



Strategic Flood Risk Assessment Position Statement
Produced by the Broads Authority and the Environment Agency
May 2017

Introduction

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'*.

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'*.

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'.*

The SFRA provides more detail than the Environment Agency Flood Map for Planning. For example, the current Broads SFRA modelled overtopping of the flood defences so it shows 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 Broads SFRA also includes the effects of a breach in terms of likely hazard at a predetermined coastal location, shows areas of Functional Floodplain (flood zone 3b), and indicates how climate change is likely to lead to an increase flood risk.

SFRAs are very important when preparing a Local Plan as well as when determining Planning Applications.

This Position Paper seeks to explain the SFRA situation as it relates to the Broads Authority Executive Area and the production of the Broads Local Plan.

Strategic Flood Risk Assessment 2017 update

The current SFRA that covers the Broads Authority Executive Area was produced in 2007/8 as part of a joint study also involving Broadland, Norwich, North Norfolk and South Norfolk. Due to its age, it does not include the most recent flood modelling data or climate change allowances. Furthermore, the 'BESL area' (as discussed later) was not assessed as part of this 2008 work (as defence work was being undertaken). As such, the Local Planning Authorities in Norfolk (except Breckland Council who had already completed their SFRA) decided to work together to produce an updated SFRA for most of Norfolk. The SFRA should be completed for this entire area by October 2017.

With regards to Waveney District Council, they were also producing a SFRA for their entire district (including that which is the Broads) at the time of writing with reporting on a similar time scale to the Norfolk SFRA.

The 'BESL' model

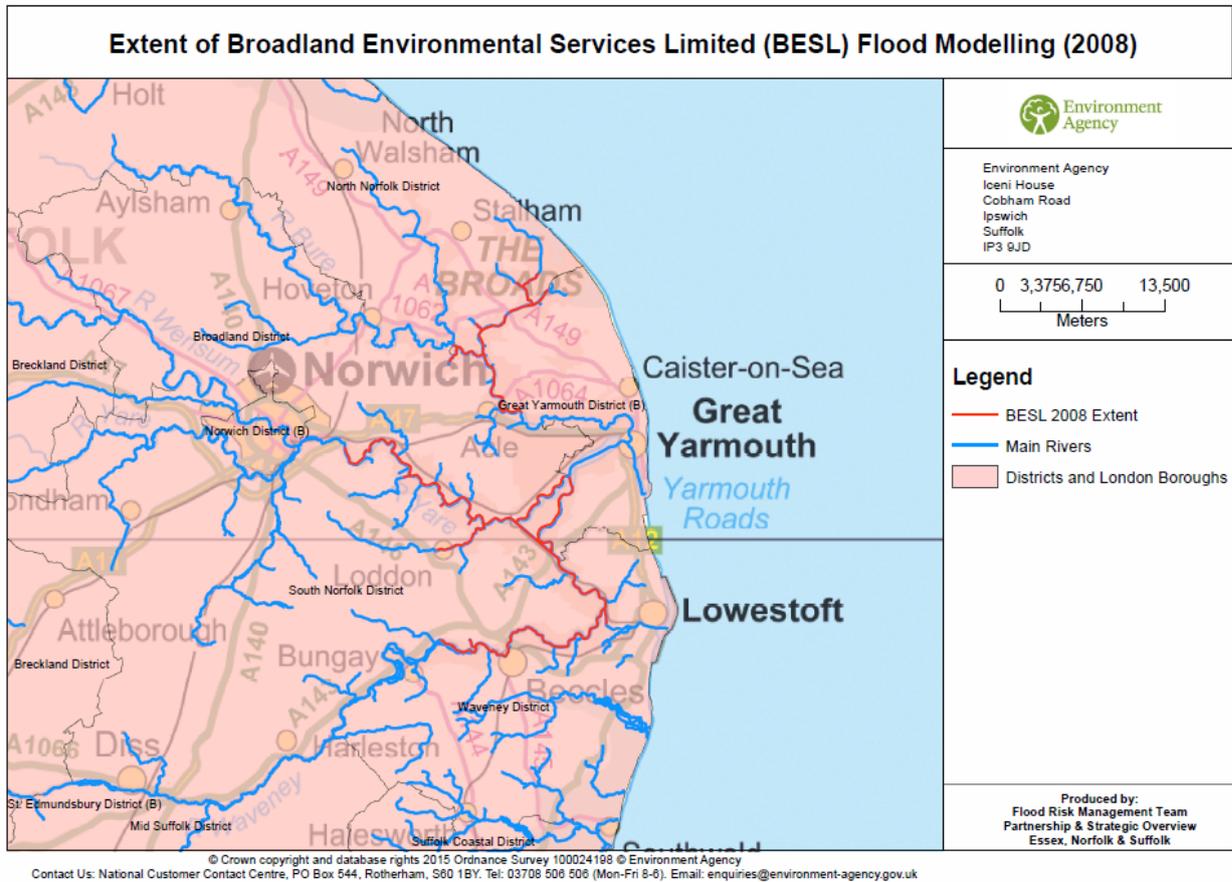
When compiling the Project Brief for the Norfolk SFRA and assessing the status of the flood risk models which the consultant would need to use to produce the SFRA, it became obvious that there was an issue with a model that covered a large area of Norfolk, centred mainly on the Broads.

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 Broads¹.

At the time of writing, the model is not owned by the Environment Agency, so is not freely available to use. It also requires further work to enable it to inform an SFRA.

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 central part of the Broads is covered by this model and therefore will not be assessed as part of the current SFRA updates (both the Norfolk SFRA and the Waveney SFRA).

¹ <http://bfap.org.uk/>



The agreed way forward

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

The Environment Agency intends to obtain the BESL model and have it updated by around June 2019. They will run the model to effectively produce an equivalent to the SFRA level 1 information that is being produced as part of the current ongoing SFRA updates for Norfolk and Waveney.

The current SFRA updates for Norfolk and Waveney will provide SFRA level 1 information for the parts of the Broads not covered by the BESL model.

By September 2017, some of the Broads Authority Executive Area will be assessed with flood risk data for zones 1, 2, 3a, 3b plus climate change being produced. The rest of the area (that covered by the BESL model) will be assessed with the same flood zone information by around June 2019.

Summary and Conclusions

SFRAs are very important for the production of Local Plans. Work is currently underway to provide up to date SFRAs for most of Norfolk together as well as Waveney. However a large area of the Broads will not be assessed as part of this work because the model needs to be obtained and updated by the Environment Agency and the model run to produce SFRA equivalent information by around June 2019.

The timing of the work means that the Broads Local Plan will go to the Publication stage of its production (at around September/October time) without a complete revised SFRA having been produced for the entire area (because the BESL model will be ready to use in an SFRA around June 2019 which could even be after Examination of the Local Plan).

The lack of an updated SFRA for much of the Broads will not hold back or affect the Local Plan for the Broads for the following reasons:

- A suitable and pragmatic way forward has been agreed with the Environment Agency.
- 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.
- 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.
- 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.
- A Sequential Test for the sites allocated for development has been produced in liaison with the Environment Agency, using the Environment Agency flood risk information.