

Local Plan Panel Meeting		Agenda Item:
Meeting Date	27 th November 2019	
Report Title	<i>Swale Borough Council Level 1 Strategic Flood Risk Assessment (SFRA)</i>	
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning	
SMT Lead	Emma Wiggins	
Head of Service	James Freeman	
Lead Officer	Anna Stonor	
Key Decision	No	
Classification	Open	
Recommendations	<p>Recommend to Cabinet that they:</p> <ol style="list-style-type: none"> 1. Note the findings of the SFRA and agree that it should be used as part of the evidence base for the Swale Local Plan Review. 2. Agree that mapping from the SFRA should be incorporated into the interactive mapping on the Swale Borough Council website. 	

1. Purpose of Report and Executive Summary

- 1.1. This report updates the Local Plan Panel on work carried out by engineering and environmental consultants, JBA, on the *Swale Borough Council Level 1 Strategic Flood Risk Assessment (SFRA)*. The assessment is attached to this report as Appendix I.
- 1.2. The SFRA assesses flood risk within the borough from all sources, now and into the future as well as assessing the impact that cumulative land use changes and development will have on flood risk.
- 1.3. The SFRA has been prepared in close co-operation with the Environment Agency and Kent County Council (KCC) as the Lead Local Flood Authority. Swale's Engineering Team and Emergency Planning Team have also been closely involved. The Lower Medway Internal Drainage Board, the Marine Management Organisation and Southern Water (as sewerage undertaker) have also been consulted.
- 1.4. The SFRA will be used by the Planning Policy Team as part of the evidence base for the Local Plan Review, by the Development Management Team in their consideration of applications, by Developers in the preparation of applications and by members of the public interested in this issue.

- 1.5. The Panel is asked to review and note the findings of the SFRA and recommend to Cabinet that the *Swale Borough Council Level 1 Strategic Flood Risk Assessment* becomes part of the evidence base for the Local Plan Review.

2. Background

- 2.1. Strategic Flood Risk Assessments are studies carried out for local planning authorities to assess the risk to an area from flooding now and in the future and to assess the impact that land use changes and development in the area will have on flood risk. SFRAs are required by the NPPF.
- 2.2. As a largely low-lying coastal borough on the edge of the Kent Downs Swale is vulnerable to flooding from a variety of sources. Significant areas of the borough have been impacted by tidal flooding in the past, including at Sittingbourne, Faversham, Sheerness and Queenborough. Fluvial flood events have been recorded at Iwade, Minster, around Boughton and at Lower Halstow. Groundwater flooding has been recorded at Sittingbourne, Boughton and Faversham and surface water flooding has occurred across the borough including in elevated areas. Flooding from sewers can also be an issue in Swale. The Swale Level 1 SFRA considers each of these sources, as well as the potential for reservoir flooding, all within the context of climate change.
- 2.3. JBA are a well-established national engineering company who have prepared SFRAs for over 150 local authorities in England and Wales. Locally, they have worked on SFRAs in Ashford, Maidstone, Sevenoaks, and Tunbridge Wells as well as doing modelling for the North Kent Coast and Iwade Stream projects. They are well known to the Environment Agency and Kent County Council (the Lead Local Flood Authority).

3. The planning policy context and how the SFRA will be used

- 3.1. The National Planning Policy Framework (NPPF) states that 'the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change' (para 148) and that 'plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk (para 149).
- 3.2. The NPPF also sets out that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future) (para 155). It goes on to say (para 156) that 'strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.'

- 3.3. The NPPF also directs local plans to apply a sequential, risk-based approach to the location of development, to avoid flood risk to people and property. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Furthermore, development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The SFRA gives the council the evidence needed to follow this approach.
- 3.4. As well as assisting the Planning Policy team in the allocation of the most appropriate sites for development (in particular through the development of the Strategic Housing Land Availability Assessment, the Sustainability Appraisal, the Sequential Test, and where necessary the Exception Test¹) the SFRA will inform the development of policy within the local plan. It can also be used by the development management team to inform their assessment of planning applications. Furthermore, the SFRA contains advice on how to carry out site specific Flood Risk Assessments (FRAs) and as such will be used by the Applicants and Developers when they carry out FRAs. It is also the intention to make the SFRA and the maps available on the Council's interactive website and for use, for example, by Developers and the public.
- 3.5. Furthermore, the SFRA identifies opportunities to reduce flood risk to existing communities across the borough.

4. Assessment Methodology

- 4.1. National Planning Policy guidance sets out how SFRA's should be prepared and explains that there are two stages of SFRA. The first stage (this one) is a Level 1 SFRA. This covers the whole borough but is detailed enough to allow the application of the Sequential Test. A Level 2 SFRA is a more in depth study which may be needed at a later stage if the Sequential Test shows that land outside flood risk areas cannot appropriately accommodate all the development necessary for the borough.

5. Key Outputs and Findings

- 5.1. The SFRA comprises the Level 1 report itself (Appendix I of this report), a high level screening spreadsheet of development sites and a range of maps produced as both PDFs (Appendix 2 of this report) and in GIS form.
- 5.2. The key outputs are:
 - A review of all data sources

¹ The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Full explanations of the sequential and exceptions test can be found in Planning Practice Guidance at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach>

- Assessment and mapping of all sources of flooding across the borough, including the impact of climate change
- Guidance on the application of the Sequential Test
- A high level screening spreadsheet of development sites
- Guidance on how to carry out Flood Risk Assessments
- Mapping of flood alert and warning systems and flood defence infrastructure
- Opportunities to reduce flood risk across the borough
- An assessment of surface water management and the use of sustainable urban drainage systems.
- Recommendations for policy, development management and for developers.

5.3. The maps comprise:

- Historic flooding
- Watercourses
- Flood Zones
- Climate Change
- Surface Water
- Groundwater
- Reservoir inundation
- Flood defences
- Breach locations and extents
- Flood warnings and alerts
- Potential areas for flood defence improvements

5.4. We aim to also put the Level 1 SFRA maps onto the Swale Interactive mapping system. This will enable easy access for members of staff, the public and the development industry.

5.5. The key finding of the Level 1 SFRA is that Swale contains significant areas at high risk of flooding with tidal flooding resulting in the most severe consequences and surface water flooding being the most frequent. For development to proceed it must pass the Sequential Test and, where necessary, the Exceptions Test in accordance with the NPPF. The Council should use the information in the Level 1 SFRA when deciding which development sites to take forward in the emerging Local Plan. As such the SFRA will be used by the

Planning Policy team to inform the Strategic Land Availability Assessment, the Sustainability Appraisal and the development of the Sequential Test.

6. Proposal

6.1. The Swale Borough Council Level 1 Strategic Flood Risk Assessment (SFRA) has been carried out to inform the emerging Local Plan Review. The Panel is asked to:

1. Note the findings of the Level 1 SFRA and agree that it should be used as part of the evidence base for the Swale Local Plan Review.
2. Agree that mapping from the SFRA should be incorporated into the interactive mapping on the Swale Borough Council website.

7. Alternative Options

7.1. An alternative option for Panel Members is not to accept the results of the *Level 1 Strategic Flood Risk Assessment*. However, the assessment is a professional and up to date piece of evidence, carried out to reflect the requirements of national planning policy, in consultation with the Environment Agency and the Lead Local Flood Authority, which will be used in the assessment of sites and to inform policy development for the Local Plan Review. As such this approach is not recommended as it would not be using the best available evidence.

8. Consultation Undertaken or Proposed

8.1. As stated above the SFRA has been prepared in close co-operation with the Environment Agency and KCC as the Lead Local Flood Authority. Swale's Engineering Team and Emergency Planning Team have also been closely involved. The Lower Medway Internal Drainage Board, the Marine Management Organisation and Southern Water (as sewerage undertaker) have also been consulted.

7.1 Public consultation has not been undertaken for this assessment and as a highly technical assessment it would not be common practice to do so.

9. Implications

Issue	Implications
Corporate Plan	Supports the Council's corporate priorities for a borough and a community to be proud of.
Financial, Resource and Property	Within Local Plan budget.

Legal and Statutory	None anticipated at this time.
Crime and Disorder	None anticipated at this time.
Environment and Sustainability	The Local Plan process will be subject to Sustainability Appraisal.
Health and Wellbeing	None at this time.
Risk Management and Health and Safety	None at this time.
Equality and Diversity	The Local Plan process will be subject to Community Impact Assessments at appropriate points.
Privacy and Data Protection	Any data has been processed in a manner compliant with GDPR.

10. Appendices

- 10.1. Appendix I - *Swale Borough Council Level 1 Strategic Flood Risk Assessment (SFRA)*, November 2019

11. Background Papers

- 11.1. None