

Report to: Strategic Planning Committee



Date of Meeting: 30 April 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Strategic Flood Risk Assessment Level 1 and scoping for Level 2 SFRA

Report summary:

The National Planning Policy Framework ([NPPF](#)) requires the local plan to have regard to the long-term implications of flood risk and to help manage flood risk from all sources, taking account of the future impacts of climate change. It states that strategic policies should be informed by a strategic flood risk assessment and that we should apply a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property. Local plans should also: safeguard from development any land likely to be required for flood management; secure green and other infrastructure that will reduce flooding and consider relocating existing development to more sustainable locations where climate change is expected to increase flooding.

A Level 1 Strategic Flood Risk Assessment (SFRA) has been completed in accordance with the relevant national [guidance](#) and in collaboration with Environment Agency and Devon County Council. It was prepared by specialist environmental and engineering consultants [JBA](#). Targeted consultation was undertaken on the draft SFRA with relevant bodies such as South West Water, reservoir owners, emergency planners, coastal groups and neighbouring authorities. Climate change modelling was undertaken in accordance with the national planning guidance and in agreement with the Environment Agency.

The SFRA Level 1 has been undertaken to provide evidence for the local plan, but will also be useful for neighbourhood planning, developers and to inform development management decisions.

This report highlights those elements of the SFRA Level 1 that are considered to be most relevant to plan making, but Members should be aware that this is highly technical work, and they should refer to the report produced by JBA for a fuller understanding of the scope of the work and its complexities. The Executive Summary of the report is reproduced in Appendix 1 of this report.

The SFRA Level 1 reports that the main sources of flooding in East Devon are from watercourses, the sea, surface water and sewers. Historically, most recorded flood incidents within East Devon have been due to fluvial flooding and surface water flooding but there has also been significant tidal flooding in communities along the coast.

The cumulative impact of flooding was considered, and areas identified where there is a greater chance of encountering cumulative effects from planned development. The report sets out mitigation measures that could be undertaken to ensure flood risk is not exacerbated, and states that in many cases new development should be used to improve the flood risk.

Detailed guidance is given on how applicants should prepare strategic flood risk assessments for development proposals and sustainable drainage systems.

The report makes a series of recommendations to guide the allocation of sites and development of policies to manage flood risk in the local plan.

Government [guidance](#) suggests that a Level 2 SFRA should be prepared if land is considered for allocation in areas at risk of flooding to give more detail on the nature of the flood risks involved. Following the Level 1 SFRA a scoping exercise was undertaken by JBA to identify sites that would need to be subject to a Level 2 SFRA. This work commenced in April 2024 and is expected to take 4 to 5 months (some detailed survey work is required).

The SFRA Level 1 provides the highly technical and robust evidence necessary to inform the policies and allocations of the local plan. It is recommended that SPC endorse the work and use it to inform the emerging local plan.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Committee note the Level 1 SFRA and endorse it as evidence to underpin flooding issues for the emerging local plan.
2. That Committee agree that the SFRA should be used in the formulation of policies to be included in the local plan relating to flood risk.
3. That Committee note the need to consider the results of ongoing work on a Level 2 SFRA before local plan allocations are finalised.

Reason for recommendation:

To highlight the evidence provided by the SFRA Level 1 and seek agreement for its use as evidence for flood risk issues in the emerging local plan.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management, e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk; The SFRA Level 1 has been produced in collaboration with the Environment Agency and Devon County Council and meets the requirements set in national policy/guidance.

Links to background information

Links to background documents are contained in the body of this report.

Link to [Council Plan](#)

Priorities (check which apply)

- Better homes and communities for all
 - A greener East Devon
-

1. Background

- 1.1 The consultants JBA have produced a Level 1 Strategic Flood Risk Assessment (SFRA) to provide evidence to support the local plan and in accordance with national planning policy and guidance.
- 1.2 Paragraph 158 of the National Planning Policy Framework (NPPF) states that “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk”. Paragraph 166 states that “Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources”. Paragraph 167 states that “All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property”. Plans should also: safeguard from development any land likely to be required for flood management; secure green and other infrastructure that will reduce flooding and consider relocating existing development to more sustainable locations where climate change is expected to increase flooding.
- 1.3 There is extensive national planning policy guidance on flood risk, and this is supported by further technical guidance on issues, including how to prepare a strategic flood risk assessment (SFRA). The guidance explicitly requires flood risk to be taken into account in the preparation of strategic policies by undertaking a ‘Level 1’ SFRA. JBA completed this work on behalf of EDDC in February 2024. The full Level 1 SFRA report and appendices are available to view at [Evidence Base and Supporting Documents - Climate Emergency and Response - East Devon](#).

- 1.4 The Level 1 SFRA includes a 135 page report that is supported by 17 appendices. Members are encouraged to read the Executive Summary of the report (reproduced as Appendix 1 to this report) to gain a better understanding of the work. This sets out the purpose of the assessment, summarises flood risk and explains how the work can be used by different groups to understand flood risk and plan accordingly. Members may also be interested in reading the full report, or certain aspects of it. To identify the areas of greatest interest, Members may wish to consult Appendix 2 of this report (which reproduces the useful table from paragraph 1.7 of the SFRA report). This sets out the structure of the SFRA report and gives guidance on how each section should be used.
- 1.5 Some of the Appendices to the SFRA report comprise pdf. documents that show flood risk maps of East Devon by the source of flooding. The aspiration is to put these flooding maps into an interactive format. We will be working with STRATA to deliver this in due course. Interactive mapping is required by national guidance and strongly encouraged by the Environment Agency.
- 1.6 The Level 1 SFRA was commissioned to provide evidence for the local plan but can also be used for neighbourhood planning, by developers and to inform development management decisions.

2. Brief summary of Level 1 SFRA report

- 2.1 The Level 1 SFRA report provides a comprehensive and robust evidence base on flood risk issues to support the review and update of the East Devon Local Plan and associated planning policy documents using the best available information. It can be used to inform the Local Plan on the location of future development and the preparation of sustainable policies for the long-term management of flood risk.
- 2.2 The key objectives of the assessment were.
- To update the local plan, taking into account the most recent policy and legislation in the National Planning Policy Framework.
 - To collate and analyse the latest available information and data for current and future flood risk from all sources, and how these may be mitigated.
 - To inform decisions in the emerging Local Plans, including the selection of development sites and planning policies.
 - To provide evidence to support the application of the Sequential Test for the allocation of new development sites.
 - To provide a comprehensive set of maps presenting flood risk from all sources that can be used as evidence base for use in the emerging Local Plan.

- To provide advice for applicants carrying out site-specific flood risk assessments and outline specific measures or objectives that are required to manage flood risk.

2.3 Sources of flood risk identified in the SFRA are.

- Fluvial – this type of flooding results from water levels exceeding the bank level of a main river. The primary sources of fluvial flood risk in East Devon are along the River Exe, River Clyst, River Otter, River Sid, River Axe and their tributaries. These watercourses present fluvial flood risk to rural communities as well as to the main urban areas in East Devon. Fluvial Flood Zones are divided into:
 - Flood Zone 1: Low probability: less than a 0.1% chance of river and sea flooding in any given year.
 - Flood Zone 2: Medium probability: between a 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year.
 - Flood Zone 3a: High probability: greater or equal to a 1% chance of river flooding in any given year or greater than a 0.5% chance of sea flooding in any given year. Excludes Flood Zone 3b.
 - Flood Zone 3b: Functional Floodplain: land where water has to flow or be stored in times of flood.

Where possible, the SFRA determined the extent of fluvial flooding in East Devon by re-running existing modelling with the latest climate change allowances. Where detailed modelling was not available, flood zone 2 was used as an indicative climate change extent for flood zone 3a. This represents an acceptable approximation for highlighting areas that may be at higher risk of flooding due to climate change where detailed modelling is not currently available. Individual development proposals will require their own 'strategic flood risk assessments'.

- The area's most at risk of tidal flooding are Exmouth, Budleigh Salterton, Sidmouth and Seaton. In some places along the coastline, such as settlements along the Exe estuary, tidal flood risk can occur in combination with fluvial and surface water sources which can exacerbate flood risk.
- The Risk of Flooding from Surface Water map for [Devon](#) shows a number of prominent overland flow routes; these predominantly follow topographical flow paths of existing watercourses or dry valleys with some isolated ponding located in low lying areas. There are also considerable flow routes following the roads through the main urban areas of Buckerell, Kilmington, Cranbrook and Clyst St Mary, all of which are designated as a Flood Risk Area due to surface water flooding. Surface water flooding was considered using metrics to show the upper and lower bounds likely as a result of climate change.

- For sewer flood risk, South West Water historical hydraulic flood incident records have been used to identify areas which have experienced sewer flooding. Areas with recorded sewer flooding incidents include Exmouth, Ottery St Mary, Budleigh Salterton, Honiton, Woodbury, Sidmouth, Axminster, Clyst St Mary, Seaton and Colyton. Work was undertaken to establish whether the Drainage Water Management Plan produced by South West Water could be used to inform the sequential test, but this was not recommended (see paragraph 3.2.4 of the report).
- JBA's Groundwater Flood Risk map shows that the areas with the shallowest groundwater levels generally follow the flow paths of the major watercourses, particularly along the River Otter valley and its tributary valleys, in areas close to the River Clyst in the west of East Devon and areas in the River Exe valley.
- There are no canals identified in East Devon.
- There is a potential risk of flooding from reservoirs both within the district and from those outside. The level and standard of inspection and maintenance required under the Reservoirs Act means that the risk of flooding from reservoirs is relatively low. However, there is a residual risk of a reservoir breach, and this risk should be considered in any site-specific Flood Risk Assessments (where relevant).

2.4 Some of the key findings for the local plan are.

- A risk-based and sequential approach to development and flood risk should be adopted for all future developments within East Devon so that development is located in the lowest flood risk areas where possible.
- A cumulative impact assessment has identified which catchments in East Devon are more sensitive to the cumulative impact of development and where more stringent policy regarding flood risk is recommended (See map in Appendix 3 of this report). Any development in these areas should seek to contribute to work that reduces wider flood risk in those catchments.
- The Environment Agency consider that historic development has contributed to increased flood risk in East Devon and that new developments can reduce this risk through implementing flood compensation storage areas, Natural Flood Management (NFM), and restricting SuDS discharge rates to below greenfield runoff rates.
- EDDC should work closely with neighbouring local authorities to develop complementary Local Planning Policies for catchments that drain into and out of East Devon to minimise cross boundary issues of cumulative impacts from development.
- The cumulative impact of development should be considered at the planning application and development design stages and the

appropriate mitigation measures undertaken to ensure flood risk is not exacerbated, and in many cases the development should be used to improve the flood risk.

- New development and re-development of land should seek opportunities to reduce the overall level of flood risk at the site through SuDS, green infrastructure, creating space for flooding and considering the cumulative impact on flooding.
- Space is needed on all development sites for SuDS so that existing surface water runoff problems can be improved by encouraging runoff rates from new development to be less than greenfield rates.
- A range of measures to enhance river corridors and habitats is recommended, including natural drainage features, making space for water, restricting culverts and keeping an 8 metre strip clear of development.
- Consideration should be given to requiring contributions from developments to community flood defences outside of the application site to help offset the cumulative impact of development.
- Land identified in the [Working with Natural Processes](#) mapping within the proposed new settlement should be safeguarded.
- The long-term opportunities to remove development from the floodplain and safeguard the functional floodplain from future development to make space for water should be identified.
- In Critical Drainage Areas, new development should reduce existing runoff rates through use of SuDS.

3. Scoping work for Level 2 SFRA

3.1 It should be noted that many of the sites put forward for development in East Devon have elements of flood risk within them, but this does not necessarily rule out development since it is often possible to site development on other parts of the site away from the areas of flood risk.

3.2 To inform decisions on where additional work was needed to understand the nature and extent of the flood risk, a scoping exercise was undertaken by JBA following the Level 1 SFRA. This identified potential sites which would require further assessment through a Level 2 SFRA. 149 sites were 'screened' by JBA against flood risk datasets. The screening process resulted in a summary of risk of flooding for each site that included:

- The proportion of the site within Flood Zones or fluvial or tidal modelling data derived from the Level 1 SFRA.
- Whether there was a risk of surface water flooding (from the Risk of Flooding from Surface Water ([RoFSW](#) - Risk of Flooding from Surface Water) dataset.
- The proportion of the site in the reservoir 'wet' and 'dry' day extents.
- Any flood risk for sites in Flood Zone 1 from an 'ordinary' watercourse for which no flood zone information is currently available.

- 3.3 Sites were recommended for Level 2 assessment if more than 10% of the site area was within the following flood extents:
- Surface water 1% Annual Exceedance Probability (AEP) +65% climate change.
 - Flood Zone 2 as a proxy for climate change.
 - 0.5% AEP Tidal upper end allowance from detailed modelling.
 - 1% AEP Fluvial central allowance from detailed modelling.
- 3.4 The reservoir and historical flood risk were also considered for each site, along with location within flood warnings/alerts, defences and previous hydraulic models. Access and egress were also assessed for each site.
- 3.5 Of the 149 sites screened, 35 sites were identified as potentially needing a Level 2 assessment. Consideration was also given to each site to identify any site-specific information; for example, where detailed modelling is needed. Some sites were removed at this stage due to significant flood risk and others were reduced in size to avoid flood risk or were not taken forward to the Level 2 work due to the resource implications of additional modelling.
- 3.6 Sixteen sites are currently being assessed under the Level 2 SFRA. This work is expected to be completed in summer 2024. Summary sheets will be produced for each site and will include mapping of the actual (defended) flood risks from all sources. The sheets will include flood depth, velocity, hazard, duration and inundation timing mapping. The sites being assessed are:
- Axmi_07 – Axminster Carpets – new survey and modelling work is being undertaken.
 - Axmi_17 – Land at Millway Rise.
 - GH/ED/80a – Land East of Axminster.
 - Brcl_31 – Land at Mosshayne Lane, Pinhoe.
 - Clge_23 - Land at Dart's Farm, Topsham Road.
 - Coly_06 – Land South of Ham Lane, Colyton.
 - Exmo_50 – Exmouth Police Station.
 - Employment Land East of Airport.
 - Farr 01 - Ware's Farm, Clyst Honiton.
 - Feni_07 – Lyndale, Feniton.
 - Kilm_10 – Land west and southwest of the Old Inn, Kilmington.
 - Musb_01a – Baxter's Farm, Musbury.
 - Otry_10 – Land north and south of Salston Barton, Ottery St. Mary.
 - GH/ED/27 – Land south of Strawberry Lane, Ottery St. Mary.
 - GH/ED/43 - Land at Long Lane, adjacent to Exeter Airport.
 - Whim_11 – Land north of Station Road, Whimple

4. Conclusions

4.1 The SFRA Level 1 comprises a key part of the evidence base needed for the emerging Local Plan. Further work now needs to be undertaken on the development of policies on flood risk that take account of the findings of the SFRA. Additional work on flood risk is being undertaken by JBA to provide detailed assessments of the flood risk on a small number of sites to inform decisions on potential allocations.

Financial Implications:

There are no direct financial implications resulting from the report.

Legal Implications:

The legal issues are covered in the report.

Appendix 1 Executive summary from Level 1 SFRA report

Executive summary

This report provides a comprehensive and robust evidence base on flood risk issues to support the review and update of the East Devon Local Plan and associated Planning Policy documents using the best available information. This SFRA can be used to inform the Local Plan on the location of future development and the preparation of sustainable policies for the long-term management of flood risk, provided the potential implications of the proposed changes to the PPG are understood.

Introduction

To support the preparation of a new Local Plan for East Devon District Council, the key objectives of the assessment are:

- To update the East Devon District Council Local Plan, taking into account the most recent policy and legislation in the National Planning Policy Framework (2022).
- To collate and analyse the latest available information and data for current and future (i.e. climate change) flood risk from all sources, and how these may be mitigated.
- To inform decisions in the emerging Local Plans, including the selection of development sites and planning policies.
- To provide evidence to support the application of the Sequential Test for the allocation of new development sites, to support East Devon District Council's preparation of the Local Plan.
- To provide a comprehensive set of maps presenting flood risk from all sources that can be used as evidence base for use in the emerging Local Plan.
- To provide advice for applicants carrying out site-specific Flood Risk Assessments and outline specific measures or objectives that are required to manage flood risk.

Summary of flood risk in East Devon District

Parts of the East Devon District are at risk of flooding from the following sources: fluvial, tidal, surface water, groundwater, sewers and reservoir inundation. This study has shown that the most significant sources of flood risk in East Devon District are fluvial, tidal and surface water.

- *Fluvial flood risk:* The primary sources of fluvial flood risk in East Devon are along the River Exe, River Clyst, River Otter, River Sid, River Axe and their tributaries. These watercourses present fluvial flood risk to rural communities as well as to the main urban areas in East Devon.
- *Tidal flood risk:* The areas identified most at risk of tidal flooding are Exmouth, Budleigh Salterton, Sidmouth and Seaton. In some places along the coastline, such as settlements along the Exe estuary, tidal flood risk can occur in combination with fluvial and surface water sources which can exacerbate flood risk.
- *Surface water flood risk:* The Risk of Flooding from Surface Water map shows a number of prominent overland flow routes; these predominantly follow topographical flow paths of existing watercourses or dry valleys with some isolated ponding located in low lying areas. There are also considerable flow routes following the roads through the main urban areas of Buckerell, Kilminster, Cranbrook and Clyst St Mary. All of which are designated as a Flood Risk Area due to surface water flooding.
- *Sewer flood risk:* South West Water historical hydraulic flood incident records have been used to identify areas which have experienced sewer flooding. Areas with recorded sewer flooding incidents include Exmouth, Ottery St Mary, Budleigh Salterton, Honiton, Woodbury, Sidmouth, Axminster, Clyst St Mary, Seaton and Colyton.

- *Groundwater flood risk:* JBA's Groundwater Flood Risk map shows the areas with the shallowest groundwater levels generally follow the flow paths of the major watercourses in East Devon District, particularly along the River Otter valley and its tributary valleys, in areas close to the River Clyst in the west of East Devon district and areas in the River Exe valley.
- *Flooding from canals:* There are no canals identified in East Devon.
- *Flooding from reservoirs:* There is a potential risk of flooding from reservoirs both within the district and those outside. The level and standard of inspection and maintenance required under the Reservoirs Act means that the risk of flooding from reservoirs is relatively low. However, there is a residual risk of a reservoir breach and this risk should be considered in any site-specific Flood Risk Assessments (where relevant).

Defences

Flood defences are located along parts of each main river in the district. The majority of these defences are as natural high ground, however formal defences are located in Stoke Canon, Clyst St Mary, Exmouth, Budleigh Salterton, Ottery St Mary and Axmouth.

Development and flood risk

The Sequential and Exception Test procedures for both Local Plans and Flood Risk Assessments have been documented, along with guidance for planners and developers. Links have been provided for various guidance documents and policies published by other Flood Risk Management Authorities such as the Lead Local Flood Authority and the Environment Agency.

When necessary, development and redevelopment within East Devon District will require a Flood Risk Assessment appropriate to the scale of the development and to the scope as agreed with the Lead Local Flood Authority and/or Environment Agency. Flood Risk Assessments should consider flood risk from all sources including residual risk, along with promotion of Sustainable Drainage Systems to create a conceptual drainage strategy and safe access/egress at the development in the event of a flood. Latest climate change guidance (last updated in May 2022) should also be taken into account, for the lifetime of developments. Planners and developers must ensure that modelling in line with the most up to date Environment Agency climate change guidance has been run.

How to use this report

Planners

This Level 1 Strategic Flood Risk Assessment (SFRA) 2024 is an update to the 2008 document is published as part of the evidence base for the emerging Local Plan. The report has updated the content that was included in the previous SFRA to provide appropriate supporting evidence for the resubmission of the Local Plan. This includes how the cumulative impact of development should be considered. It provides the latest flood risk data and guidance to inform the Sequential Test and provides guidance on how to apply the Exception Test. The Council can use this information to apply the Sequential Test to strategic allocations and identify where the Exception Test will also be needed.

The SFRA provides guidance for developers, which can be used by development management staff to assess whether site-specific Flood Risk Assessments meet the required quality standard.

Developers

For sites that are not strategic allocations, developers will need to use this SFRA to help apply the Sequential Test. For sites which fall into the following categories, whether strategic allocations or windfall sites, developers will need to apply the Exception Test and use information in a site-specific Flood Risk Assessment to inform this test at planning application stage.

- Highly vulnerable and in Flood Zone 2
- Essential infrastructure in Flood Zone 3a or 3b
- More vulnerable in Flood Zone 3a

This is a strategic assessment and does not replace the need for site-specific Flood Risk Assessments. A Flood Risk Assessment is needed for developments:

- in Flood Zones 2 or 3
- more than 1 hectare in Flood Zone 1
- less than 1 hectare in Flood Zone 1, including a change of use in development type to a more vulnerable class, where they could be affected by sources of flooding other than rivers and sea (for example surface water or reservoir flooding)
- in an area within Flood Zone 1 which has critical drainage problems as notified by the Environment Agency
- land identified in an SFRA as being at increased risk in the future

In addition, a surface water drainage strategy will be needed for all major developments in any Flood Zone to satisfy Devon County Council, the Lead Local Flood Authority (LLFA).

Developers can use the information in this SFRA, alongside site-specific research to help scope out what additional work will be needed in a detailed Flood Risk Assessment. To do this, they should refer to Section 5, Section 8, and the attached Appendices (PDF mapping) A-Q. At the planning application stage, developers may need to undertake more detailed hydrological and hydraulic assessments of the watercourses to verify flood extent (including latest climate change allowances, last updated in May 2022), inform master planning and demonstrate, if required, that the Exception Test is satisfied. As part of the Environment Agency's updated guidance on climate change, which must be considered for all new developments and planning applications, developers will need to undertake a detailed assessment of climate change as part of the planning application process when preparing FRAs. Developers need to ensure that new development does not increase surface water runoff from a site or contribute to cumulative effects at sensitive locations, see Section 7. Section 9 provides information on the surface water drainage requirements of the LLFA. Sustainable Drainage Systems should be considered early in the development process, helping to minimise costs and overcome any site-specific constraints.

Site-specific Flood Risk Assessments will need to identify how flood risk will be mitigated to ensure the development is safe from flooding. In high-risk areas, the site-specific Flood Risk Assessment will also need to consider emergency arrangements, including how there will be safe access and egress from the site. Residual risk is the risk that remains after mitigation measures are considered. The residual risk includes the consideration of flood events that exceed the design thresholds of the flood defences or circumstances where there is a failure of the defences, e.g. flood banks collapse. Residual risks should be considered as part of site-specific Flood Risk Assessments.

Any developments located within an area protected by flood defences and where the standard of protection is not of the required standard (either now or in the future) should be identified and the use of developer contributions considered to fund improvements.

Neighbourhood plans

The SFRA provides:

- Information on the sources of flooding and the variation in the risk across the District.
- Identification of organisations that are involved in flood risk management and their latest strategic plans and plans for major flood defences.
- The requirements for detailed Flood Risk Assessments and to inform the site selection process.

Neighbourhood planning groups can use this information to assess the risk of flooding to sites within their community, using Section 5, the sources of flooding in the East Devon District and the flood mapping in the appendices. The SFRA will also be helpful for developing community level flood risk policies in high flood risk areas. Similarly, all known available recorded historical flood events for the district are listed in Section 5.1 and this can be used to supplement local knowledge regarding areas worst hit by flooding. Ongoing and proposed flood alleviation schemes planned by East Devon District Council and the Environment Agency are outlined in Section 6 and Section 8.3 discusses mitigations, resistance and resilience measures which can be applied to alleviate flood risk to an area.

Cumulative Impact Assessment

A cumulative impact assessment has been carried out and has identified which catchments in East Devon are more sensitive to the cumulative impact of development and where more stringent policy regarding flood risk is recommended. Any development in these areas should seek to contribute to work that reduces wider flood risk in those catchments.

Appendix 2 Structure of Level 1 SFRA report and how to use it.

Section	Contents	How to use
Executive Summary	Focuses on how the SFRA can be used by planners, developers and neighbourhood planners	Summarises the Level 1 contents.
1. Introduction	<p>Provides a background to the study, the Local Plan stage the SFRA informs, the study area, the roles and responsibilities for the organisations involved in flood management and how they were involved in the SFRA</p> <p>Provides a short introduction to how flood risk is assessed and the importance of considering all sources</p> <p>Includes this table of the contents of the SFRA</p>	For general information and context.
2. Flood Risk policy and strategy	Sets out the relevant legislation, policy and strategy for flood risk management at a national, regional and local level.	Users should refer to this section for any relevant policy which may underpin strategic or site-specific assessments.
3. Planning policy for flood risk management	<p>Provides an overview of both national and existing Local Plan policy on flood risk management</p> <p>This includes the Flood Zones, application of the Sequential Approach and Sequential/Exception Test process.</p> <p>Provides guidance for East Devon District Council and Developers on the application of the Sequential and Exception Test for both allocations and windfall sites, at allocation and planning application stages.</p>	Users should refer to this section to understand and follow the steps required for the Sequential and Exception Tests.
4. Impact of Climate change	Outlines the latest climate change guidance published by the Environment Agency	This section should be used to understand the

Section	Contents	How to use
	<p>and how this was applied to the SFRA</p> <p>Sets out how developers should apply the guidance to inform site specific Flood Risk Assessments</p>	<p>climate change allowances for a range of epochs and conditions, linked to the vulnerability of a development.</p>
<p>5. Understanding flood risk in East Devon District</p>	<p>Provides an overview of the characteristics of flooding affecting the study area and key risks including historical flooding incidents, flood risk from all sources and flood warning arrangements.</p>	<p>This section should be used to understand all sources of flood risk in the district, including where has flooded historically. This section may also help identify any data gaps, in conjunction with the attached Appendices.</p>
<p>6. Flood alleviation schemes and assets</p>	<p>Provides a summary of current flood defences and asset management and future planned schemes. Introduces actual and residual flood risk.</p>	<p>This section should be used to understand if there are any defences or flood schemes in a particular area, for further detailed assessment at site-specific stage.</p>
<p>7. Cumulative impact of development and strategic solutions</p>	<p>This section provides an introduction to the cumulative impact assessment (CIA).</p>	<p>Planners should use this section to help develop policy recommendations for the cumulative impact of development.</p>
<p>8. Flood risk management requirements for developers</p>	<p>Guidance for developers on Flood Risk Assessments, considering flood risk from all sources.</p>	<p>Developers should use this section to understand requirements for FRAs and what conditions/ guidance documents should be followed, as well as mitigation options.</p>
<p>9. Surface water management and SuDS</p>	<p>An overview of Sustainable Drainage Systems, Guidance for developers on Surface Water Drainage Strategies, considering any specific local standards and guidance for Sustainable Drainage</p>	<p>Developers should use this section to understand what national, regional and local SuDS standards are applicable.</p>

Section	Contents	How to use
	Systems (SuDS) from the Lead Local Flood Authority.	Hyperlinks are provided.
10. Strategic flood risk measures	Outlines different options which could be considered for strategic flood risk solutions.	Developers should use this section to understand strategic flood risk solutions.
11. Level 1 summary assessment of potential development locations	Summarises the flood risk to potential development locations.	This section should be used to understand flood risk to potential development locations.
12. Summary	Summarises sources of flood risk in the study area	Developers and planners should use this as a summary of the SFRA.
13. Recommendations	Outlines planning policy recommendations	Developers should refer to the Level 1 SFRA recommendations when considering requirements for site-specific assessments.
Appendices	<ul style="list-style-type: none"> • Appendix A: Historic Flooding • Appendix B: Watercourses • Appendix C: Flood Zones • Appendix D: Fluvial and Tidal Climate Change • Appendix E: Risk of Surface Water Flooding • Appendix F: Risk of Surface Water Flooding with Climate Change • Appendix G: Groundwater Flooding • Appendix H: Reservoir Flooding • Appendix I: Flood Defence • Appendix J: Flood Warning and Alerts • Appendix K: Data sources used in the SFRA • Appendix L: SFRA User Guide • Appendix M: Summary of flood risk across the Borough 	Planners should use these appendices to understand what data has been used in the SFRA, to inform the application of the Sequential and Exception Tests, as relevant, and to use these maps and tabulated summaries of flood risk to understand the nature and location of flood risk.

Section	Contents	How to use
	<ul style="list-style-type: none">• Appendix N: Site screening• Appendix O: Sequential Test Recommendation• Appendix P: Surface Water Zone• Appendix Q: Coastal Change Management Area	

Appendix 3 Map of Cumulative impact assessment catchment ranking (Figure 7.1 from SFRA Level 1 report)



