Development and Flood Risk Guidance Note – April 2013

Introduction

This guidance is intended to assist in the preparation and determination of planning applications submitted to North Lincolnshire Council and builds on the information given in Appendix E of the Strategic Flood Risk Assessment (SFRA) (both the SFRA and this guidance should be used).

The SFRA 2011 has been prepared jointly by North Lincolnshire Council and North East Lincolnshire Council in consultation with the Environment Agency and Internal Drainage Boards where appropriate. This SFRA covers the whole of North Lincolnshire and North East Lincolnshire and it replaces the adopted 2006 SFRA that was also jointly prepared. North Lincolnshire Council has played a lead role in producing this document. It supplement's the policies in the Core Strategy Development Plan Document (DPD- adopted June 2011) and the North Lincolnshire Local Plan (NLLP- adopted May 2003) that relate to flood risk and development (Core Strategy Policy CS19: Flood Risk and saved NLLP Policy DS16: Flood Risk). In August 2012 the SFRA 2011 was officially noted by the council as the current SFRA guidance that has material weight as evidence in the consideration of development plan policies, allocations and planning applications.

This guidance note provides local advice to developers, applicants and council officers on the application of national planning policy contained within the National Planning Policy Framework (NPPF) which aims to avoid inappropriate development in areas of flooding by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

Technical Guidance to the NPPF was published alongside the NPPF to provide additional guidance to local planning authorities to ensure the effective implementation of the planning policy set out in the NPPF on development in areas at risk of flooding. The guidance retains the key elements of Planning Policy Statement 25: Development and Flood Risk which required the following.

- The preparation of a Strategic Flood Risk Assessment (SFRA) as a basis for informing local planning decisions and providing a starting point for site-specific Flood Risk Assessments
- The application of a Sequential Test to ensure that new development is located in areas at lowest risk of flooding as far as possible
- The application of an Exception Test for specific types of proposal in instance where alternative sites in lower flood risk areas are not available, in order to determine the development is justified and whether it can be made safe.

This note provides guidance on each of these aspects with the following step by step approach:

- Step 1: Identifying the level of flood risk
- Step 2: Determining compatibility between proposed development and flood zones
- Step 3: Deciding whether the Sequential Test is required
- Step 4: Compiling information for the Sequential Test
- Step 5: Deciding whether the Exception Test is required
- Step 6: Preparing site-specific Flood Risk Assessment

It is the responsibility of the Local Planning Authority (LPA) to produce a SFRA (in agreement with the Environment Agency) and make decisions on the Sequential Test and the first part of the Exception Test (in relation to wider community benefit). The Environment Agency (EA) inputs into whether the last part of the Exception Test is passed in relation to whether safe development can be achieved on and off-site. The EA flood maps publicised on the EA website give an understanding of how the probability of flooding varies across an area. They do not take into account existing flood defences and are based on present conditions so do not include an allowance for climate change. The SFRA provides a more detailed analysis of flood risk from all sources in the area. Accordingly, the EA Flood Zones are different to the SFRA Flood Zones. However, the EA flood maps are updated on a regular basis and still should be referenced. The issue of flood risk and how it is addressed will continue to be refined and be more accurate with new modelling as time progresses – this point alone will lead to Flood Zones being altered.

Step 1: Identifying the level of flood risk

The SFRA provides detailed/ locally specific flood risk information showing the extent of the SFRA Flood Zones 1, 2/3a and 3b and it should be used as a starting point for progressing site specific flood risk assessments. It provides an overview of:

- The types of flooding which may be expected to occur in the area
- The main sources of flooding: from the sea (tidal), flooding from rivers (fluvial), flooding from surface water and ground water as a result of precipitation effects (rainfall etc.) and historic flooding events
- The predicted influences of climate change based on Government predicted flood defence tables
- Guidance on applying, where appropriate, Sequential and Exception Tests as required by the NPPF
- Level 1 and Level 2 (where appropriate) Flood Risk Assessment
- A Flood Risk Response Matrix split into development categories to help guide future development proposals
- Guidance and requirement on applying Sustainable Drainage Systems, Flood Mitigation and Flood Resilience measures in relation to proposed development

The following flood zones have been identified from highest to lowest risk.

EA Flood Zone 3 (b) - Functional Floodplain

EA Flood Zone 3(b) refers to areas within Zone 3 which have been identified by the EA as functional floodplain.

SFRA Flood risk Zone 2/3 (a) – Medium/High Probability

Where EA Flood Zones 2 and 3a have been assessed and merged.

SFRA Flood Zone 1 – Low Probability

SFRA Flood Zone 1 refers to all areas outside of SFRA Flood Zone 2/3a where the probability of either river or tidal and coastal flooding is low.

It should be noted that no land area is free from flood risk and the Flood Zones cover all of North Lincolnshire. This point is emphasised by NPPF requiring a Flood Risk Assessment for development proposals of 1 ha or greater in Flood Zone 1 (SFRA Flood Zone 1) which would result in an increase in surface water run-off. Where development is proved to be acceptable in any of the Flood Zones the council expect developers to reduce the overall level of flood risk in these areas on and off-site through the layout and form of the development and to apply sustainable drainage systems that control surface water run-off close to where it falls and mimic natural drainage as closely as possible.

The reasons for merging EA Flood Zones 2 and 3a into SFRA Flood Zone 2/3a (medium/high probability) are set out in SFRA paragraphs 4.20 and 4.21. Essentially the water levels in the Humber Estuary were available (in table forms) from the Environment Agency's Humber Flood Risk Management Strategy to determine the tidal flow compartments Flood Zone 3a area. No tables are available to determine the water levels to calculate the EA Flood Zone 2 area. The information on known river levels cannot currently be easily and accurately adjusted to take account of climate change consistently across the whole SFRA study area. Also potentially little development pressure exists in EA Flood Zone 2.

The SFRA therefore does not address any flood modelling of the EA Flood Zone 2 area and as a precaution EA Flood Zone 2 has been merged with EA Flood Zone 3a to form SFRA Flood Zone 2/3a. This means that EA Flood Zone 2 has been included within the higher probability of flooding in the SFRA and for any development proposal it will be for individual flood risk assessments to treat EA Flood Zone 2 as a high flood risk area (within SFRA merged Flood Zone 2/3a) and determine the level of actual flood risk within the EA Flood Zone 2 area accordingly.

The 'Atkins Flood Risk and Development Report: Brigg (2000)' was incorporated as evidence towards supporting development sites in Brigg in the adopted North Lincolnshire Local Plan (2003). The Atkins Report is still relevant to the SFRA as evidence of a more detailed flood risk assessment of Brigg and reference should be made to it accordingly in relation to future development opportunities.

A SFRA is required to give consideration to Level 1 and Level 2 Assessments in accordance with technical flooding guidance appended to the NPPF.

The SFRA Level 1 Assessment shows the boundary between SFRA Flood Zone 1 and SFRA Flood Zone 2/3a, covering government climate change predictions, flooding from both sea and rivers, together with functional floodplain (SFRA Flood Zone 3(b)) and areas where drainage problems may lead to flooding from other sources.

SFRA Level 2 Assessments are more detailed assessments undertaken for areas within high flood risk zones (in this case SFRA Flood Zone 2/3a) where flood defences provide an acceptable standard of protection and where there are likely to be significant development pressures. 'Providing an acceptable standard of protection' has been taken as being high enough to prevent overtopping by still water levels having a 1 in 100 or less (<1%) annual probability of occurring in a river or a 1 in 200 or less (<0.5%) annual probability of occurring in the estuary and tidal river each year. The aim of the SFRA Level 2 Assessment is to determine how the level of hazard (water depth and velocity) to people will vary across the area the flood defences protect, if the flood defences fail during an extreme event (one which would flood all of SFRA Flood Zone 2/3).

A SFRA Level 2 Assessment applies to Flood Compartments 1T1, 1T2 and 1T3 in the Eastern Coastal Zone covering the high probability of flooding occurrence from the sea likely to affect the large urban development areas of Cleethorpes and Grimsby (both North East Lincolnshire) and the extensive offer of development opportunities at the South Humber Bank Ports (North Lincolnshire). Flood Compartment 1T3 is within North Lincolnshire and covers the South Humber Bank Port Development area stretching from the northern end of Immingham Dock to East Halton Skitter.

The "Western Scunthorpe Urban Extension Exception Test Strategy May 2010", has been produced separately on the Lincolnshire Lakes area within flood compartment 3T3. This guidance provided detailed technical evidence (more than a SFRA Level 2 Assessment) for North Lincolnshire Council's Core Strategy but has been withdrawn from the SFRA as work progresses on the Lincolnshire Lakes Area Action Plan.

Applying a SFRA Level 2 Assessment to Flood Compartment 1T5 (Barton upon Humber) was considered but given the required costly detailed modelling and the reduced likelihood of future development opportunities within SFRA Flood Zone 2/3a, a Level 1 Assessment only was deemed appropriate. Detailed flood risk assessment of future development opportunities within the high flood risk area in Flood Compartment 1T5 will therefore have to be applied accordingly.

Step 2: Determining compatibility between proposed development and flood zones

If Step 1 identifies that the development proposal lies within SFRA Flood Zone 1 and is not affected by flood risk from surface water or sewers/ drains, applicants can proceed straight to Step 6 as there are no flooding constraints. If the development proposal is in SFRA Flood Zone 1, but lies within a surface water and/ or drainage risk zone, applicants should proceed to Step 3.

If the development proposal lies within SFRA Flood Zone 2/3a applicants need to take into account the flood risk vulnerability of the proposed development identified in Table 2 of the NPPF Technical Guidance and proceed to Step 3. SFRA Flood Zone 3 (b) is functional flood plain where development will not be allowed unless development is deemed to be water compatible (land uses are listed in the NPPF) and does not affect the potential functional flood use of the land.

Functional flood plain is currently identified in only three areas within North Lincolnshire and these areas are known as the Goxhill bend of the Humber Estuary, Alkborough Flats (where the River Trent joins the Humber) and Flixborough Grange (near to Burton Stather and Flixborough). The council therefore do not expect development proposals to be located within the functional flood plain (except water compatible). For this reason the following sections (except for the safe development section) do not include a reference to functional flood plain (SFRA Flood Zone 3(b)). This leaves SFRA Flood Zones 2/3a as the area of medium and highest flood risk where development proposals will be required to apply the tests and assessments explained in this document.

Step 3: Identifying whether the Sequential Test is required

The Sequential Test is a risk-based tool applied at all stages of the planning process. It aims to steer new development to areas at the lowest probability of flooding (SFRA Flood Zone 1).

Development proposals in areas at risk of flooding will only be approved if the applicant can successfully demonstrate to the council that there are no reasonable alternative sites within a lower flood risk area available to accommodate the proposed development and the proposed uses are suitable in terms of their vulnerability.

A Sequential Test is required for the majority of development proposals in SFRA Flood Zone 2/3a or in areas that may be susceptible to flooding from surface water and/or drainage systems.

There are a number of exemptions from the Sequential Test suggested in the NPPF which include the following:

- Individual developments on sites allocated in a development plan which have been through the Sequential Test process during the preparation of the plan.
- Applications for minor development and change of use except for any proposals involving a change of use to a caravan, camping or chalet site or to a mobile home or park home site where the Sequential Test and Exception Test should be applied as appropriate.
- Subdivision of Dwellings: Although the subdivision of a house into flats is specifically excluded from the definition of minor development, where no significant external alternations are required, it will be viewed as a Change of Use application and so a Sequential Test would not be required, provided after the sub-division all ground floor accommodation has permanent access to a place of safety. So the sub-division of a dwelling into two or more dwellings would not require a Sequential Test provided it does not involve significant external alterations/extensions and all ground floor accommodation has access to a higher floor that will act as a suitable refuge in time of flood. .
- Replacement dwellings: These will not normally require a Sequential Test provided they do not expose people to an increase in flood risk and, in particular, do not:

    i. Increase the number of bedrooms

ii. Replace houses having more than one floor with single-storey dwellings

iii. Increase the number of dwellings in an area of flood risk (i.e. by replacing a single dwelling with an apartment block)

iv. Does not increase the volume of building by more than 20% of the original

v. Will not be placed at an unacceptable level of flood risk, irrespective of the risk posed to the existing dwelling.

- The principles of replacement dwellings will also be applied to new applications on sites that have existing unimplemented permission (i.e. the permission is still live) and for applicants to renew existing residential permissions. For proposals on sites with lapse permission a Sequential Test will be required.

If the Sequential Test is required proceed to Step 4.

If the Sequential Test is not required but all or part of the Exception Test is required proceed to Step 5.

If neither the Sequential Test and or the Exception Test are required proceed to Step 6.

Step 4: Undertaking the Sequential Test

If a Sequential Test is required to be carried out as part of the development proposal then the applicant must provide the relevant information as part of their planning application to enable the council to assess whether the Sequential Test has been satisfactory undertaken and whether it has passed or failed. The council will need evidence of:

- The area of search that has been used to assess alternative sites
- The alternative sites that have been considered at lower flood risk within the area of search
- Assessment and explanation of whether those alternative sites are reasonably available.

Area of Search

The council expects that the area of search for most forms of development will be the individual settlement development limit as laid out in the development plan. This approach is supported by the Core Strategy DPD which aims to deliver sustainable development by promoting growth in the most sustainable settlements in North Lincolnshire and supporting thriving rural communities by allowing small scale infill development within rural settlements that maintains their viability and meets identified local needs.

Based on the Core Strategy DPD spatial distribution the council has carried out a Sequential Test of the potential housing (10 or more dwellings) and employment sites within Scunthorpe and the Market Towns of Barton upon Humber, Brigg, Crowle, Kirton in Lindsey and Winterton which have been identified through the Strategic Housing Land Availability Assessment and Employment Land Review.

For individual planning applications on a site or in settlements that have not been sequentially tested through work that has been carried out by the council in preparing the Local Development Framework, the applicant must provide evidence to demonstrate that alternative sites in lower flood risk zones within the settlement development limit have been assessed.

Brownfield sites (not Sequential Tested in the Development Plan process) will inevitably become available at any given time. These sites will give the potential for regeneration that will allow an appropriate land use, improve the character of the area and benefit the community. Where such sites become available within the main growth areas of Scunthorpe and the Market Towns they will offer a unique development opportunity to the settlement

in which the site is located within. In such cases the area of search will therefore be limited to the individual settlement limit the site is located within.

Development with specific location requirements

Where a development proposal will be operationally linked to an existing business (including agriculture) the Sequential Test will only be applied to that land within which the operational link can be maintained. If the current development is located in SFRA Flood Zone 2/3a the applicant will still need to demonstrate (where necessary) that the Exception Test is passed and the sequential approach.

Development proposals for a separate use will be required to undertake a Sequential Test.

Identifying reasonably available alternative sites

A 'reasonable available alternative site' is a site that is considered deliverable and developable and is in a lower flood risk area within the appropriate area of search within a settlement. For a site to be considered deliverable it must be:

- Available: the site is available now for development and is being advertised for sale by the landowner, estate agents or on the internet
- Suitable: the site offers a suitable location for development now and would contribute to the creation of sustainable mixed communities
- Achievable: there is reasonable prospect that housing will be delivered on the site within five years

For a site to be considered developable it must be located in a suitable location for development and there is a reasonable prospect that the site is available and could be developed at the point envisaged. This is a complicated issue to resolve and the Local Planning Authority (LPA) strongly advises all potential applicants/ agents to engage in pre-application discussions with the LPA.

To help in this process the following paragraphs can be used as a guide towards what is and is not considered a "reasonably alternative available site" within North Lincolnshire.

If the proposed development is located in SFRA flood zones 2/3a examples of alternative sites considered reasonably available are as follows:

- If an alternative site in a lower flood zone is located within the settlement in which the development is proposed
- If an alternative site in a lower flood zone is allocated for development within the same settlement as the proposed development and has planning permission, where the existing owner/developer is willing to sell the alternative site to the applicant of the proposed development. Paragraph 1.26, below explaining what is not considered "a reasonably available alternative site".
- If an alternative site in a lower flood zone is not allocated for development within the same settlement as the proposed development but has planning permission the same criteria shall apply as explained in the second bullet point above.

If the proposed development is located in SFRA flood zone 2/3a and examples of alternative sites not considered reasonably available are as follows:

- If an alternative site in a lower flood risk zone is located outside of a settlement development limit boundary in which the development is proposed
- If an alternative site is in a lower flood risk zone and has planning permission but the applicant can prove to the LPA that the existing owner/developer of the land will not sell the land to the applicant

because of an intention to develop by the existing owner/developer during the length of time the permission is extant. This applies to existing full and outline planning permissions. In the case of an outline planning permission the alternative site will not be considered a reasonable alternative if it can be proved that the existing developer/owner has an intention to apply for approval of reserved matters and develop the site under an approval of reserved matters.

The LPA also notes that a recent appeal decision stated that "the fact that the appellant personally has no alternative sites within her ownership does not have a bearing on the application of the policies of PPS25 in the public interest". This statement relates to the fact that the appellant has no other land ownership. The LPA agree that such a reason on its own does not justify a proposed development. However, it is considered that the examples given above relating to the definition of reasonable alternative available sites takes this issue a step further. The examples given above include evidence to be submitted to the LPA that describes the proposed developer having made every possible reasonable effort to purchase a site which has planning permission. If the applicant/agent can prove through open book negotiations and written evidence to the LPA that such a process has been rigorously addressed in line with the above bullet points the LPA may conclude that such a site with planning permission is not reasonably available.

The LPA is also aware of sites that have been given planning permission previously and have not been fully developed, leaving potential housing plots either vacant or taken up as additional garden land. It is possible that after the application of subsequent Strategic Flood Risk Assessments these vacant plots can become located in SFRA flood zone 2/3a and in these cases the LPA will allow the Sequential Test to be passed as the intention to develop under the original planning permission should be given a positive weighting in favour of development. Such vacant sites can result in planning blight and affect the character of the development itself and the area as a whole. It is not therefore reasonable to assess such sites against other reasonably alternative available sites. However, the Exception Test must be applied in these cases.

In addition to the note included in the "area of search" section regarding "brownfield sites appropriate for regeneration" that are not sequentially tested through the Development Plan process, the LPA recognise that such sites are likely to be considered to be a unique opportunity within a settlement boundary of any one of the main growth settlements of Scunthorpe and the Market Towns(for the reasons given). The LPA therefore recognise that this is likely to result in no reasonable alternative site. However, applicants must show that this is the case in the assessment of sites within the relevant settlement boundary, and if so, the Exception Test must be applied in these cases.

Step 5: Determining whether the Exception Test is required

If the Sequential Test determines that there are no reasonably available alternative sites in the lower flood risk then it may be necessary to then apply the Table 3 Flood Risk Vulnerability and flood zone 'compatibility' of the Technical Guidance NPPF identified below:

NPPF Table 3: Flood risk vulnerability and flood zone' compatibility'

Flood risk vulnerability classifications (see table 2)		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood Zone (See Table 1)	Zone 1	√	√	√	√	√
	Zone 2	√	√	Exception Test required	√	√
	Zone 3a	Exception Test required	√	×	Exception Test required	√
	Zone 3b functional floodplain	Exception Test required	√	×	×	×

If the Exception Test is not required, go to step 6

If the Exception Test is required, continue with the rest of Step 5 as follows.

Definition

For the Exception Test to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. The applicant is required assess the development proposal against the Core Strategy Development Plan Document Sustainability Appraisal (See Appendix 1).
- A site specific Flood Risk Assessment (FRA) must demonstrate that the development will be safe without increasing flood risk elsewhere and where possible, will reduce flood risk overall.

Wider Sustainable Benefit

When applying the Exception Test for planning applications the developer is expected to provide evidence that will allow the LPA to decide whether the development proposal will deliver wider sustainability benefits that outweigh the flood risk implications of developing a site.

The Sustainability Appraisal of the Core Strategy DPD (adopted June 2011) identified baseline information regarding key sustainability issues which specifically relate to North Lincolnshire.

Applicants are expected to complete the Sustainability Checklist identified in Appendix 1 by providing justification of how the development proposal meets the Core Strategy DPD Sustainability Appraisal objectives.

The LPA will assess the Sustainability Checklist completed by the applicant and make a decision as to whether the development proposal passes part A of the Exceptions Test.

Residential development of three dwellings or more

To ensure that the development proposal provides a wider sustainable community benefit that outweighs flood risk the council require any planning application for residential development of three or more dwellings to complete a Sustainability Checklist and provide one affordable dwelling.

The applicant will be required to liaise with the council affordable housing officer to check if an RSL agree to the affordable unit to be transferred to their management. If no RSL agrees for the affordable unit to be transferred to their management then the council would require the applicant to provide a financial contribution equivalent to an onsite contribution secured through a section 106. The financial contribution required would be 40% of Land Registry monthly average house price for North Lincolnshire. This currently equates to £41.057.20 (March 2012).

Safe Development

NPPF requires a site specific Flood Risk Assessment (FRA) should accompany all planning applications for development proposals of 1 ha or greater in SFRA Flood Zone 1 and all proposals for new development located in SFRA Flood Zones 2/3a and water compatible proposals in 3(iii).

A FRA should identify and assess the risk of all forms of flooding to and from the development and demonstrate how these flood risk will be managed so that the development remains safe throughout its lifetime taking climate change into account. It must include a comprehensive flood risk management strategy for the site to ensure the development is safe covering:

- The design of any flood defence infrastructure

- Access and egress
- Operation and maintenance
- Design of development to manage and reduce flood risk wherever possible
- Resident awareness
- Flood warning
- Evacuation procedures.

If a proposed development is within an immediate distance from a main river flood bank the Environment Agency will require a hydraulic assessment of the site and surrounding area in relation to the possibility of a flood bank breaching and/or overtopping. For example the Environment Agency advice that a hydraulic assessment is required for proposed development within 500 metres of the River Trent flood banks. The hydraulic assessment will therefore become part of a flood risk assessment and will determine whether safe development on and off-site can be achieved on this particular issue. Developers are advised to liaise with the Environment Agency whether a hydraulic assessment is required, and the issues to be covered.

- Some of the measures that might be considered to help make a development safe are listed below, and can be found in Appendix F of the SFRA. These measures will not all be suitable in all circumstances and the actual mitigation adopted will need to be chosen carefully taking the characteristics of the site, the type of development, the proposed construction materials, the nature of the flood risk and the potential impact on flood risk elsewhere into account.

Possible mitigation measures in SFRA Flood Zones 2/3a are as follows:-

- Raising floor levels - Please refer to the SFRA for guidance.
- Raising ground levels - Ground levels can be raised to provide safe access to and from the site, provided no areas that would form islands during a flood are created as a result. The ground level should be at the Critical Flood Level determined as set out in SFRA Appendix D for the relevant flood compartment or higher.
- Providing flood defences - Flood defences can be provided for individual properties or areas and can consist of embankments, walls, gates or other flood-excluding infrastructure. The defences will need to be sufficiently high to protect against the Critical Flood Levels determined as set out in SFRA Appendix D for the relevant Flood Compartment with at least 300mm freeboard. It may be necessary to provide pumps to keep the protected area dry during the event and the implications of the defences failing or being overtopped should be considered.
- Providing upstairs accommodation or place of safety - The provision of upstairs accommodation or place of safety may be acceptable where living accommodation at ground floor level would be considered dangerous, provided the floor level is at least 300mm above the Critical Flood Levels determined as set out in SFRA Appendix D for the relevant Flood Compartment.
- Using flood resistant construction techniques - Buildings designed and built to keep water out when the surrounding area is flooded are termed ‘flood resistant’. Flood resistant construction techniques include:
    - use of water-proof materials for walls and floors below possible flood level;
    - fitting one-way valves or temporary bungs to sewage pipes and service ducts;
    - providing temporary flood boards (stop logs) for doors, air vents and other features that could allow water to enter the building;
    - providing sumps to collect any water entering the building and pumps (with a greater capacity than the expected inflow) to drain them.

- The structural safety of the building during a flood should be considered (brick walls will not generally resist water depths greater than about 0.6m, sometimes less), as should the need to provide timely warnings so that temporary gates, bungs and flood boards etc can be fitted. Further information can be obtained from the PPS25 Practice Guide and from the publication 'Improving the flood performance of new buildings' (May 2007), which can be downloaded from the Department for Communities and Local Government website at www.planningportal.gov.uk/uploads/br/flood_performance.pdf.
- Using flood resilient construction techniques - Buildings designed and built to minimise the damage caused when flooding occurs are termed 'flood resilient'. Flood resilient construction techniques include:
    - using concrete rather than timber floors;
    - locating boilers and electrical systems (sockets, cabling) above flood levels;
    - using water–resistant materials (plastic, metal) for cupboards and similar items, rather than chipboard or MDF;
    - using lime plaster or cement render rather than gypsum plaster boarding.

Again further information can be obtained from the PPS25 Practice Guide and from the publication 'Improving the flood performance of new buildings' (May 2007), available from the website link given above.

Possible mitigation measures in areas subject to surface water flooding –

- Managing surface water inflows to the site - Diverting water away before it enters the site, storing it on the site or encouraging its rapid transmission through the site are all possible methods of managing surface water inflows. They will form part of the overall drainage strategy for the site, which will need to be developed taking Sustainable Urban Drainage Systems (SUDS) considerations into account (see final bullet point below). The potential impact on flood risk elsewhere will need to be considered.
- Improving the existing drainage network – Improving the existing drainage network may also be a means of mitigating surface water flooding. Again this will form part of the overall drainage strategy for the site, and the potential impact on flood risk elsewhere will need to be considered. SUDS must be considered as a priority within any drainage solution. There are a number of different types of SUDS that can be incorporated into a development. Their effectiveness depends on the topography and geology of the site and the surrounding area, and careful consideration of the site's characteristics is needed to ensure the most suitable choice is made. The most commonly found components are described in SFRA Appendix G.

Step 6 Preparing a Site-specific Flood Risk Assessment

NPPF requires that a site-specific Flood Risk Assessment (FRA) should accompany all planning applications for development proposals of 1 ha or greater in Flood Zone 1 or in areas within this flood zone which has critical drainage problems and all proposals for new development located in SFRA Flood Zones 2/3a and 3b.

The FRA should identify and assess the risks of all forms of flooding to and from the development and show how these risks will be managed, taking climate change into account. For major developments in Flood Zone 1, the FRA should identify opportunities to reduce the probability and consequences of flooding. A FRA will also be required where the proposals (including change of use to a more vulnerable class) may be affected by other sources of flooding or where the Environment Agency, Internal Drainage Board or other bodies have indicated there may be drainage problems.

A site-specific FRA must accompany every planning application, aside from development proposals of less that 1ha in size within flood Zone 1. General guidance on the scope and content of a FRA is given in PPS25 Annex E the NPPF and more detailed guidance can be obtained from the Environment Agency's Standing Advice (see

also the latest locally specific Standing Advice in the latest SFRA). In principle every FRA should be appropriate to the scale and nature of the development and should address both:-

- the risk to the development itself, from whatever cause
- the risk to others due to surface water from the development and development being located within the floodplain.

The FRA will need to show that organisations affected by surface water draining from the development (e.g. the Internal Drainage Board, the Water Company or the Council's Drainage Team) have been consulted on and agree with the proposals.

In carrying out a FRA it is essential for it to be guided by the 2011 Strategic Flood Risk Assessment (SFRA) for North Lincolnshire and North East Lincolnshire (a joint Local Authority document). The SFRA takes into account additional data to that of the EA flood mapping including climate change prediction until 2115, selective breach hazard flood mapping and new more accurate flood modelling, new Lidar (topographical survey data) and the latest history of flood events.

Environment Agency Standing Advice

The Environment Agency (EA) have produced National Standing Advice to local planning officers and developers which simplify the process of deciding planning applications where flood risk issues exist. This advice states that the planning authority can make a decision on an application without consulting the EA where flood risk and vulnerability is sufficiently low. In view of the particular development and flood risk issues in North and North East Lincolnshire, local Standing Advice has been developed and agreed with the Environment Agency. This is set out in the SFRA (paragraphs E33 and E34) and on the council's web site. This replaces the Environment Agency's National Standing Advice and should be used when preparing any planning application that is to be submitted to North or North-East Lincolnshire Planning Authorities.

Applications not complying with these requirements will be refused.

To speed up the application process, pre-application discussions between developers and the Environment Agency (for flood risk issues) and the Council's Drainage Team (for drainage issues) are encouraged. The procedure may be summarised as follows:-

(a) Pre-application

vi. Initial inquiry for information on flood risk issues to the Environment Agency, on drainage issues to the Council's Drainage Team (CDT);

vii. Submission of draft section of FRA covering flood risk or drainage issues to EA or CDT as appropriate;

viii. Comments by EA/CDT (following site visits, meetings if appropriate);

ix. Submission of final section of FRA covering drainage issues to EA/CDT.

(b) Application

x. Submission of planning application with FRA to planning authority;

xi. Planning authority consults with EA/CDT;

xii. EA/CDT considers all relevant issues and responds to planning authority.

The LPA is expected to refuse any applications that do not comply with the locally specific Standing Advice included in the latest SFRA. The Environment Agency confirms it will support such decisions to the full. It should be noted that if a development proposal is satisfactory with regard to flood risk it may still be unacceptable to the Environment Agency with regard to other material considerations.

If the Local Planning Authority is considering granting planning permission contrary to the standing advice, the Environment Agency will be notified of the reasons for doing this and given an opportunity to make further representations.

Appendix 1 Sustainability Checklist

The second column is for the applicant to address the objectives listed in the first column. It may be more appropriate, depending on the case for the applicant, to create separate sheets in order to answer the objectives as the form gives a limited amount of space for answers to be given. Applicants are reminded that in providing justification of how the development proposal meets the Core Strategy DPD Sustainability Appraisal objectives it is not just a tick box exercise but it will require a thorough assessment of the objectives against the proposed development. This is likely to produce positives and negatives in relation to the proposal. The local planning authority will not apply a scoring system to this checklist as it is currently considered an arbitrary approach that may lead to inconsistent decision making, but will hope to achieve a consistent approach to decision making by requiring all applicants to address the same Sustainability Checklist and the local planning authority will assess submissions on each application and monitor submissions and decision making over a period of time. This may or may not lead to new guidance being issued by the local planning authority.

SA Objectives	Comment/ Explanation (Please provide further information explaining how the development proposal meets each of the SA objectives)
Social	
To promote healthier communities	
To tackle poverty, social exclusion and inequality geographically as well as demographically	
To enhance skills, qualifications and the overall employability of the population	
To reduce crime, the fear of crime and to promote safer neighbourhoods	
To improve accessibility to education, employment, recreation, countryside health, community services and cultural facilities for all sectors of the community	
To provide a sufficient and appropriate mix of housing that is affordable, decent and designed to a high standard	
To encourage the participation in culture, leisure and recreational activities including in the countryside	
Environmental	
To minimise the risk of flooding	
To adapt to the impacts of climate change for the built and natural environment	
To make the best use of previously developed land and existing buildings	
To improve air quality	

SA Objectives	Comment/ Explanation (Please provide further information explaining how the development proposal meets each of the SA objectives)
To reduce greenhouse gases emissions particularly from transport	
To protect and enhance biodiversity and important wildlife habitats within and outside designated sites	
To ensure the protection and enhancement of designated sites including Sites of Special Scientific Interest (SSSI) and Special Protection Areas (SPAs)	
To maintain and enhance the quality of countryside and wider countryside and wider landscape	
To reduce congestion, particularly around the South Humber Bank Ports	
To improve public transport provision and promote sustainable modes of transport	
To protect and enhance heritage assets including archaeological sites and monuments, historic landscapes, and local townscapes and their settings.	
To increase energy efficiency and increase the use of renewable energy particularly from wind energy	
To reduce generation of waste, the proportion sent to landfill and to increase recycling	
To protect local water resources, soil quality and quantity	
To promote the use of sustainably sourced products and resources and reusing and recycling products	
To minimise noise and light pollution	
Economic	
To maintain and strengthen the local economy to promote future economic prosperity for North Lincolnshire in rural and urban areas	
To create vibrant towns and village centres in both rural and urban areas	
To increase diversity of employment	
To support and improve the economic activity for rural areas through the retention of local facilities (This SA objective will only apply to any development proposal located within a rural settlement or a rural settlement in the Countryside identified in the adopted Core Strategy Development Plan Document Settlement Hierarchy)	