

2010 Strategic Flood Risk Assessment Supplementary Statement for Faversham Creek

The Strategic Flood Risk Assessment identifies much of the land adjoining Faversham Creek within Flood Zone 3B (the functional flood plain where water has to flow or be stored in times of flood). Generally only water compatible and essential infrastructure is considered suitable in such areas.

The steps included in Section 6 of the Swale Borough Council Strategic Flood Risk Assessment (SFRA) for Local Development Framework – Level 1 and 2 Assessments (October 2009) expand on the guidance in Planning Policy Statement 25 and its Practice Guide, but focus on the case of allocating new sites for development. The Assessment is less explicit about how to assess the development of previously developed land within areas of 1:20 year flood risk.

This Strategic Flood Risk Assessment Supplementary Document (2010) provides guidance on the change of use or redevelopment of previously developed land within the 1:20 year flood risk area of Faversham Creek and has been produced in consultation with the Environment Agency.

This Supplementary Document applies only to Faversham Creek due to the relatively confined nature of the floodplain - which should enable safe access in most instances - together with the Local Planning Authority's long standing aim for regeneration in the area.

Given the previously developed nature of these areas, and the prevailing convention to remove built-up areas from functional floodplain, a special designation is given to those previously developed areas which are located within the 1:20 year flood risk zone – Flood Zone 3a(i).

This means that there is an acknowledgement of the high flood risk in these areas, without applying the strict policy restrictions associated with functional floodplain (Flood Zone 3b).

The following approach will be applied and supersedes the advice in the SFRA in relation to previously developed land within the 1:20 year flood zone of Faversham Creek.

Within previously developed areas of the 1:20 year flood zone of Faversham Creek, Flood Zone 3a(i), all development proposals should be accompanied by a detailed Flood Risk Assessment (FRA) which demonstrates:

1/ Where change of use of an existing building is proposed

- that proposals for the ground floor are no more vulnerable than the current use and exclude residential development, and
- that upper floors are designed to be safe and that there is safe access and egress in accordance with paragraph 4.52 onwards of Planning Policy Statement 25 Practice Guide.

2/ Where redevelopment is proposed that

- more vulnerable uses such as residential development are not located on the ground floor
- there is no detriment to flood flow and wherever possible opportunities are taken to build in increased flood storage, flood flow routes and sustainable drainage
- flood risk elsewhere would not increase
- the development has been made safe through design and flood resistant and resilient construction, and
- while it is generally not possible to change and improve access arrangements beyond the boundary of the property, wherever possible, risks associated with access should be reduced as part of the redevelopment.

In the light of this re-designation, particular attention should be given to the issue of safe access and egress. The PPS25 Practice Guide advises that developers should consult the Local Planning Authority (LPA) and the Environment Agency at the earliest stage. Swale Borough Council will also need to consult their emergency planners if new development is likely to have implications for emergency planning and the emergency services.

PPS25 states:

'Developers should ensure that appropriate evacuation and flood response procedures are in place to manage the residual risk associated with an extreme flood event to the satisfaction of the LPA. In locations where there is a residual risk of flooding due to the presence of defences judgements on whether a proposal can be regarded as safe will need to consider the feasibility of evacuation from the area should it be flooded.'

Paragraph 4.64 goes on to state that: *"Effective emergency planning for floods (through the work of the local resilience forums) is a key component of the Government's emerging National Flood Emergency Framework. If adequate and up-to-date evacuation plans exist for areas potentially at risk, it will be more practical for emergency planners and the emergency services to provide an opinion on the merits of specific development proposals."*

Spatial and emergency planners should ensure the additional burden associated with any new development will not compromise their existing ability to manage a flood incident.

It should also be noted that the Environment Agency is likely to object to any application where the FRA concludes that the depth and velocity of flooding are such that an acceptable standard of safety cannot be achieved or, where the FRA fails to demonstrate that these standards have been met and approved by the LPA.

All proposals for development in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment for the site.

There is no doubt from the SFRA that flood risk is a constraint to development along the Creek side. In practice, however, development is ongoing as part of a regeneration strategy for the area included in the adopted Local Plan and subsequent emerging vision.

Conclusion:

Best practice and Government guidance indicates that the more vulnerable uses such as residential development should be located on areas of lower risk of flooding.

Within previously developed areas of the 1:20 year flood zone of Faversham Creek, Flood Zone 3a(i), all development proposals should be accompanied by a detailed Flood Risk Assessment (FRA) which demonstrates where change of use of an existing building is proposed that proposals for the ground floor are no more vulnerable than the current use and exclude residential development, and that upper floors are designed to be safe and that there is safe access and egress in accordance with paragraph 4.52 onwards of Planning Policy Statement 25 Practice Guide:

Where redevelopment is proposed, the FRA should demonstrate that

- more vulnerable uses such as residential development are not located on the ground floor;
- there is no detriment to flood flow and wherever possible opportunities are taken to build in increased flood storage, flood flow routes and sustainable drainage
- flood risk elsewhere would not increase
- the development has been made safe through design and flood resistant and resilient construction, and
- while it is generally not possible to change and improve access arrangements beyond the boundary of the property, wherever possible, risks associated with access should be reduced as part of the redevelopment.

In Flood Zone 3a(i) it is important that future FRAs are able to confirm that the Borough Council has an appropriate flood plan for the area.