

Standard Planning Advice

Change of use to a 'more vulnerable' use within an area at risk of flooding

December 2021

Policy position

The proposal represents an increase in the flood risk vulnerability classification (see Table 2 of the Planning Practice Guidance). A change of use which results in a 'more vulnerable' development will only be acceptable if it can be designed to be safe for occupants over the lifetime of development. We are likely to object to a proposal that does not satisfy these requirements.

Sequential and Exception Tests

For simple changes of use the sequential test does not need to be applied. However, where significant works are required to convert the use of a building, or the proposal involves subdivision of an existing residential unit, the sequential test may be applicable. The applicability of the sequential test should be decided by the local planning authority.

If the sequential test is applicable the exception test will need to be applied to 'more vulnerable' development in Flood Zone 3 as well as 'highly vulnerable' development in Flood Zone 2. The exception test requires development to provide wider sustainability benefits to the community and be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

Guidance on both these tests can be found within the Planning Practice Guidance (<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>).

Flood Risk Assessment (FRA)

A site specific FRA is required to this planning application. This is in accordance with paragraph 167 and footnote 55 of the NPPF. The FRA is essential in demonstrating whether the second part of the exception test can be satisfied. It will need to assess the flood risks/hazards, demonstrate whether the development will be safe from flooding over its lifetime, and show how occupants will be able to access/egress the building safely during a flood event. It will also need to demonstrate that the development would not increase flood risks elsewhere and whether it can help to reduce flood risk overall.

Further guidance on what should be included within a site specific FRA can be found within the Planning Practice Guidance as well as on the GOV.UK website <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Climate Change Allowances

In order to demonstrate the risks to the proposal over its lifetime the FRA must also consider the impact of climate change on future flood risks. We have published guidance for planners and developers on how to use climate change allowances within a site-specific FRA. The guidance has been updated to reflect the latest information (e.g. UK Climate Projections 2018) and is available online:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.



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Flood Resilience

In view of the flood risks, we would advise that the applicant gives consideration to the use of flood resilient construction practices and materials in the design and build phase. Choice of materials and simple design modifications can make the development more resistant to flooding in the first place, or limit the damage and reduce rehabilitation time in the event of future inundation. Raising floor levels above the design flood level is most effective at ensuring development will not be subject to internal flooding. Detailed information on flood proofing and mitigation can be found by referring to the MHCLG publication 'Improving the Flood Performance of New Buildings'. The document can be found online:

http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.

Access and egress during a flood event

Paragraph 7-038-20140306 of the Planning Practice Guidance and paragraph 167 of the NPPF are clear that access and egress needs to be part of the consideration of whether new development will be safe. Paragraph Reference ID: 7-039-20140306 provides further guidance.

We advise that a flood plan is prepared which outlines how occupants will respond in a flood event. We have worked with the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) to produce some joint guidance on flood risk emergency plans for new development. The guidance is available online: www.adeptnet.org.uk/floodriskemergencyplan.

Our role is to provide advice to LPAs on the flood hazards at the site and to issue Flood Warnings during a flood event. In considering the safety of access and egress the LPA should also consult with their Council's emergency planners. Where no safe access and egress route exists the LPA will need to consider the hazards and advice from their emergency planners and take a view on whether a safe refuge above the design flood level is a suitable alternative.

Emergency planners will need to confirm that they can incorporate the additional occupants into their emergency evacuation plans.

Further information

You can view the Flood Map for Planning at <https://flood-map-for-planning.service.gov.uk/>.

Field Code Changed

More information can be found within the Flood Risk and Coastal Change pages of the Planning Policy Guidance online:

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.

Flood insurance

It is important that the applicant considers the issue of insurance against flood damages. The [Flood Re](#) scheme is a joint Government and insurance industry initiative to help property owners find affordable insurance in areas at risk of flooding. The scheme only applies to dwellings built before 2009. However, for changes of use to residential, the scheme may be available if there is evidence to demonstrate that the property was built and used as a private residence before 2009.

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