> </ul>
#18	Jessica Nobbs	Water Management Alliance	<p>Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available here and here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse).</p>	Noted and will amend text.	<p><u>4.8.4 Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available here and here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse</u></p>
#19	Liam Robson	Environment Agency	<p>In relation to paragraph 5.5.8 it should be noted that Environment Agency flood warnings cover both tidal and fluvial flooding.</p>	Noted and will amend text.	<p>Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning <u>(for fluvial and tidal flooding).</u></p>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#20	Liam Robson	Environment Agency	Paragraph 5.5.9 states the standard of protection in the Broads area. It should be noted that some defences have a 1 in 200 standard or higher.	Noted and will amend text.	5.6.9 Existing flood defences in the Broads area offer a low standard of protection (typically up to a 1 in 7-year standard <u>and some defences have a 1 in 200 standard or higher</u> ), so they may be overtopped during a flood event.
#21	Liam Robson	Environment Agency	The tidal flood risk section of this document states that "...the prior has defences to protect up to the 0.5% annual probability tidal flood". It should be noted that not all defences may be up to this standard.	Noted, although this was copied verbatim from the SFRA. Will amend text.	There is acute risk of tidal flooding in Great Yarmouth and across the Broads within the study area; the prior has defences to protect up to the 0.5% annual probability tidal flood ( <u>although not all defences may be up to this standard</u> ).
#22	Liam Robson	Environment Agency	The fluvial section of this table states how climate change will significantly influence the predicted flood levels as a consequence of changes to mean sea level. As this is in the fluvial section, it should mention climate change increasing river flows (between 25% and 65% increase).	Noted, but that is the fluvial column in a few tables, not just Great Yarmouth's. In the absence of a suggestion that addresses all of the tables, some text will be added to section 4.1.	4.1.1 Fluvial flood risk is flooding from rivers because of a river overflowing or its banks being breached. <u>It should be noted that climate change is likely to result in increased river flows (between 25% and 65% increase)</u>
#23	Liam Robson	Environment Agency	It is good to see the inclusion of paragraph 6.3.2 however, it is unclear that this is the only flood risk issue mentioned in detail in this summary section. This could therefore be moved to a more detailed section. Section 7.6.1 would be best, as it links to the need to let water in and adopt flood resilient construction measures if more than 600mm of water around the building.	Agree. Will move text.	6.3.2 moved to 7.6.1.
#24	Liam Robson	Environment Agency	In relation to point i in paragraph 6.10.3, the FRA should show the accurate location of the flood zones on their site based on a comparison of EA flood levels and GPS site survey, not just using our flood maps.	Noted and will amend text.	i. Flood risk zones 1 – 3 within the site with reference to the SFRA/EA Flood Zone maps. <u>The FRA should show the accurate location of the flood zones on the site based on a comparison of EA flood levels and GPS site survey;</u>
#25	Liam Robson	Environment Agency	It appears that the document states that what is considered to be safe will be taken on a case-by-case basis. You may want to consider further what safe specifically looks like.	EA were asked for their thoughts about what safe would look like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#26	Liam Robson	Environment Agency	The mention of whether less vulnerable development at risk of flooding would be safe seems to indicate that you will not allow more vulnerable to flood. The SPD could therefore be enhanced by explicitly saying this as we require more vulnerable flood levels to be above actual risk 1%/0.5 cc flood levels (unless replacement dwellings). It should probably be under 6.10.5, could be under 6.10.6 but does not relate to residual risk, just actual risk. Perhaps a new paragraph between the two referring to the need for new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through defences, raised land or raised floor levels.	Noted. Will add a new paragraph	<a href="#">6.10.6 It is important to note that the Environment Agency need new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through the provision of defences, raised land or raised floor levels.</a>
#27	Liam Robson	Environment Agency	In terms of safe refuge, we require all more vulnerable developments to have safe refuge above the extreme climate change flood level, unless agreed in consultation with emergency planners that it can be made safe through a flood response plan without refuge. It could be beneficial if the SPD were to have comments on refuge requirements e.g. are stairwells acceptable and when is refuge required?	Asked for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked for their thoughts about if stairwells are acceptable and when a refuge is required but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#28	Liam Robson	Environment Agency	Paragraph 6.11.3 states that a Flood Risk Assessment should propose mitigation measures. These should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development.	Noted and will amend text.	6.11.3 A Flood Risk Assessment should consider whether this will happen and propose mitigation measures <a href="#">which should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development</a> . These may include for example the provision of compensatory floodplain storage, <del>although this can be difficult to achieve in the Broads area.</del> <a href="#">Compensatory floodplain storage is the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is</a>
#29	Liam Robson	Environment Agency	Paragraph 6.11.3 also references compensatory storage. It would be beneficial to define what compensatory storage is here i.e. the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is difficult to achieve in the Broads as the floodplain is very flat with little higher land available to lower.	Noted and will amend text.	

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#30	Liam Robson	Environment Agency	Paragraph 6.11.3 also includes a sentence which states “such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood”. This is not compensatory storage and is instead providing a void under the building to reduce the volume of flood storage removed. There should therefore be a sentence before this one saying that ‘one of the only options in the Broads is the raising of buildings on stilts to provide voids underneath and not remove flood storage’.	Noted and will amend text.	<u>difficult to achieve in the Broads as the floodplain is very flat with little higher land available to lower. One of the only options in the Broads is the raising of buildings on stilts to provide voids underneath and not remove flood storage.</u> Such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood. This would require intermittent boarding, no storage under the building and regular maintenance.
#31	Liam Robson	Environment Agency	The Flood Response Plan may be one aspect of the proposed management measures that make a development safe and acceptable in flood risk terms. So the development might not be acceptable terms until the Flood Response plan is submitted and considered.	Noted.	No change to Flood Risk SPD
#32	Liam Robson	Environment Agency	The Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have produced some joint guidance on flood risk emergency plans for new development which can be downloaded at <a href="https://www.adeptnet.org.uk/floodriskemergencyplan">https://www.adeptnet.org.uk/floodriskemergencyplan</a> . The SPD should ensure that it follows the requirements.	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#33	Liam Robson	Environment Agency	<b>Raising Floor Levels</b> In relation to paragraph 7.2.3; we require raised floor levels (above 1% cc/0.5% cc) for residential building conversions, unless it is confirmed in consultation with emergency planners that the safety of the development can be managed through other means such as resilience/resistance measures and flood response plan. It could be beneficial if the SPD specifies when this would be acceptable and when raised floor levels required?	Asked for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked what specific changes they would like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#34	Liam Robson	Environment Agency	In terms of paragraph 7.2.4 We require the finished floor levels of new residential development to be above the actual risk design flood level including 100 years of climate change (1% fluvial plus cc / 0.5% tidal plus cc). We also require higher refuge above the extreme 0.1% cc flood level, unless in consultation with emergency planners that the development can be safe without higher refuge through evacuation and the Flood Response Plan. The SPD could therefore be enhanced by specifying when higher refuge is required.	Asked for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked what specific changes they would like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#35	Liam Robson	Environment Agency	Please note the sentence for citation 50 at the bottom of the page under line 962 is incomplete.	It is, it just is on the next page.	No change to Flood Risk SPD
#36	Liam Robson	Environment Agency	Environment Agency This paragraph states the Agency has principle responsibility for river flooding. This should also state tidal/coastal flooding.	Noted and will amend text.	The Agency has principle responsibility for river, <a href="#">tidal and coastal</a> flooding.
#37	Liam Robson	Environment Agency	Chapter 1: Flood Response Plan Guidance The Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have produced some joint guidance on flood risk emergency plans for new development which can be downloaded at <a href="https://www.adeptnet.org.uk/floodriskemergencyplan">https://www.adeptnet.org.uk/floodriskemergencyplan</a> . This appendix should ensure that it follows the requirements of the ADEPT guidance. The ADEPT guidance goes into more detail on how information on safe access routes and refuge provision should be included in the Emergency Plan, perhaps some of this can be included? But the minimum is to ensure the ADEPT guidance is referenced in Appendix D.	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#38	Liam Robson	Environment Agency	Introduction Line 1264 states that "...if not submitted with an application, are often required by planning condition if permission is issue". ADEPT guidance says this is not allowed, the Flood Response Plan needs to be submitted upfront, as it is necessary to determine the safety of the development.	Noted and will amend text.	This guidance has been produced to assist with the preparation of Flood Response Plans (FRP). FRPs <b>should need to</b> be provided as part of a Flood Risk Assessment where this is necessary to accompany a planning application or, if not submitted with an application, are often required by planning condition if permission is issued.
#39	Charlie Middleton	Beccles Town Council	The Planning Committee, replying on behalf of Beccles Town Council, consider all three documents provide comprehensive support for the planning policies of the Broads Authority.	Support noted.	No change to SPD

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#40	Iain Withington	North Norfolk District Council	Section 5.1.1 and 5.2.1: Could usefully insert into both paragraphs text around Climate change flood extents, that are incorporated in the SFRA and that development should also have regard to these food risk extents from all sources of flooding.	Noted and will amend text.	Add this text to 5.1.1: <u>Development should also have regard to the climate change flood extents (from all sources of flooding) and these are mapped in the Strategic Flood Risk Assessment (see 5.5).</u> Add this text to 5.1.2: <u>As mentioned previously, the impact of climate change needs to be considered (see 5.1.1)</u>
#41	Iain Withington	North Norfolk District Council	5.3: CC flood extents are mentioned here but greater emphasis that the SFRA demonstrates the CC flood extents and these should also be used as a basis for further comment and assessment i.e. through site specific FRAs	Noted and will amend text.	Add this text to 5.3.1: <u>(and the SFRAs demonstrate the climate change flood extents).</u>
#42	Iain Withington	North Norfolk District Council	5.4.1: Could use the wording climate change flood extents rather than impacts	Noted and will amend text.	Change to say: they consider the <del>impacts of</del> climate change <u>flood extents</u>
#43	Iain Withington	North Norfolk District Council	5.4.3: Could mention that CC allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities	Noted and will amend text.	Add: <u>In Norfolk, climate change allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities.</u>
#44	Iain Withington	North Norfolk District Council	5.4.4: Add text around the precautionary approach adopted by the SFRA and expected time line for the updated modelling rather than as time goes by wording.	Noted and will amend text.	Amend text as follows: <u>If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site specific Flood Risk Assessment to define and confirm the extent of Flood Zone 3b. This may require detailed hydraulic modelling. <del>so a site-specific flood risk assessment is required to assess actual flood risk to the site.</del></u> To cover this, a joint position statement has been produced between the Broads Authority and the Environment Agency. <u>The Joint Position Statement indicates that modelling on the Broadland Flood Alleviation Project Area (much of the area without modelling) will be completed by the end of 2021.</u>
#45	Iain Withington	North Norfolk District Council	6.3: Include reference to CC flood extents.	Noted and will amend text.	Amend text to say: Developers should carefully assess the full range of issues associated with all sources of flood risk when producing development proposals, <u>including climate change flood extents.</u>

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#46	Iain Withington	North Norfolk District Council	<p>Horning development: I can see no reference to the joint position statement with Anglian water on the development restrictions in the Horning water recycling centre catchment , i.e. Knackers wood WRC</p> <p>Reference should be given to the SCG which states that : 'New development likely to give rise to additional foul drainage output will not be permitted where either (a) this intensifies the use of non-mains foul drainage arrangements, or (b) this intensifies the use of mains foul sewer ahead of essential sewerage infrastructure works and demonstration that there is sufficient capacity at the sewage treatment works to serve the proposed development without harming nearby designated sites.'</p> <p>The SCG goes on to say "This means that there will be a presumption against developments that increase flows to the WRC in the short term. Similarly, there will be a presumption against developments that rely upon stand alone foul water treatment solutions as they too have the potential to adversely affect water quality."</p> <p>As far as I am aware the situation has not moved on and this still stands .see below AW text</p>	<p>Noted. This SPD is about flood risk, not wastewater. The Position Statement is heavily referenced in the Local Plan. We will reference this in the table for North Norfolk under foul sewer.</p>	<p>Add this text: <a href="#">Of relevance to the North Norfolk area is the Joint Position Statement relating to Horning Knackers Wood Water Recycling Centre. To summarise, due to capacity issues, development that increases foul drainage output is not likely to be permitted.</a></p>
#47	Iain Withington	North Norfolk District Council	<p>Hoveton Anglian water have also commented on proposals in our emerging local plan with regard Hoveton, where it is understood they are developing a position statement . these comments stem from the acknowledgment of particular issues of discharge and flooding from the river into the drainage systems. "Policy DS13 states that a wider water catchment strategy and foul water drainage strategy are required for this allocation site. However the supporting text refers to the water catchment strategy being aligned with the overall catchment strategy. Any site specific strategy would need to be aligned with any wider catchment strategy. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. To be effective there is a need to clarify what is the requirement for the applicant in relation to foul drainage and how this relates to any further technical work or investigation(s) undertaken by Anglian Water rather than the developer." You may like to flag these issues for consideration in your NNDC tables for foul sewer and WRC</p>	<p>Noted and will amend text. Also will request that NNDC keep us informed of the progress on this issue.</p>	<p>Add this text: <a href="#">At the time of writing, there are early discussions between the Environment Agency, North Norfolk District Council and the Broads Authority about particular issues of discharge and flooding from the river into the drainage systems.</a></p>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#48	Iain Withington	North Norfolk District Council	Comment to NNDC Local Plan consultation from Anglian Water Services - for information. Horning WRC: There have been a number of recorded incidents of flooding within the Horning sewerage catchment from surface water, groundwater and fluvial sources which are the responsibility of multiple agencies. This reduces the available capacity of foul sewerage network for additional foul flows from additional development within the catchment as outlined in the Joint Position Statement for Horning. Anglian Water has undertaken CCTV surveys of the existing public sewerage network at Horning to investigate the cause(s) of these flooding incidents. Following the completion of surveys we have undertaken repairs in February/March 2018 to mitigate surface water ingress where it interacts with the foul sewerage network in Anglian Water's ownership. We have also been actively working with relevant (flood) risk management authorities to address historic flooding in the Horning sewerage catchment where it relates to Anglian Water's assets. As part of which we have been liaising with North Norfolk District Council to enable the removal of existing surface water connections to the foul sewerage network from existing residential and commercial properties so that existing surface water flows can be discharged to suitable alternatives e.g. watercourses. The Environment Agency has also committed to undertaking threshold surveys within the sewerage catchment to establish flood risk from the Broads for every household within the catchment. The Joint Position Statement for Horning is to be updated to reflect the current position relating to the investigation and works undertaken to date by Anglian Water and by other risk management authorities within the catchment.	Noted.	No change to SPD
#49	Iain Withington	North Norfolk District Council	Comment to NNDC Local Plan consultation from Anglian Water Services - for information. Hoverton: Anglian Water is currently preparing a position statement relating to Hoverton catchment which follows recent discussions with Cllr Dixon. It is intended to set out the current position relating to this catchment including historic issues within the network and the implications for new development.	Noted.	No change to SPD