

Greater Nottingham Strategic Plan



Flood Risk Assessment April 2024

Greater Nottingham
Planning Partnership



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1. Introduction

Background

- 1.1. The Greater Nottingham Planning Partnership (The Partnership) have undertaken a review of the Strategic Flood Risk Assessment (SFRA) for the Greater Nottingham Area. This area includes the administrative boundaries of: Nottingham City Council, Broxtowe Borough Council, Gedling Borough Council, Rushcliffe Borough Council and Erewash Borough Council.
- 1.2. Currently, the plan area is covered by two SFRAs and an SFRA Addendum:
 - River Leen and Day Brook SFRA (2008) – Black and Veach
 - Greater Nottingham SFRA (2010) – Black and Veach. This document provided updates to the six technical report volumes produced for the 2008 SFRA
 - Greater Nottingham SFRA Addendum (2017) – AECOM. This document refreshed the existing SFRAs.
- 1.3. Following advice provided by the Environment Agency (EA), the Partnership have not commissioned the production of a new SFRA due to a number of hydraulic models within the Greater Nottingham Area pending updates. The Partnership, in agreement with the EA, have undertaken a review of the SFRA which forms part of the evidence base for the Greater Nottingham Strategic Plan.

Aims and Objectives

- 1.4. A review of the SFRA has been compiled to form part of the evidence base of the Greater Nottingham Strategic Plan. Specifically, the report covers:
 - Updates to national policy and guidance relating to flood risk;
 - The Local Plan position for the Greater Nottingham Area;
 - A review of the hydraulic models in the area, the EAs timescales for reviewal, and the impacts on the SFRA; and
 - The new definition for flood zone extents, how this could impact the proposed allocations within the Greater Nottingham Strategic Plan, and advises on the impact on planning applications.

Study Area

- 1.5. Figure 1.1 below illustrates the Greater Nottingham Area and the designated Main Rivers and canals within each administrative boundary.

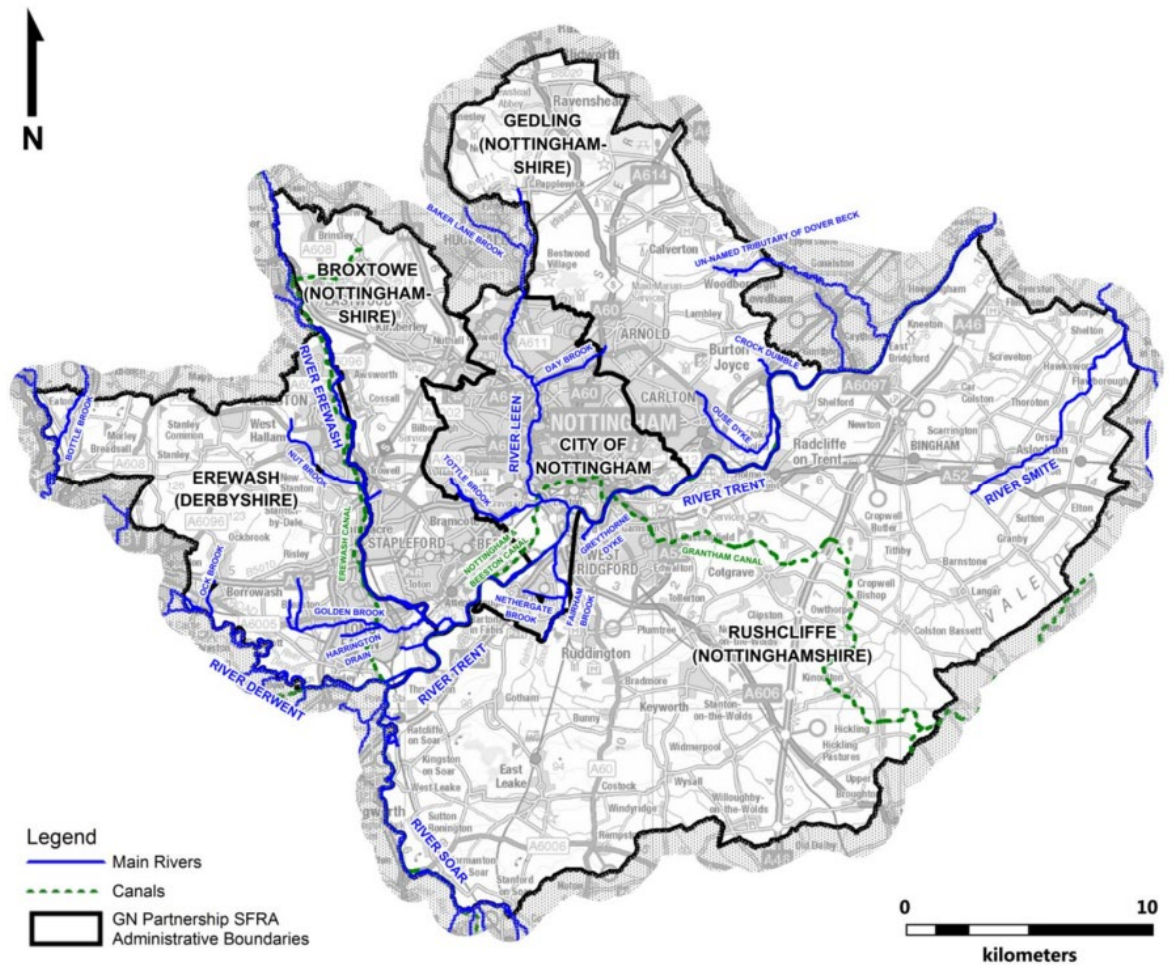


Figure 1.1 Greater Nottingham Area and its Main Rivers and canals

2. National Policy and Guidance

- 2.1. This section should be read in conjunction with the 2008 and 2010 SFRA and the 2017 SFRA Addendum. Various planning policies and guidance documents have been amended, introduced or superseded since the production of the previous reports. This section outlines the key changes at a national scale.

Flood Risk Regulations (2009)

- 2.2. Nottinghamshire County Council and Nottingham City Council, as the Lead Local Flood Authorities in the Greater Nottingham Area, have legal obligations under the EU Floods Directive (2007/60/EC), which was transposed into UK Law through the Flood Risk Regulations to prepare a Preliminary Flood Risk Assessment (PFRA). The PFRA is a high-level screening exercise to identify areas where flood risk is significant (known as Flood Risk Areas). The PFRA requires the preparation and publication of the Preliminary Assessment Report on past and future flooding. The PFRA must include consideration of the consequences of flooding and the review and identification of Flood Risk Areas. The development of the PFRA is also linked to the preparation of the Local Flood Risk Management Strategy required under the Flood and Water Management Act (2010).
- 2.3. Nottingham City Council produced a PFRA in 2011 which concluded that the City of Nottingham was not considered to be a Nationally Significant Flood Risk Area, but Locally Significant Flood Risk Areas were identified. The Assessment concluded that Nottingham City should be considered further in the Local Flood Risk Management Strategies. Consequently, a Flood Risk Management Plan was not required.
- 2.4. Nottinghamshire County Council is currently working on a new PFRA, and a draft Assessment was published in 2023. The assessment does not identify any Flood Risk Areas and concludes that it is not necessary to prepare a Flood Risk Management Plan. The draft Assessment states that local flood risk will be addressed where appropriate within the Local Flood Risk Management Strategy.

National Flood and Coastal Erosion Risk Management Strategy for England (2022)

- 2.5. In accordance with the Flood and Water Management Act (2010), the Environment Agency has a statutory duty to develop a National Strategy for Flood and Coastal Erosion Risk Management. This Strategy provides a framework for the work of all risk management authorities, and sets out the long term delivery objectives that everyone should take over the next 10 to 30 years.
- 2.6. The Strategy has three long-term ambitions:
- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change;

- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change; and
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to take action.

National Planning Policy Framework (2023)

- 2.7. The National Planning Policy Framework (NPPF) was first published in 2012, together with accompanying technical guidance. The NPPF provides a framework which informs the development of locally prepared plans, and is a material consideration when making planning decisions.
- 2.8. Chapter 14 of the NPPF deals with meeting the challenge of climate change, flooding and coastal change. The NPPF requires strategic policies to be informed by a SFRA, manage flood risk from all sources, and consider cumulative impacts in, or affecting, local areas susceptible to flooding. The NPPF requires all plans to apply a sequential, risk based approach to the location of development so as to avoid, where possible, flood risk to people and property.
- 2.9. Paragraph 173 sets out the approach to flood risk when determining planning applications. "Local Planning Authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 - b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - d) any residual risk can be safely managed; and
 - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan."
- 2.10. The NPPF at paragraph 175 requires major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

National Planning Policy Guidance – Flood Risk and Coastal Change (2022)

- 2.11. The technical guidance accompanying the NPPF was replaced by the Planning Practice Guidance in 2014. The Flood Risk and Coastal Change Guidance was first produced in 2014 and updated in 2022 to bring it up to date with the latest policy position. The guidance advises how to take account of and address the risks associated with flooding and coastal change in the planning process.
- 2.12. The flow chart shown below in Figure 2.1 sets out the process Local Plan makers should follow in order to take flood risk into account when preparing strategic policies. During this process, the guidance encourages Local Planning Authorities to seek advice from the early stages of evidence collation through to policy preparation from various different stakeholders including: the EA, the Lead Local Flood Authority and the water and sewerage companies.

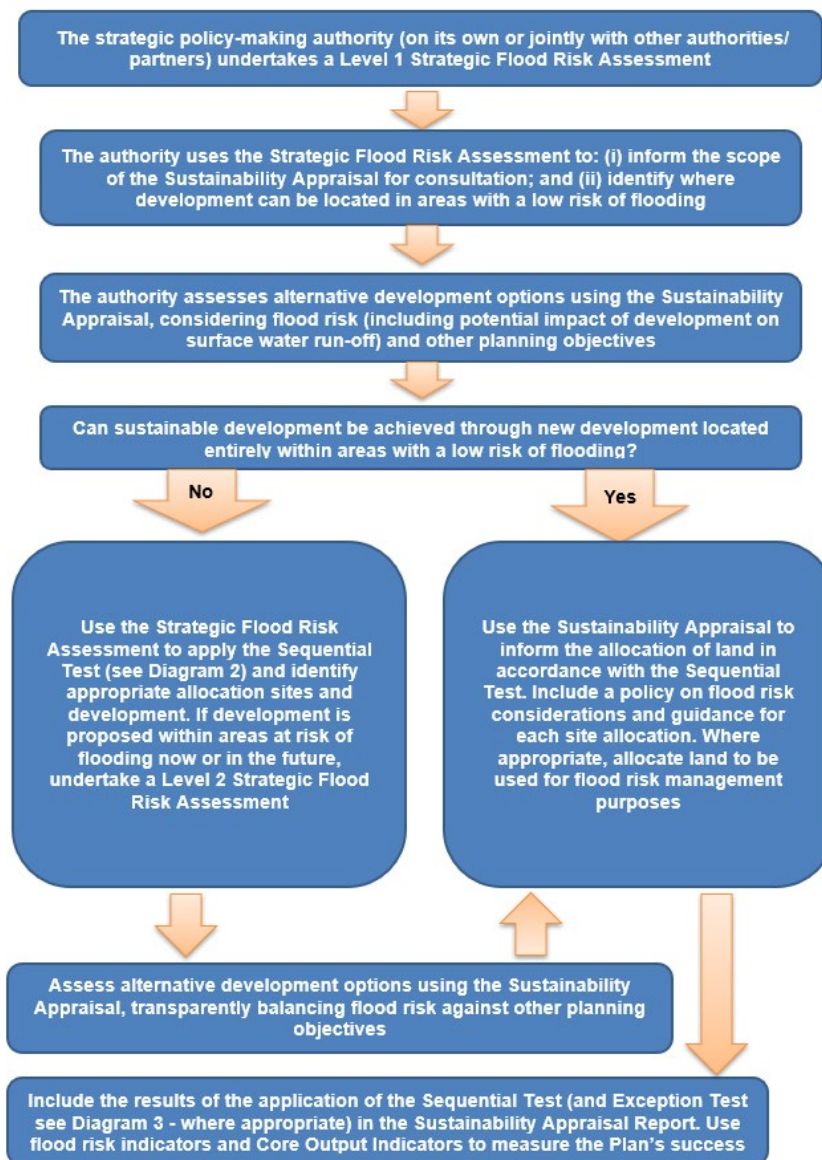


Figure 2.1 Local Plan and flood risk flow chart

- 2.13. Table 1 within the Flood Risk and Coastal Change Planning Practice Guidance provides definitions of the Flood Zones, from low to high probability of river and sea flooding. Of importance is the change in definition to flood zone 3b (the functional floodplain). Previously, the extent of flood zone 3b was defined by the 1 in 20 year event (5% annual exceedance probability). The updated guidance states that flood zone 3b is defined by the 1 in 30 year event (3.3% annual exceedance probability).

Local Flood Risk Management Strategies (2021)

- 2.14. As Lead Local Flood Authorities, Nottingham City Council and Nottinghamshire County Council are required by the Flood and Water Management Act (2010) to produce a Local Flood Risk Management Strategy. The Strategy should be consistent with the National Flood and Coastal Erosion Risk Management Strategy for England, take account of current policy and reflect the aspirations and priorities of other partners with responsibilities for Flood and Coastal Erosion Risk Management along with wider local interests in linked environmental or social outcomes.
- 2.15. In 2021, Nottinghamshire County Council published an updated Local Flood Risk Management Strategy to cover the period 2021-2026. The Strategy has five main objectives:
1. To pursue new solutions, partnerships and alleviation schemes to manage future flood risks and adapt to climate change in Nottinghamshire.
 2. To increase levels of awareness within local organisations and communities by enabling and supporting them so they can become more resilient to flooding and understand their land drainage responsibilities.
 3. To improve delivery of flood risk management by working in partnership across functions and organisations, taking a catchment-based approach.
 4. To integrate local flood risk management into the planning process and support sustainable growth.
 5. To consider the environmental impact of proposed flood risk management measures, maximise opportunities to contribute to the sustainable management of our environment and deliver wider benefits.
- 2.16. In 2015, Nottingham City published their Local Flood Risk Management Strategy. The strategy has seven main objectives:
1. Work collaboratively with Risk Management Authorities and stakeholders to deliver effective maintenance, understand flood risk, jointly invest in schemes and share expertise.
 2. Ensure that new development is sustainable, is not at risk of flooding and does not increase flooding elsewhere. Promote the use of sustainable drainage systems to manage water quality, water quantity and biodiversity improvements.

3. Deliver cost-effective, proportionate and risk-based flood risk management schemes and maintenance activities.
4. Engage with communities and politicians to raise awareness of flood risk, resilience measures, preparedness and riparian responsibilities.
5. Promote flood risk management activities that consider climate change, enhance the natural and historic environment, deliver blue-green infrastructure, improve water quality and provide biodiversity and amenity benefits.
6. Promote a joined-up and catchment-based approach to flood risk management whilst supporting the delivery of improvements to the water environment.
7. Further improve information on flood drainage assets and knowledge of current and future local flooding risk using a risk-based approach.

Flood risk assessments: Climate Change Allowances (2022)

- 2.17. The Environment Agency published climate change allowances in 2016, which have since been updated in 2022. Flood risk assessments should include allowances for climate change in order to increase resilience to flooding and coastal change. The guidance provides allowances for different climate scenarios over different epochs or periods of time.

Peak River Flow Allowances

- 2.18. Peak river flow allowances show the anticipated changes to peak flow by management catchment. The range of allowances is based on percentiles. A percentile describes the proportion of possible scenarios that fall below an allowance level. The:
- central allowance is based on the 50th percentile
 - higher central allowance is based on the 70th percentile
 - upper end allowance is based on the 95th percentile
- 2.19. The Greater Nottingham Strategic Plan Area is predominantly part of the Lower Trent and Erewash Management Catchment. However, a small part of the Borough of Rushcliffe falls within the Soar Management Catchment. Both management catchment allowances are provided below in Table 2.1 and Table 2.2.

Table 2.1 - Lower Trent and Erewash Management Catchment peak river flow allowances

	Total potential change anticipated for the '2020s'	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2080s'
Central Allowance	13%	17%	29%
Higher Central Allowance	18%	23%	39%

	Total potential change anticipated for the '2020s'	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2080s'
Upper End Allowance	29%	38%	62%

Table 2.2 - Soar Management Catchment peak river flow allowances

	Total potential change anticipated for the '2020s'	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2080s'
Central Allowance	14%	16%	28%
Higher Central Allowance	18%	21%	37%
Upper End Allowance	28%	37%	60%

- 2.20. In order to apply the peak river flow allowances in flood risk assessments, the flood risk vulnerability classifications should be used to classify the proposed development. The guidance sets out which allowance should be applied to which vulnerability classification, as shown in Table 2.3 below.

Table 2.3 - Flood risk vulnerability classifications and allowances

	Water Compatible	Less Vulnerable	More Vulnerable	Highly Vulnerable	Essential Infrastructure
Flood Zone 2	CA	CA	CA	CA	HCA
Flood Zone 3a	CA	CA	CA	X	HCA
Flood Zone 3b	CA	X	X	X	HCA
CA = Central Allowance; HCA = Higher Central Allowance; X = Development not permitted					

- 2.21. The guidance advises that the peak river flow allowances should be applied to developments and allocations where the SFRA shows an increased risk of flooding in the future. The guidance confirms that where it is appropriate to apply a credible maximum scenario – for example in the case of new settlements or significant urban extensions where you may also need to assess the flood risk from a high impact climate change scenario – the upper end allowance should be used.

Peak Rainfall Intensity Allowance

- 2.22. The peak rainfall allowances show anticipated changes in peak rainfall intensity. Increased rainfall affects surface water flood risk and the design of drainage systems.

- 2.23. The Greater Nottingham Strategic Plan Area is predominantly part of the Lower Trent and Erewash Management Catchment. However, a small part of the Borough of Rushcliffe falls within the Soar Management Catchment. Both management catchment allowances are provided below in Table 2.4 and Table 2.5.

Table 2.4 - Lower Trent and Erewash Management Catchment peak rainfall allowances

3.3% annual exceedance rainfall event		
	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2070s'
Central Allowance	20%	25%
Upper End Allowance	35%	35%
1% annual exceedance rainfall event		
	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2070s'
Central Allowance	20%	25%
Upper End Allowance	40%	40%
*Use '2050s' central allowances for development with a lifetime up to 2060 and use the '2070s' central allowances for development with a lifetime between 2061 and 2100.		

Table 2.5 - Soar Management Catchment peak rainfall allowances

3.3% annual exceedance rainfall event		
	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2070s'
Central Allowance	20%	25%
Upper End Allowance	35%	35%
1% annual exceedance rainfall event		
	Total potential change anticipated for the '2050s'	Total potential change anticipated for the '2070s'
Central Allowance	20%	25%
Upper End Allowance	40%	40%
*Use '2050s' central allowances for development with a lifetime up to 2060 and use the '2070s' central allowances for development with a lifetime between 2061 and 2100.		

- 2.24. The guidance states that the development lifetime guidance should be used to work out the lifetime of a development. For developments with a lifetime beyond 2100, which includes development proposed in applications or local plan allocations, flood risk assessments and SFRAs should assess the upper end allowances for both the 1% and 3.3% annual exceedance probability events for the 2070s.

3. Local Planning Policy

- 3.1. The members of the Greater Nottingham Planning Partnership have historically worked together on planning policy matters in the Greater Nottingham Area. The Partnership includes the Councils of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe together with the Hucknall part of Ashfield District, and the two associated County Councils of Derbyshire and Nottinghamshire.

Adopted Local Plans

- 3.2. The Councils of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe agreed in 2009 to work together to produce Aligned Core Strategies, with the aim to ensure that the policies of the proposed Aligned Core Strategies were consistent across Greater Nottingham.
- 3.3. During the production of the Aligned Core Strategies, Erewash and Rushcliffe departed from the joint work on the Strategies and opted to produce individual Core Strategies. However, they utilised some of the joint evidence base commissioned by the Partnership. All five Councils used the 2008 and 2010 SFRAs as part of their evidence base for their Core Strategies.
- 3.4. The following Local Plan Core Strategies have been adopted in the Greater Nottingham Area:
- Broxtowe Borough, Gedling Borough, Nottingham City Aligned Core Strategies Part 1 Local Plan (September 2014)
 - Rushcliffe Local Plan Part 1: Core Strategy (December 2014)
 - Erewash Core Strategy (March 2014)
- 3.5. Broxtowe, Gedling, Nottingham City and Rushcliffe opted to progress with Part 2 Local Plans. The Part 2 Local Plans were prepared individually and set out the Councils' non-strategic development allocations and detailed policies for managing new development, following on from the strategic framework set out in the Core Strategies.
- 3.6. The four Councils and Erewash commissioned an Addendum to the SFRA. The 2017 Greater Nottingham SFRA Addendum supported the Part 2 Local Plans as it refreshed the guidance provided within the 2008 and 2010 SFRAs to accord with the latest flood risk policy, guidance and data availability.
- 3.7. The following Part 2 Local Plans have been adopted by the Partnership:
- Broxtowe Part 2 Local Plan 2018-2028 (October 2019)
 - Gedling Local Planning Document Part 2 Local Plan (July 2018)
 - Nottingham City Land and Planning Policies Local Plan Part 2 (January 2020)
 - Rushcliffe Local Plan Part 2: Land and Planning Policies (October 2019)

Greater Nottingham Strategic Plan

- 3.8. The Councils of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe agreed to work on a joint Strategic Plan. However, prior to a draft version of the Strategic Plan being consulted, Erewash departed from the joint work to undertake an individual Core Strategy Review. Broxtowe, Gedling, Nottingham City and Rushcliffe continued to work together on the Strategic Plan.
- 3.9. Broxtowe, Gedling, Nottingham City and Rushcliffe have previously consulted on the Greater Nottingham Strategic Plan Growth Options document in July 2020 and February 2021, the Greater Nottingham Strategic Plan Preferred Approach in January/February 2023, and more recently on the Greater Nottingham Strategic Plan: Distribution and Logistics Preferred Approach in September-November 2023.
- 3.10. The Councils have now prepared the Greater Nottingham Strategic Plan Publication Version. The Publication Version details the proposed policies for the area and includes strategic site allocations for the four Councils which will help meet their housing and employment needs. All four Councils are carrying forward strategic housing allocations from their adopted Core Strategies plus the Chetwynd Barracks allocation in Broxtowe, with planning permission already secured on a majority of the sites. The Strategic Plan is also proposing an extension to the Top Wighay Farm site in Gedling of 710 dwellings. To fulfil the housing need, further dwellings will be delivered via allocations within new subsequent Local Plans which are to be prepared by the individual Local Authorities, or through windfall sites.
- 3.11. In addition to the strategic housing sites, two new strategic employment sites are proposed to be allocated: one on the site of the Ratcliffe on Soar Power Station and land to the south of the A453, and the other on the site of the former Bennerley Coal Disposal Area.
- 3.12. The Councils have undertaken this review of the SFRA to determine whether the existing SFRAs and the SFRA Addendum are up to date and to consider whether the strategic allocations proposed with the Strategic Plan would necessitate an updated SFRA. Following advice received from the EA, the Councils have not commissioned the production of a new SFRA due to a number of hydraulic models within the Greater Nottingham Area pending updates. As indicated by the EA, a new SFRA should be commissioned when all the hydraulic models have been updated and are available for use. In the interim, the Councils have produced this document to review any changes to flood risk guidance and to assess how this could impact the Strategic Plan and its proposed strategic allocations.
- 3.13. As detailed above, the Publication Version of the Strategic Plan proposes two new strategic employment allocations. The strategic housing allocations are carried forward from the Councils' adopted Core Strategies, with the addition of an extension to Gedling's allocation at Top Wighay Farm. Planning permission has been granted on a majority of the allocations. It is therefore expected that the changes to the flood risk guidance will not impact the proposed site allocations. Regardless, Chapter 4 of this

update assesses the impact of the changes to the strategic allocations and confirms if further discussions are required with the EA. Chapter 5 provides the conclusions of the assessment and offers suggestions where necessary.

4. Flood Risk Updates

- 4.1. The Partnership have been in consultation with the Environment Agency (EA) and colleagues within Nottingham City and Nottingham County Council (the Lead Local Flood Authorities) to discuss the SFRA, updates to flood risk guidance, and the impact to the Greater Nottingham Strategic Plan and its proposed strategic allocations. The EA raised two main issues which are discussed below.

Fluvial Hydraulic Model Updates

- 4.2. The Partnership engaged with the EA in 2023 to determine whether the existing 2008 and 2010 SFRA and the 2017 SFRA Addendum would be sufficient to form part of the Strategic Plan's evidence base, or if the EA would require the production of a new SFRA.
- 4.3. The EA stated that they had a number of hydraulic models currently due for release during 2023 and 2024 and advised that the commissioning of a new SFRA would be better placed once the updated hydraulic model data is officially published. In the interim, the EA confirmed that the current 2008 and 2010 SFRAs and the 2017 SFRA Addendum are sufficient and can support the Strategic Plan (see Appendix A).
- 4.4. The EA confirmed in 2023 that the following hydraulic models were being updated as part of a programme of flood model updates across the Greater Nottingham Area:
- River Leen, Arup, 2022 - released in 2023
 - Greater Nottingham Tributaries, 2020 – Ouse Dyke, Fairham and Nethergate Brooks, Greythorne Dyke, Tottle Brook
 - Erewash and Tributaries 2023 Aecom (due 2025) Erewash, Nut Brook, Bailey Brook, Golden Brook. Goldren Stream, Boundary Brook – completed.
 - Derbyshire Trent 2021
 - Dover Beck and Woodborough Brook – was due in 2023 but no longer in preparation.
 - Trent from M1 to Newark – next few years (requires survey update so significant piece of work)
- 4.5. Subsequently, the Partnership have followed the advice received from the EA and opted to wait for the various hydraulic models to be updated before commissioning a new SFRA. As confirmed by the EA, the existing 2008 and 2010 SFRA and the 2017 SFRA Addendum are sufficient to inform the policies of the Strategic Plan and can form part of its evidence base. However, the Partnership have additionally undertaken this SFRA review to confirm the validity of the existing SFRAs, and to review changes to national flood risk guidance and policy.
- 4.6. Nottinghamshire County Council and Nottingham City Council as Lead Local Flood Authorities have been consulted with regards to this approach and have also confirmed their approval.

Update to Flood Zone 3b extent

- 4.7. As stated at paragraph 2.13, the Flood Risk and Coastal Change Planning Practice Guidance was updated in 2022. Of particular importance was the change in definition to flood zone 3b (the functional floodplain). The existing SFRAs determine the outline of flood zone 3b utilising the 1 in 20 year event (5% annual exceedance probability). The outline of flood zone 3b is now determined by the 1 in 30 year event (3.3% annual exceedance probability). In practical terms this means the new extent of flood zone 3b is larger than previously understood.
- 4.8. Whilst the EA confirmed the change to the flood zone 3b extent, they unfortunately could not provide a comprehensive dataset of the 1 in 30 year flood outline for all of Greater Nottingham in order for the Partnership to use to update its SFRA flood maps. The EA provided a list of all the river models in the Greater Nottingham Area, where they have modelled the 1 in 30 year outline, and the date when an update to the model to include the 1 in 30 year flood outline is anticipated. This list can be viewed at Appendix B.
- 4.9. The EA advised that going forward, as the various models are updated, they will include the 1 in 30 year event, so a full dataset will become available. The EA also advised that a national project is underway which will undertake flood risk modelling for the whole of England, which will include a 1 in 30 year defended and undefended outline. This data will be available to use as a basis for the new flood zone 3b extent. The EA anticipate this project being completed and the data released in Summer 2024.
- 4.10. The Partnership therefore does not have access to a complete dataset illustrating the new flood zone 3b outlines. To understand whether the updated flood zone 3b outline would impact the proposed strategic allocations, the EA suggested that where the Partnership suspects an impact to an allocation, the Partnership should consult the EA on that specific allocation for further guidance. The EA did not have the capacity to review all the strategic allocations proposed by the Partnership.
- 4.11. For planning applications, the EA has provided similar advice. Where an applicant or the Local Planning Authority suspects that a site could be impacted by the change to the 1 in 30 year outline, it is recommended to consult the EA. If the EA does not have a 1 in 30 year flood outline modelled for the watercourse in question, the applicant may have to undertake hydraulic modelling themselves to calculate the extent of the 1 in 30 year event, depending on the scale and vulnerability of the development. The EA emphasises that any application deemed to fall within flood zone 3b will not be supported unless it is deemed essential infrastructure or water compatible.
- 4.12. The Partnership have reviewed the proposed strategic allocations individually and have concluded that, with the exception of the Toton and Bennerley strategic allocations, they do not need to consult the EA on any of the allocations. Table 4.1 below shows the analysis.

Table 4.1 - Analysis of proposed site allocations

Site to be allocated	Analysis	Consult EA?
Field Farm, Broxtowe	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Toton Strategic Location for Growth, Broxtowe	Western edge partially in flood zone 3.	Yes
Chetwynd Barracks, Broxtowe	The entire site is in flood zone 1.	No
Boots, Broxtowe/ Nottingham City	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Teal Close, Gedling	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Gedling Colliery/Chase Farm, Gedling	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Top Wighay Farm, Gedling (including the extension)	The existing site currently has planning permission so the EA have been engaged with, and flood risk matters resolved. The extension is located in flood zone 1.	No
North of Papplewick Lane, Gedling	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Broad Marsh, Nottingham City	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Stanton Tip, Nottingham City	The entire site is in flood zone 1.	No
Melton Road, Edwalton, Rushcliffe	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
North of Bingham, Rushcliffe	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Former RAF Newton, Rushcliffe	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No
Former Cotgrave Colliery, Rushcliffe	The development has been completed.	No
South of Clifton, Rushcliffe	The site currently has planning permission so the EA have been engaged with, and flood risk matters resolved.	No

Site to be allocated	Analysis	Consult EA?
East of Gamston/North of Tollerton, Rushcliffe	The EA is being engaged with through an outline application.	No
Ratcliffe on Soar Power Station, Rushcliffe	The entire site is in flood zone 1 and the EA have engaged through the Local Development Order.	No
Former Bennerley Coal Disposal Area, Broxtowe	Site is within flood zone 3.	Yes

- 4.13. The Partnership have consulted the EA on the Toton and Bennerley strategic allocations and have received feedback which can be viewed in Appendix C. In summary, the EA have advised that for Toton, which is affected by the River Erewash, the new Erewash model is due in 2025, so the flood zone extents at the site are likely to change in the short term. However, the majority of the site which would be developed within the plan period lies at a higher level and is outside of the flood zone extents. For Bennerley, the site is affected by the River Erewash main river and the Gilt Brook ordinary watercourse. The new Erewash model is due in 2025, however it does not include the Gilt Brook. The national project to be undertaken by the EA, which is due Summer 2024, is expected to provide a specific flood zone 3b outline for all watercourses including ordinary watercourses. Therefore, the flood zone extents at the site are likely to change in the medium term.
- 4.14. Nottinghamshire County Council and Nottingham City Council as Lead Local Flood Authorities have been consulted on the proposed site allocations and have not raised concerns. Their comments can be viewed in Appendix D.

5. Conclusions

- 5.1. In summary, this review has sought to explain the Partnership's reasoning for not producing a new SFRA, and to provide an update on any changes to national flood risk guidance and policy and the subsequent impacts to the Greater Nottingham Strategic Plan.
- 5.2. As confirmed in Chapter 4, the Partnership have not commissioned the production of a new SFRA due to a number of hydraulic models within the Greater Nottingham Area pending updates, as per advice received from the EA. The Partnership, in agreement with the EA, have instead produced this review of the SFRA which forms part of the evidence base for the Greater Nottingham Strategic Plan. The Partnership will look to produce a new SFRA when the updated hydraulic modelling is released. The EA and the Lead Local Flood Authorities have confirmed their approval of this approach.
- 5.3. As discussed in Chapter 2, a number of national guidance and policies have changed since the 2017 SFRA Addendum. Of particular importance is the change to the definition of flood zone 3b within the Planning Practice Guidance to the 1 in 30 year event (3.3% annual exceedance probability).
- 5.4. Whilst the extent of flood zone 3b has increased following this change, the Partnership have assessed the proposed strategic allocations within the Publication Version of the Strategic Plan and have concluded that the change will not impact the majority of the proposed strategic allocations.
- 5.5. The Partnership consulted the EA and the Lead Local Flood Authorities with regards to the proposed strategic housing allocation at Toton and the proposed strategic employment allocation at Bennerley, which will both be impacted by the changes to the flood zone 3b extents. The Lead Local Flood Authorities have raised no concerns with the proposed allocations. The EA advised that the flood zone 3b extents will change in the short term at Toton and in the medium term at Bennerley.
- 5.6. With regards to planning applications, the EA have advised that where an LPA or an applicant suspects that a site is impacted by the change to the flood zone 3b extent, they should consult the EA for further advice.

Appendix A: Advice received from the EA on an SFRA update

From: [REDACTED]
Subject: RE: GN Strategic Plan - SFRA
Date: 14 March 2023 12:28:45

You don't often get email from [REDACTED]

Warning: This email is from an external sender and has an attachment or link to the internet, please use caution.

Thank you Paul, I agree with the paragraph. We have the following new models newly published or in progress:

- River Leen, Arup, 2022 (currently finalising, not released yet)
- Greater Nottingham Tribs, 2020 – Ouse Dyke, Fairham and Nethergate Brooks, Greythorne Dyke, Tottle Brook
- Erewash and Tribs 2023 Aecom (currently in progress, due summer 2023) Erewash, Nut Brook, Bailey Brook, Golden Brook. Goldren Stream, Boundary Brook).
- Derbyshire Trent 2021
- Dover Beck and Woodborough Brook – due 2023
- Trent from M1 to Newark – next few years (requires survey update so significant piece of work)

I am available for a meeting the week commencing 27th March (ideally Monday or Tuesday) , the following two weeks (w/c April 3rd and w/c April 10th) I will be out of the office.

Thank you

Sarah

Sarah Street

Flood Risk Management Advisor

East Midlands Partnership and Strategic Overview Team, Nottinghamshire & Tidal Trent

[REDACTED]
Environment Agency, Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5BR

From: Goldsmith, Paul [REDACTED]
Sent: 14 March 2023 11:22
To: John King (Policy and Planning) [REDACTED]
Cc: Matt Gregory [REDACTED] Richard Mapletoft
[REDACTED] Chloe Langley [REDACTED] Street,
Sarah [REDACTED]
Subject: RE: GN Strategic Plan - SFRA

Hello John,

I actually emailed back to our flood risk team for further clarity yesterday and I'm just waiting for a response. However they asked whether the SFRA specifically required any updates right now or if this could be updated at a later date?

The reason they asked was that we have a number of updated models due for release throughout this year and next which could impact the SFRA. Our national team have stated that any updates to an SFRA should look to include the updated 1 in 30 year FZ3b designation extents. However as previously discussed our models do not include these outlines so would require some modelling work to be undertaken by the LPA.

We are of the opinion that the current SFRA can still serves its purpose at present and it may be a case of producing a statement along the lines of the following.

We have been made aware by the Environment Agency of impending updates to a number of hydraulic models and as such we have decided that the authority would be better served waiting for the official publication of this data before updating the SFRA. We have also been informed of a recent update to the guidance relating to the designation of flood zone 3b (functional floodplain). The extent of flooding used to determine the outline of FZ3b, currently the 1 in 20 year event has been changed to the 1 in 30 year event. While the frequency of this flooding is now reduced the extent of flooding will increase. Therefore applications within or close to the current FZ3b outline may need to be accompanied by hydraulic modelling to determine whether they fall within the above mentioned extent. Please note that any application deemed to fall within FZ3b will not be supported unless it is deemed essential infrastructure or water compatible.

You can probably word this differently to suit but it may be a starting point. I wonder what you think?

I have copied in my colleague Sarah Street from the flood risk team as she may have further information to add. We will be happy to have a meeting with you if you wish to discuss this in person however I am on annual leave from tomorrow returning to the office on Thursday 23rd March 2023.

Many thanks

Paul

Paul Goldsmith
Planning Specialist
Sustainable Places Team
East Midlands Area

Environment Agency, Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5FA

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From: John King (Policy and Planning) [REDACTED]
Sent: 14 March 2023 10:11
To: Goldsmith, Paul [REDACTED]
Cc: Matt Gregory [REDACTED] Richard Mapletoft
[REDACTED] Chloe Langley [REDACTED]
Subject: RE: GN Strategic Plan - SFRA

Hi Paul,

Have you had time to discuss the implications of updated modelling for the River Leen and the changes to FZ3b upon the SFRA.

We would be happy to meet you and your colleagues to discuss these issues.

Regards

John

From: Goldsmith, Paul [REDACTED]
Sent: 14 February 2023 10:55
To: John King (Policy and Planning) [REDACTED]
Subject: RE: GN Strategic Plan - SA Hello John,

Warning: This email is from an external sender and has an attachment or link to the internet, please use caution.

Hi John,

I have submitted comments to the main email inbox on the SA just now.

There isn't a huge amount I have chosen to highlight as our previous comments on the preferred options and SA objectives is still relevant and assume that these will be considered when reviewing the final SA. I did supply some extra comments regarding preferred site allocations which you confirmed you had received.

Hopefully we can work together prior to the submission of the final draft SA as discussed so that we can avoid any issues.

With regard to the SFRA I am waiting for a further discussion with the flood risk officer who is currently on annual leave until Monday 20th February. Once I speak with her I will report back BUT I want to make you aware that the initial indication is that the SFRA is likely to need an update as new modelling has been undertaken for the River Leen. Regarding FZ3b I am still discussing a way forward on this so I apologise for the slow response. Are you working to a tight deadline on this and what impact could a required update have on the plan progress?

Many thanks

Paul

Paul Goldsmith
Planning Specialist
Sustainable Places Team
East Midlands Area

Environment Agency, Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5FA

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From: John King (Policy and Planning) [REDACTED]
Sent: 30 January 2023 10:57
To: Goldsmith, Paul [REDACTED]
Cc: Ian McDonald [REDACTED] Matt Gregory
[REDACTED]
Subject: GN Strategic Plan - SA

You don't often get email from [REDACTED]

Hi Paul,

Further to my email earlier, you stated in your email to Matt G that you had submitted comments on the SA alongside comments on sites. I have just reviewed your representation (sent on the 24 Jan) and there were no comments on the SA. I presume this is a typo and, given your query you are/will be submitting them separately.

Like you I am picking up this work (having taken over the post from Mark Thompson) and I therefore appreciate that it's a little difficult pinning down where we are with the SA, given the lengths of time and additional Regulation 18 consultation on the Preferred Approach.

From what I gather, we consulted the EA (alongside the other Environmental bodies) on the draft scoping report back in 2019 (twice) and these comments were taken into consideration in the scoping report that accompanied the growth options consultations in 2020/21. I don't think we received comments from the EA on the SA during these official public consultations. I assume the EA was satisfied that their comments had been addressed.

Prior to the current Preferred Approach consultation, we sought informal comments on the policy options, which I assume are Joe's comments you refer to in your email to Matt.


As the preferred approach does not contain these policies (we had to focus on development targets, distribution and strategic sites at this stage), they will form part of the next Regulation

19 consultation. Consequently, the SA of the current Preferred Approach doesn't include an assessment of policy options, or reference to the EAs (Joe's) informal comments on them. When we publish the final SA, it will address the EA's comments on the policy options and these will be set out in Appendix C.

We did not have time to consult the EA (or others) informally on the Preferred Approach sites or other options as we did not have time. I would advise that the EA review the PA SA (which covers the strategic approach to housing and employment, including strategic allocations) being mindful that informal comments on policy options have already been submitted. Whilst there will of course be an opportunity to provide further advice at Regulation 19, we would very much want to avoid any issues that could threaten the plan's soundness. Therefore further discussions between us (and potential sharing of draft policies and SA assessments) would be beneficial. As mentioned you are welcome to attend a GN Officers meeting or separate meeting with the SA working group.

Regards

John

John King MRTPI
Conurbation Planning Policy Manager


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Appendix B: Position of river models in the Greater Nottingham Area

River	Local Authority	30 year outline available	Model delivered	On model programme	Comments
River Soar	Rushcliffe	No	2012	Yes - 25-26	
River Trent	Rushcliffe, Broxtowe, Erewash and Nottingham City	No	2010	Yes - 24-25	
Fairham Brook	Nottingham City	Yes	2020		
Nethergate Brook	Nottingham City	Yes	2020		
Greythorne Dyke	Rushcliffe	Yes	2020		
River Smite	Rushcliffe	No	2012	Yes - 26-27	
River Derwent	Erewash	No	2011	Yes - 23-24	
Ock Brook	Erewash	No	2013		
New Sawley Brook	Erewash	Yes	2020		
Golden Brook	Erewash	No	2013		Current project delivered summer 2023
Golden Stream	Erewash	No	2013		Current project delivered summer 2023
River Erewash	Erewash, Ashfield and Broxtowe	No	2013		Current project due to be delivered 2025
Nut Brook	Erewash	No	2013		Current project delivered summer 2023
Bottle Brook	Erewash	No	2012	Yes - 23-24	
Boundary Brook	Broxtowe	No	2013	Yes - 23-24	
Tottle Brook	Nottingham City	Yes	2020		
River Leen	Nottingham City, Ashfield and Gedling	Yes	2023		Recently delivered, not processed
Day Brook	Nottingham City and Gedling	Yes	2023		Recently delivered, not processed
Ouse Dyke	Gedling	Yes	2020		
Crock Dumble	Gedling	No	2014		
Dover Beck	Gedling	No	2014	Possible for 23-24	
Woodborough Brook	Gedling	No	2014	Possible for 23-24	
Baker Lane Brook	Ashfield	No	2009		

Appendix C: EA response to the strategic allocations at Toton and Bennerley

From:



Subject:

RE: Greater Nottingham SFRA Review

Date:

30 September 2023 13:22:06

Attachments:

[Toton and Chilwell Neighbourhood Plan.docx](#)
[Chetwynd and Toton Draft NP response.rtf](#)

Hello John and Katie,

Further to our recent meeting I thought I'd send on Sarah's comments from a flood risk perspective. I have also added some more general comments relating to the other environmental elements you may wish to consider.

Sarah's comments on SFRA and Toton and Bennerley sites

I've read through the whole of the "Review of the Greater Nottingham Strategic Flood Risk Assessment" and it follows exactly what we agreed with the council representatives at the GNSFRA meetings. I understand that the GNSFRA and 2017 Addendum will remain in force – this is important as we rely on the Addendum to apply the policies regarding flood risk mitigation and floor levels. Once we have new hydraulic model data for the watercourses discussed, we recommend that the GNSFRA group work on a new SFRA in collaboration with the Environment Agency. We have provided comments on this previously for example regarding the need to make space for floodwater around the River Leen.

Bennerley Site allocation – Areas of this site will be affected by the 1 in 30 year flood outline (flood zone 3b/functional floodplain). The site is affected by the River Erewash main river and also the Gilt Brook Ordinary Watercourse. The new River Erewash model is due this Autumn, however I don't believe it includes the Gilt Brook. The NAFRA2 project which is due next summer is expected to provide a specific flood zone 3b outline for all watercourses including Ordinary Watercourses as well as an updated flood zone 2 and flood zone 3a. At this stage the flood zones at this site are therefore likely to change in the medium term.

Toton Site allocation – Areas of this site will be affected by the 1 in 30 year flood outline (flood zone 3b/functional floodplain). The site is affected by the River Erewash main river. The new River Erewash model is due this Autumn. At this stage the flood zones at this site are therefore likely to change in the short term.

My general planning comments on allocated sites

Bennerley site allocation - The Bennerley site is likely to have significant land contamination given the historic uses on site. The south western portion of the redline boundary is the site of the former Bennerley Ironworks and a coal dump. We would recommend early engagement with the EA regarding potential Groundwater & Contaminated Land issues which may arise at this site.

Toton site allocation – I have attached my comments for the Toton and Chetwynd neighbourhood Plan and plan revisions which may help.

I hope this helps.

Many thanks

Paul

Paul Goldsmith
Planning Specialist
Sustainable Places Team
East Midlands Area


Environment Agency, Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5FA


[REDACTED]

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From: Localdevelopment [REDACTED]
Sent: 21 July 2023 10:07
To: Planning, Lower Trent [REDACTED]
Cc: John King (Policy and Planning) [REDACTED]
Subject: Greater Nottingham SFRA Review

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Hi team,

Please see attached a review of the Greater Nottingham SFRA. It confirms the position of the SFRA and reviews the impact of the change to flood zone 3b on the Strategic Plan's proposed allocations. We have reviewed all our proposed allocations in light of the change to flood zone 3b and believe only Toton (housing allocation) and Bennerley (employment allocation) will be affected. I've attached a site location plan for both. Please could you assess and provide any feedback on the sites and the document.

We'd appreciate it if we could have comments back by the end of August. Happy to arrange a meeting to discuss if you feel that would be more beneficial.

Please treat all information received as confidential.

Kind regards,

Katie

Katie Hancock
Planning Policy Officer

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Appendix D: Lead Local Flood Authorities responses to the strategic allocations at Toton and Bennerley

From: [REDACTED]
Subject: RE: Greater Nottingham SFRA Review
Date: 31 August 2023 09:36:54
Attachments: [image001.png](#)
[image002.png](#)

Good morning,

I have reviewed the draft SFRA and I am happy with the contents.

The only comment I have for discussion is around the Stanton Tip site which may need EA consultation (but this sits outside of the SFRA review as this will be more from a contaminated land perspective).

I am on leave on the 20th for the meeting to discuss further; however I have forwarded the invite to my team members to attend.

Kind regards,

Chloe Langley (*she/her*)
Flood Risk Management
Principal Officer – Strategy & Policy
0115 8765 035

**Traffic & Flood Risk Management | Planning & Transport | Growth & City Development |
Nottingham City Council | Loxley House | Station Street | Nottingham | NG2 3NG**



Talk to us on [Twitter](#), [Facebook](#) or via transportnottingham.com

From: Localdevelopment [REDACTED]
Sent: 21 July 2023 10:07
To: FloodRiskManagement [REDACTED]
Cc: John King (Policy and Planning) [REDACTED]
Subject: Greater Nottingham SFRA Review

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Hello,

Please see attached a review of the Greater Nottingham SFRA. It confirms the position of the SFRA and reviews the impact of the change to flood zone 3b on the Strategic Plan's proposed allocations. Please could you review and provide any feedback on the document.

We'd appreciate it if we could have comments back by the end of August.

Please treat all information received as confidential.

Kind regards,

Katie

Katie Hancock
Planning Policy Officer

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Appendix E: Lead Local Flood Authorities response to SFRA update

From: [REDACTED]
Subject: RE: Greater Notts SFRA
Date: 03 October 2023 13:44:25

Hi Katie,

No concerns from our side, happy with the review that's been undertaken.

Many thanks,

Callum Smith

Callum Smith
Principal Officer - Flood Risk Management
Single Point of Contact for Drones
LEVI Project Officer
Highways and Transport

Nottinghamshire County Council

[REDACTED]

[REDACTED]

Flood Risk Management Team, Nottinghamshire County Council,
County Hall, Loughborough Road, West Bridgford, Nottingham, NG2 7QP

From: Katie Hancock [REDACTED]
Sent: 03 October 2023 13:42
To: Callum Smith [REDACTED]
Cc: John.King2 [REDACTED]
Subject: RE: Greater Notts SFRA

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OFFICIAL

Hi Callum,

I've now received formal comments from the EA and the City flood risk team confirming their approval of the SFRA review. I'm just waiting on feedback from yourself - if you could please let me know if you are also satisfied or if you have any queries.

Kind regards,

Katie

Katie Hancock
Planning Policy Officer

[REDACTED]

From: Katie Hancock
Sent: 21 September 2023 15:57
To: [REDACTED]
Subject: Greater Notts SFRA

OFFICIAL

Hi Callum,

Hope you're feeling better soon!

You didn't miss too much from the meeting - we mainly checked with the EA that they were satisfied with our approach of doing a review whilst multiple models are being updated, and they confirmed they were. We're now just waiting formal comments in writing from them.

I've received comments via email from the city flood risk team confirming they're happy with the contents. All I'd need from you is something similar confirming you're happy with the SFRA, or if you have any concerns let me know.

Kind regards,

Katie

Katie Hancock
Planning Policy Officer



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