

Local Plan Panel Meeting	
Meeting Date	02 December 2020
Report Title	Level 2 Strategic Flood Risk Assessment
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning
SMT Lead	James Freeman
Head of Service	James Freeman
Lead Officer	Aaron Wilkinson
Key Decision	No
Classification	Open
Recommendations	It is recommended that Members note the content of the Level 2 Strategic Flood Risk Assessment and agree that it be published and used as part of the evidence base for the Local Plan Review.

1 Purpose of Report and Executive Summary

- 1.1 A Level 2 Strategic Flood Risk Assessment (SFRA) has been prepared as part of the evidence base supporting the Local Plan Review (LPR) and the purpose of this report is to advise of its key conclusions and recommendations.
- 1.2 The Level 2 SFRA, available at Appendix I, provides site specific guidance for a number of sites that have been considered as part of the LPR process and pose flood risks. It should be used in conjunction with the Level 1 SFRA and Sequential Test that were published and reported to Members in November 2019 and June 2020.
- 1.3 In particular, it provides guidance and recommendations for the proposed allocation at Rushenden South (referred to in the Level 2 SFRA as 'Land at the Port of Sheerness', the name it was given when originally submitted).

2 Background

- 2.1 Members will be aware that local plans must take account of, and manage flood risk from all sources, both now and in the future. Inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at highest risk (existing and future). Where development is necessary in such areas, the development should be made safe for its lifetime. Strategic policies, such as those setting out spatial strategies, should be informed by strategic flood risk assessments.
- 2.2 A Level 1 SFRA was completed and reported to this panel in November 2019. It assessed and mapped all sources of flooding across the Borough, including the impact of climate change upon them. It also provided a high-level screening

assessment of the sites that had been promoted to the Council as part of its 'Call for Sites' exercises in 2017 and 2018.

- 2.3 Using the Level 1 SFRA, a Sequential Test was completed and reported to this panel in June of this year which demonstrated the proportion of each site falling within each flood zone. This allowed Officers and Members to identify sites at a lower risk of flooding. It was stated, and noted by this panel, that any sites being progressed which posed a flood risk and failed the Sequential Test would require an Exceptions Test.
- 2.4 Following the recommendations made in the Level 1 SFRA, existing hydraulic models were updated in the Local Plan area to better understand how flood risk to individual sites in the Local Plan area may change due to the impacts of climate change. Climate changes uplifts were applied to the North Kent Coast tidal model and the Scrapsgate fluvial model, based on new allowances published by the Environment Agency, these being based on the UKCP18 projections. Furthermore, Level 1 SFRA mapping for the whole borough will be updated with UKCP18 data as part of the Level 2 SFRA commission.
- 2.5 The Exceptions Test seeks evidence that sites with a higher risk of flooding would provide wider sustainability benefits to the community that outweigh the flood risk and that any development on them would be made safe for its lifetime by clearly demonstrating that any risks could be mitigated. Exceptions Tests need to be informed by site specific strategic flood risk assessments and should take into account the impacts of climate change in the future.
- 2.6 At the meeting of this panel on 29th October 2020, 17 sites for allocation in the LPR were selected. Of these, 16 are in Flood Zone 1 and are at the lowest risk of flooding. Some of these do pose some surface water flooding risks and the relevant allocation policies will include requirements for appropriate mitigation.
- 2.7 However, one of the selected sites, Rushenden South, poses a more significant flood risk. Its allocation will therefore require the Exceptions Test to be satisfied. To assist with this, a site-specific Level 2 SFRA has been completed which considers the risks at the site in more detail. It should be noted that it also considers the risks for 8 other sites which would have required more detailed assessment too. Due to the current timetable for the LPR, this work had to be commenced before Members selected sites last month, and when a wider range of sites were still under consideration. As such, a wider range of sites were also included in the Level 2 SFRA, in case they were selected by Members.
- 2.8 A summary of the key points for Rushenden South is as follows:
 - Most of the site flooded during the February 1953 flood event.
 - With defences now in the area, current flood extents on the site are limited to its fringes except for the northern peninsula and south east corner where more significant flooding occurs.

- It may be possible to adopt a sequential approach to the layout of the site so that more vulnerable development is located outside of Flood Zones 3a and 3b.
- However, modelling does show the site to be very sensitive to the impacts of climate change with significant increases in flood extents for both the 2080 and 2120 scenarios.
- Existing defences would need improving to ensure that development would be safe for its lifetime.
- In the event of a flood, there is a risk that the centre of the site could become a 'dry island' with no safe access and egress. Development of the site would need to provide such access/egress.
- Surface water flood extents are minimal, with the greatest risk at the industrial area to the east of the site.
- There are no identified groundwater flood risks, but it is acknowledged that there are locally known problems.
- There are a number of watercourses across the site which have been culverted, resulting in a risk from blockages.
- Due to its isolation, the site is unlikely to result in cumulative impacts and increased flooding elsewhere.

2.9 Taking these points into account, and to pass the Exceptions Test, evidence will need to show that the identified issues can be mitigated such that development of the site would be safe for its lifetime, without increasing flood risk elsewhere. The site promoters of Rushenden South are currently in the process of providing such evidence, working closely with relevant agencies including the Environment Agency.

2.10 Once all the evidence has been completed, an Exceptions Test will need to be prepared by the Council.

3 Proposals

3.1 The proposal, therefore, is that Members note the content of the Level 2 SFRA and agree that it be published and used as part of the evidence base for the LPR.

4 Alternative Options

4.1 As a site which poses a significant flood risk is being progressed through the LPR, this more detailed SFRA is essential. The site will not be able to proceed without it and, as such, there are no reasonable alternatives to that proposed in paragraph 3.1 above.

5 Consultation Undertaken or Proposed

5.1 Officers are engaging with relevant agencies, including the Environment Agency, Kent County Council and the Lower Medway Internal Drainage Board, regarding Rushenden South. Furthermore, when the LPR is consulted on at the Regulation

19 stage, consultees will be able to make comments on this document if they wish to.

6 Implications

Issue	Implications
Corporate Plan	The proposals would align with: Priority 1: Building the right homes in the right places and supporting quality jobs for all. Priority 2: Investing in our environment and responding positively to global challenges.
Financial, Resource and Property	None identified at this stage – the work has been carried out within the Planning Policy budget.
Legal, Statutory and Procurement	Production of the LPR is a statutory requirement.
Crime and Disorder	None identified at this stage.
Environment and Sustainability	The LPR will be subject to a Sustainability Appraisal and seeks to deliver sustainable development.
Health and Wellbeing	The LPR seeks to deliver sustainable development which includes enhanced opportunities to improve health and wellbeing.
Risk Management and Health and Safety	Development allocated in the LPR needs to demonstrate that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reducing overall flood risk.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Level 2 Strategic Flood Risk Assessment

8 Background Papers

8.1 Level 1 Strategic Flood Risk Assessment

[https://services.swale.gov.uk/assets/Planning-General/Planning-Policy/SFRA%202020/2020%20Swale%20Borough%20Council%20Level%201%20SFRA%20\(1\).pdf](https://services.swale.gov.uk/assets/Planning-General/Planning-Policy/SFRA%202020/2020%20Swale%20Borough%20Council%20Level%201%20SFRA%20(1).pdf)

8.2 Sequential Test

<https://services.swale.gov.uk/meetings/documents/s14710/Appendix%20I%20-%20Sequential%20Test.pdf>