**West of England Joint Spatial Plan:**
**Flood risk methodology paper**

The West of England Joint Spatial Plan Issues and Options Consultation was published on 9 November 2015. The consultation explores options for the delivery of at least 85,000 new homes across the West of England area by 2036, including 34 potential strategic locations where additional growth could be delivered. This methodology paper should be read alongside that document. The purpose of this paper is to introduce the approach and context for how flood risk issues will be taken into account in the preparation of the West of England Joint Spatial Plan and summarise the work undertaken to date to support the Joint Spatial Plan.

**National planning policy for flooding**

Paras.100-104 of the National Planning Policy Framework (NPPF) set out a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. Through the application of a sequential test, development is first directed to areas less at risk of flooding. If there are insufficient ‘reasonably available’ sites in areas at low risk of flooding then sites at greater risk can be considered, subject to a site-specific flood risk assessment (and in some cases an additional Exception Test) to show that any development can be made safe for its lifetime.

The Joint Spatial Plan will set out broad locations for future development. Therefore regard must be had to the sequential approach set out in the NPPF and the potential for future site allocations or planning applications in each local authority area to pass the sequential and exception tests.

**Issues and Options: Initial flood risk assessment**

The Issues and Option Consultation does not present a preferred development scenario, therefore a full flood risk report has not been undertaken at this stage. Instead, the flood risk work has sought to establish the baseline position. For each of the 34 potential strategic locations for development set out in the Issues and Options Consultation, the known flood risks have been identified and consideration has been given to the potential implications for development. The key findings of this work are set out in summary form in the Sustainability Appraisal Report.

This initial assessment has been carried out using the best available data. This includes the Environment Agency’s national flood zones, data from each of the West of England authorities’ strategic flood risk assessments and data from additional detailed modelling carried out by the Environment Agency on specific river corridors.

Another strand of the initial assessment work has been to identify locations where further flood risk modelling may be needed if certain strategic locations are taken forward. Typically these are development locations that have not been subject to Level 2 Strategic Flood Risk Assessment, meaning that data on flood risks with climate change is missing or incomplete.
Next steps: Flood risk considerations in the draft Joint Spatial Plan
A wide range of issues will need to be considered in the preparation of the Joint Spatial Plan.

As the Joint Spatial Plan progresses towards the draft plan stage, the 34 potential strategic locations for development will need to be refined. The initial assessment that has been carried out of each strategic location will enable the sequential approach set out in the NPPF to inform this. Where necessary, additional flood risk modelling will be commissioned to support this process as work goes forward to present a preferred spatial strategy.

Flood risk will be considered alongside the full range of planning issues set out in the NPPF. A preferred scenario will be further informed by the outcomes of community involvement, the findings of other studies (e.g. the accompanying transport study and Green Belt assessment) and consideration of viability. Strategic locations that might otherwise be sequentially preferable in flood risk terms may turn out not to be ‘reasonably available’ for the purposes of the sequential test if the consideration of other planning issues meant that they were not readily deliverable or developable.

The draft Joint Spatial Plan will reflect the sequential approach to development in areas at risk of flooding within this wider planning policy context.

Duty to Co-operate and engagement strategy
The flood risk working group has obtained support from the Environment Agency for the assembly of flood data from a ‘patchwork’ of sources at the initial assessment stage. The working group is now liaising with the Environment Agency as a prescribed body on the findings of the initial assessment. Support will be sought for the proposed methodology going forward with a view to continued meaningful dialogue with the Environment Agency as the Joint Spatial Plan develops in accordance with the Duty to Co-operate.

At the Issues and Options stage the key findings of the initial assessment have been reported through the Sustainability Appraisal. The community has the opportunity to comment on detailed flood risk issues as expressed through that process or on the overall approach to flood risk through this paper. It is proposed that the draft Joint Spatial Plan, when published, will be accompanied by a full flood risk report including consideration of the sequential and exception tests.

JSP Flood Risk Working Group - 9 November 2015