Strategic Flood Risk Assessment Position Statement
Produced by the Broads Authority and the Environment Agency
Updated September 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 previous Broads SFRA modelled overtopping of the flood defences so it showed 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 previous Broads SFRA also included the effects of a breach in terms of likely hazard at a predetermined coastal location, showed areas of Functional Floodplain (flood zone 3b), and indicated 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. The original Position Paper (2018) 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. SFRAs 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

To reflect that the SRAs have been completed, but the Environment Agency maps for flooding are updated periodically, the SFRAs and EA Flood Maps for Planning will both be used when considering planning applications.

3. The 'BESL' model

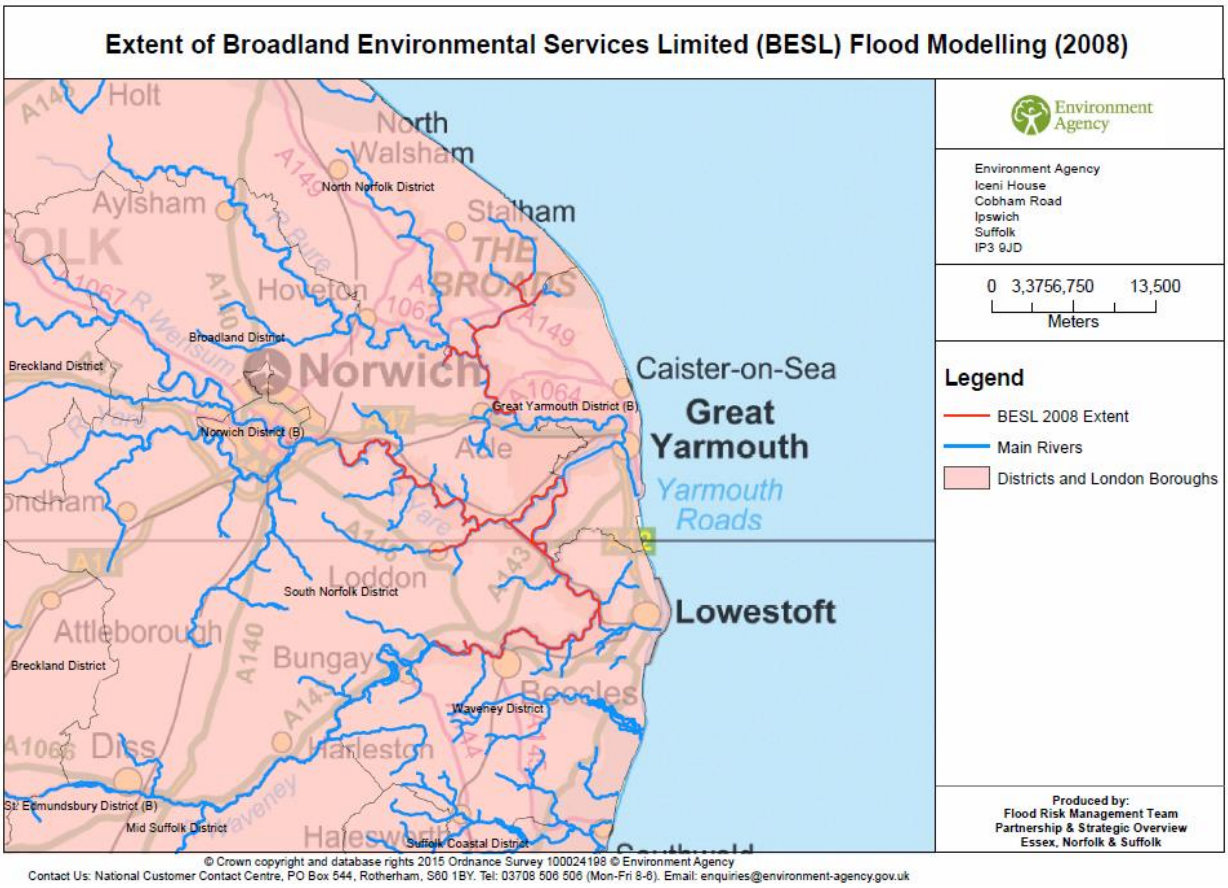
3.1. When compiling the Project Brief for updating the Norfolk SFRAs and assessing the status of the flood risk models which the consultant would need to use to produce the SFRAs, it became obvious that there was an issue with a model that covered a large area of Norfolk, centred mainly on the Broads.

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[1].

3.3. 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 SFRAs and the SFRA for the former Waveney area, now East Suffolk).

[1] http://bfap.org.uk/



4. <u>The agreed way forward</u>

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

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. <u>Broadland Futures Initiative</u>

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.

6. <u>Summary and Conclusions</u>

6.1. SFRAs are very important for the production of Local Plans. There are updated SFRAs for most of Norfolk together and for the Waveney area (now East Suffolk). However a large area of the Broads was not assessed in detail as part of this work because the BESL model needed to be updated by the Environment Agency and the model run to produce SFRA equivalent information.

6.2. The timing of the work means that the SFRAs that cover the Broads do not have modelled data to inform the BESL area. As such, the Local Plan for the Broads was examined and 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).

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 was agreed with the Environment Agency – that a precautionary approach will be used in Norfolk and in Suffolk[2] 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 was produced in liaison with the Environment Agency, using the Environment Agency flood risk information.

[2] 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.