

Contact: suds@lancashire.gov.uk

Date: 21 October 2022

Dear Edward,

Thank you for your emails with questions (in bold) regarding the Strategic Flood Risk Assessment for the Central Lancashire Local Plan review, dated 13th and 14th October 2022, respectively. This is set out below along with our comments.

The Lead Local Flood Authority's role in planning is limited to surface water drainage. The Environment Agency has a strategic overview role of all sources of flood risk and it is recommended you seek their advice on all flood risks. As you'll be aware the Planning Practice Guidance states that all plans need to be informed by flood risk advice where relevant, from the Lead Local Flood Authority. Notwithstanding this, it is ultimately up to each Local Planning Authority what approach is taken to plan making, including in relation to evidence base documents such as the Strategic Flood Risk Assessment.

1. Is using the long-term flood risk map (<https://check-long-term-flood-risk.service.gov.uk/map>) appropriate for assessing surface water flood risk 'in the future' as referenced in PPG paragraph 1?

Used on its own the long-term flood risk map is not appropriate for assessing surface water flood risk in the future as it only presents the 'current day scenario' and doesn't allow for 'future scenarios' that could have impacts on surface water flood risk, such as climate change and urban creep.

The long-term flood risk map is one form of data used to inform the assessment of surface water flood risk. It should be used alongside and in addition to other sources of data on surface water that are held by the Environment Agency, Lead Local Flood Authority (LLFA), United Utilities, District Councils, and the Highway Authorities (National Highways and Lancashire County Council) and the appropriate assessment for climate change in accordance with the latest allowances.

2. Do the LLFA expect us to Level 2 assess any land we propose to allocate with greater than 0.1% surface water flood risk (i.e. either currently or in the future)?

Paragraph 005 of the Flood Risk and Coastal Change section of the Planning Practice Guidance (PPG) states that local planning authorities are required to consider whether a proposed development will be safe for its lifetime, giving appropriate consideration to:

"the safety of people within a building if it floods and also the safety of people around a building and in adjacent areas, including people who are less mobile or who have a physical impairment. This includes the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood (0.1% annual probability of flooding with allowance for climate change)".

It is our understanding that Paragraph 005 relates to all sources of flood risk, including surface water and that Local Planning Authorities are expected to Level 2 assess sites proposed for allocation with greater than 0.1% (1000 year) surface water flood risk rather than the 1% (100 year) design flood criteria specified in Paragraph 002 of the Flood Risk and Coastal Change section of the Planning Practice Guidance. This is for the Local Planning Authority to interpret and apply as appropriate using the guidance set out in the flowchart provided in Diagram 1 of Paragraph 007 of the Flood Risk and Coastal Change section of the PPG.

If the Local Planning Authority decides not to Level 2 assess sites with between a 0.1% (1000 year) and 1% (100 year) surface water flood risk, then we advise that you should make it clear in the SFRA and explain your reasons why to justify the approach taken. This is to provide clarity to the Planning Inspector, the community and to developers so there is no ambiguity on what basis allocated sites have been assessed in the SFRA.

The LLFA also recommends you set out clear expectations, either through the SFRA or through local policy, or both, on how the safety of people should otherwise be considered and assessed. If it is to be assessed by developers through site-specific flood risk assessments, which appears to be the only alternative, then what about sites that do not trigger a site-specific flood risk assessment under Footnote 55 of Paragraphs 167 and 168 of the National Planning Policy Framework (2021)?

There is also potential for sites to change from low surface water flood risk to medium/high surface water flood risk after the onset of climate change could be missed. We recommend you apply the latest [climate change allowances](#) and link this to the expected effects of climate change on risk identified in the SFRA.

3. It is our view that the existing Level 1 SFRA for Central Lancashire, covering the administrative areas of Chorley Borough Council, Preston City Council and South Ribble Borough Council, needs to be updated in its entirety given updates to the following guidance and available flood risk data and information.

Therefore, further to our meeting yesterday, please can the Environment Agency and the County Council (as the LLFA) confirm in writing that they agree that an update to our existing Level 1 SFRA is required due to the following changes to Government guidance, namely:

- **National Planning Policy Framework (NPPF) – updated July 2021;**
- **Flood Risk and Coastal Change Planning Practice Guidance (PPG) – updated August 2022;**



- Climate change allowances – updated July 2021 for peak river flows and May 2022 for peak rainfall intensities;
- ‘How to Prepare a Strategic Flood Risk Assessment’ guidance – updated March 2022.

We propose to carry out the following updates to the Level 1 report and Appendix A to account for:

- The updated guidance stated above;
- Any new flood risk information readily available from the EA’s open source online data;
- Updated sites screening assessment based on any new flood risk information and changes to the sequential test regarding how surface water risk is considered.

Also, undertake updates to the following to account for sequential test changes and any new flood risk information, i.e. the:

Sites Screening Spreadsheet (Appendix C) – most recently updated March 2022;

- Strategic Recommendations for Proposed Sites (Appendix E);
- Strategic Recommendations maps (Appendix F);
- Updates to the GeoPDF Maps (Appendix B) to include most recently assessed sites (March 2022);
- Updates to the Level 1 SFRA User Guide (Appendix G).

In summary the updated Level 1 SFRA will comprise an:

1. Updated Level 1 SFRA main report
2. Updated appendices including:
 - a. Planning framework and flood risk policy (Appendix A)
 - b. SFRA GeoPDF Maps (Appendix B)
 - c. Sites Assessment Excel spreadsheets (Appendix C)
 - d. Strategic recommendations report (Appendix E)
 - e. Strategic recommendation maps (Appendix F)
 - f. Level 1 SFRA User Guide (Appendix G)
3. GIS data used in the Level 1 SFRA update in Arc or MapInfo format as required.

We do not propose to carry out:

- Updates to the functional floodplain (Flood Zone 3b);
- Modelling of most recent climate change allowances;
- Data requests for historic incidents.

Please can you confirm in writing that you agree with the nature of, and need for, this update.

We agree that an update to the existing Level 1 SFRA is required, but we are not confident that the approach proposed takes full account of future climate change. We recommend



you apply the latest climate change allowances and link this to the expected effects of climate change on risk identified in the SFRA.

Failure to do this could see the impacts of surface water flooding in the future being under assessed. There is also potential for sites to change from low surface water flood risk to medium/high surface water flood risk after the onset of climate change which could be missed.

Any resulting changes may mean that sites could subsequently need to be assessed as part of a Level 2 SFRA.

I trust this response is helpful.

Yours faithfully,

Elliot Burton

Lead Local Flood Authority

