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Flood Risk Scoping Report (Flood Risk Assessment).
Application for prior approval to convert an office (Class E) to
3Nr residential dwellings (Class C3) on land to rear of Elm Tree
Farm, Fords Green, Bacton, Stowmarket, IP14 4HN

On behalf of: Mr and Mrs Wheatley

Prepared by: Andrew Cann B.A. (Hons) APM MCILT

Date: 11/01/2024

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The Furnace, The Maltings, Princes Street,
Ipswich, IP1 1SB

 01473 407911

 enquiries@planningdirect.co.uk


 www.planningdirect.co.uk

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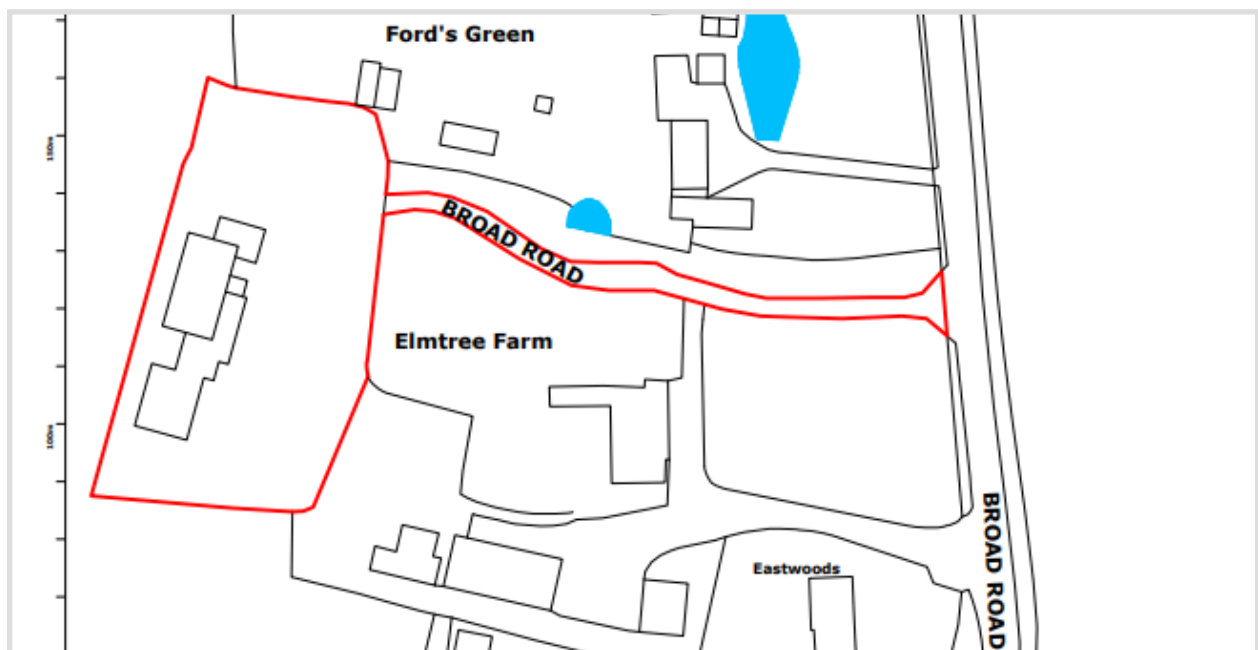


Introduction

Planning Direct has been instructed by Mr and Mrs Wheatly to prepare a Flood Risk Scoping Report) in support of their Prior Approval application. This Flood Risk Scoping Report sets out why this new application does not require a full Flood Risk Assessment Report.

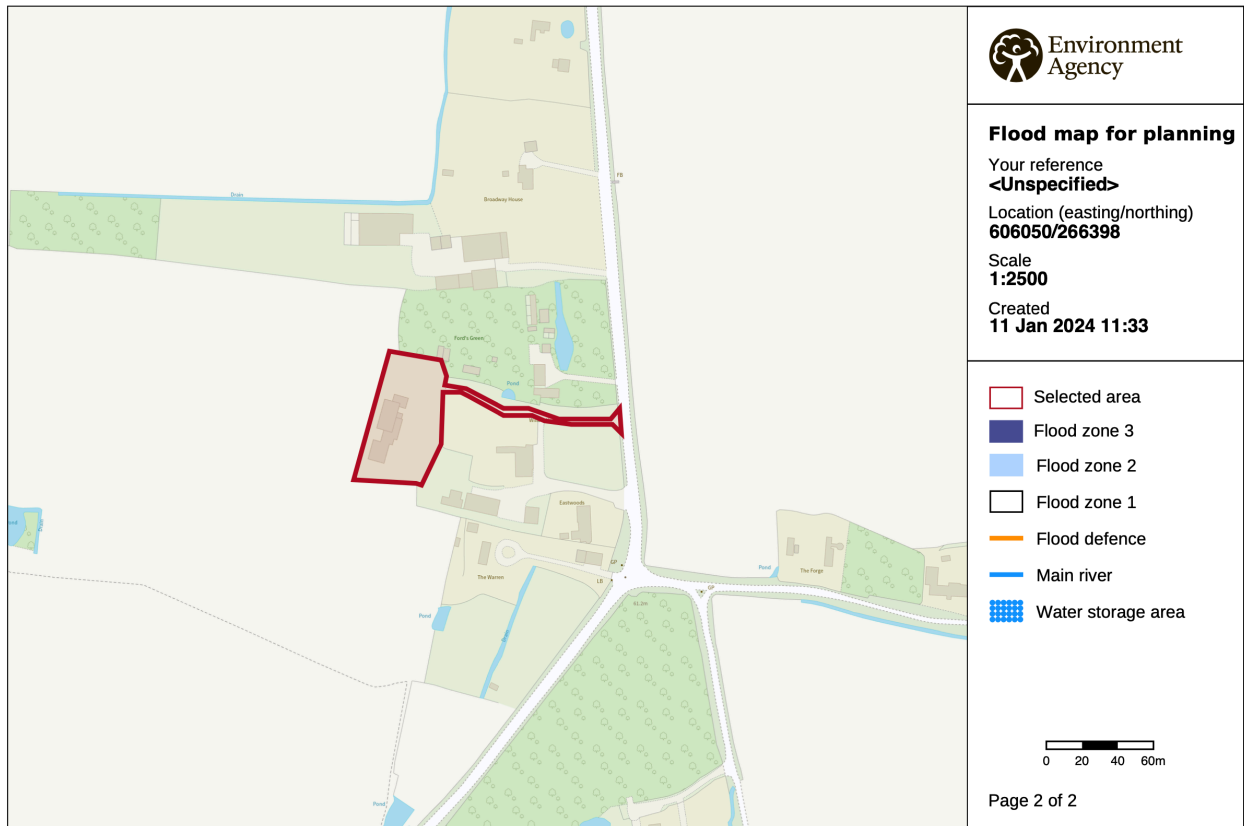
Proposed Development

The Prior Approval application seeks to convert an office building into 3 residential units.



Environment Agency Flood Classification

The site is entirely within Flood Zone 1.



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Relevant Policy

National

National Planning Policy Framework (NPPF)

The NPPF sets out the government's national policies on different aspects of land use planning in England in relation to flood risk.

Paragraph 155 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 159 - If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

Flood Risk Vulnerability¹

The flood risk Technical Guidance defines flood risk as follows:

As set out in the National Planning Policy Framework, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. For these purposes:

- ***“areas at risk of flooding” means land² within Flood Zones 2 and 3; or land within Flood Zone 1 which has critical drainage problems and which has been notified to the***

¹ Taken from the Technical Guidance to the NPPF 2012

² Note the use of the word 'land' and not 'site'.

local planning authority by the Environment Agency;

- “flood risk” means risk from all sources of flooding - including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

Vulnerability

The land is within Flood Zone 1 and does not have any critical drainage problems.

Table 3: Flood risk vulnerability and flood zone ‘compatibility’

Flood risk vulnerability classification (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	✓	✗	✗	✗

Key: ✓ Development is appropriate.
✗ Development should not be permitted.

Notes to table 3:

This table does not show:

- the application of the Sequential Test which guides development to Flood Zone 1 first, then Zone 2, and then Zone 3;
- flood risk assessment requirements; or
- the policy aims for each flood zone.

Conclusion

National policy defines “areas at risk of flooding” meaning land within Flood Zones 2 and 3; or land within Flood Zone 1 which has critical drainage problems and which has been notified to the local planning authority by the Environment Agency;

The development proposed is on land entirely within Flood Zone 1 and does not have critical drainage problems.

A Flood Risk Assessment is thus not required.