Flood Defences and Flood Risk of Housing Developments 18th September 2017

- 1.1 The publication of the Huntingdonshire Strategic Flood Risk Assessment 2017 (SFRA 2017) and the new draft Local Plan has been a trigger for the Council to reconsider its approach to assessing flood risk in meeting its objectively assessed need for housing.
- 1.2 The National Planning Policy Framework (NPPF) makes clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The Planning Policy Guidance (PPG) makes clear that, for the purpose of the NPPF, flood risk is a combination of the probability and the potential consequences of flooding.
- 1.3 Flood defences can reduce the probability of flooding, but they can also increase the consequences of flooding. This is because, if a breach of defences does occur, it can result in the rapid onset of flooding with little or no warning. The new SFRA 2017 follows the PPG and does not take into account flood defences. Areas that benefit from flood defences are still in an area of higher flood risk as there is a residual risk that the flood defence could fail. This is particularly relevant given that development needs to be safe for its lifetime which the PPG states should be considered to be a minimum of 100 years for homes.
- 1.4 Government policy requires Local Planning Authorities to steer new development to areas with the lowest probability of flooding, and makes clear that the Strategic Flood Risk Assessment will be the starting point for applying this Sequential Test – that is to investigate risks further (through flood risk assessment) and to avoid locating development in areas at flood risk from any source, wherever possible. The SFRA 2017 shows areas at risk of flooding at the date of publication, and into the future for fluvial risk with climate change scenarios. The SFRA also signposts further sources of flood risk information, such as Environment Agency Flood Maps for Surface Water that also indicate areas that may be at risk from surface water flooding.

Definition
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)
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)
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) See 2017 SFRA maps
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) See 2017 SFRA maps.

- 1.5 For the Sequential Test, the regularly updated Environment Agency Flood Maps provide the definitive maps of flood zones 1, 2 and 3. The SFRA 2017 shows the split between flood zones 3a and 3b. Together the EA flood maps and SFRA 2017 form the basis for applying the NPPF Sequential Test.
- 1.6 Detailed guidance on flood risk is set out in sections 4 and 5 of the Cambridgeshire Flood and Water Supplementary Planning Document (2017).

- 1.7 A development's objective is key in determining the geographical area over which the Sequential Test is to be applied. For example, for developments proposing market or affordable housing to meet the needs of the District, the area over which to consider whether there are other sites at lower risk of flooding is the whole District. In contrast for example, where a housing development is meeting the particular identified needs of a settlement (an 'exception site'), the area over which to consider whether there are other sites at lower risk of flooding would be that settlement.
- 1.8 The work on the new Local Plan shows that the District identified housing need can generally be met by developments in Flood Zone 1, with some exceptions in flood zone 2.
- 1.9 Developments in Flood Zones 2 and 3 will not therefore be permitted unless, to guote the NPPF, "it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding". This applies to defended as well as undefended areas within Flood Zones 2 and 3. A regeneration project might be an example of a development that met "wider sustainability objectives".
- 1.10 If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for a development to be located in zones with a lower probability of flooding, any proposed housing development in Flood Zone 3a must still pass the Exceptions Test to be permitted.

For the Exceptions Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; AND
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 1.11 Some villages, including some of the Ramsey villages, are entirely within Zone 3 in the 2017 SFRA, and an application of the above approach would mean that no general market housing only developments would be approved in these villages. New development within settlements, including market housing, can help enhance or maintain the vitality of a rural community and this is a key objective of the Council's Planning Strategies and the NPPF. Therefore, for those villages which are entirely within Flood Zone 3 as defined in the 2017 SFRA only, the 2010 SFRA which took account of flood defences will be used as the basis for decisionmaking, and general market housing will only be permitted in areas shown as being in Flood Zone 1 as defined in that document. This approach follows discussions with the Environment Agency and the Middle Level Commissioners and will ensure that regard is still given to flood risk but will also allow some development to be approved in these villages to maintain their vitality. For villages that are not entirely within Zone 3 in the 2017 SFRA, the application of the Flood Zones in 2017 will allow some development to be approved in these villages to maintain their vitality whilst also having regard to the most recent information on flood risk.

Strategic Flood Risk Assessment 2010 – Flood Zones for Middle Level Commissioner Areas









































