Kirklees Level 1 SFRA - Appendix E

Guidance on how to use flood risk data as part of a sequential test

April 2026

Prepared for:
Kirklees Council

www.jbaconsulting.com

Carbon Footprint

The format of this report is optimised for reading digitally in pdf format. Paper consumption produces substantial carbon emissions and other environmental impacts through the extraction, production and transportation of paper. Printing also generates emissions and impacts from the manufacture of printers and inks and from the energy used to power a printer. Please consider the environment before printing.

Purpose and Disclaimer

This document has been prepared as a Report to outline an appropriate approach to SFRA information to inform the sequential test. JBA Consulting accepts no responsibility or liability for any use that is made of this document other than by the Client for the purposes for which it was originally commissioned and prepared.

JBA Consulting has no liability regarding the use of this report.

Copyright

© Jeremy Benn Associates Limited 2026

Contents

1 Introduction 1

1.1 Background 1
1.2 Summary of changes 1
1.3 What happens next 4

2 Summary of influential changes to the NPPF and implications for sequential and exception tests 5

2.1 River and sea risk 7
2.2 Surface water flood risk 8
2.3 Groundwater flood risk 10
2.4 Sewer flood risk 11
2.5 Reservoir flood risk 12

3 Sequential approach at a site level 14

4 Conclusions 15

List of Figures

Figure 1-1: Diagram 2 in PPG 2

Abbreviations

AEP	Annual Exceedance Probability
BGS	British Geological Survey
BRAVA	Baseline Vulnerability and Risk Assessment
DWMP	Drainage and Wastewater Management Plan
EA	Environment Agency
FRA	Flood Risk Assessment
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
RBCS	Risk based catchment screening
RoFSW	Risk of Flooding from Surface Water
NPPF	National Planning Policy Framework
PPG	Planning Policy Guidance
SFRA	Strategic Flood Risk Assessment

1 Introduction

1.1 Background

JBA Consulting have produced this sequential test methodology for reference and sharing with local planning authorities (LPA), lead local flood authorities (LLFA) and the Environment Agency (EA).

The need to address this matter arises from the significant revision to the National Planning Policy Framework (NPPF) in July 2021, the revisions to the accompanying Planning Practice Guidance (PPG) in August 2022, and the March 2025 release of the revised Flood Map for Planning.

The scope and extent of changes to the PPG in August 2022 require that additional analysis and mapping is prepared so the content of SFRAs addresses the matters introduced in the updated guidance and provides the evidence to support the preparation of the sequential test.

This document addresses the use of flood risk information in the performance of the sequential test with the aim of confirming that the LPA, LLFA and EA are in agreement with the proposed flood risk approach but does not include the consideration of wider planning issues, as set out in the sustainability appraisal.

1.2 Summary of changes

1.2.1 NPPF

Paragraph 174 of the NPPF has been changed such that the sequential test must now *"steer new development to areas with the lowest flood risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.*

The sequential approach (as described in Para 173) should be taken to individual applications in areas known to be at risk now or in future from ***any form of flooding****."*

Prior to the changes to the NPPF the requirement was set out as follows and only required consideration of river and sea flood risk when applying the sequential test:

Previous Policy Wording	Latest Policy Wording (since July 2021)
The aim of the sequential test is to steer new development to areas with the lowest risk of flooding (the PPG advised that the exercise should be performed using the flood zones, as describe river and sea flood risk assuming there are no flood risk management measures	The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from **any source** (The Planning Practice Guidance has not yet been updated to describe how this exercise should be

Previous Policy Wording	Latest Policy Wording (since July 2021)
or defences in place)	performed)

1.2.2 PPG

The PPG application of the sequential test diagram (Figure 1-1) shows that flood risk should preferably be considered in terms of low, medium, and high-risk areas, both now and in the future. To address this requirement, it is necessary to explicitly consider the effects of climate change when performing the sequential test. It is important to recognise that the new guidance advises that the sequential test can no longer be performed by simply using the present-day flood zones describing risk from rivers and the sea.

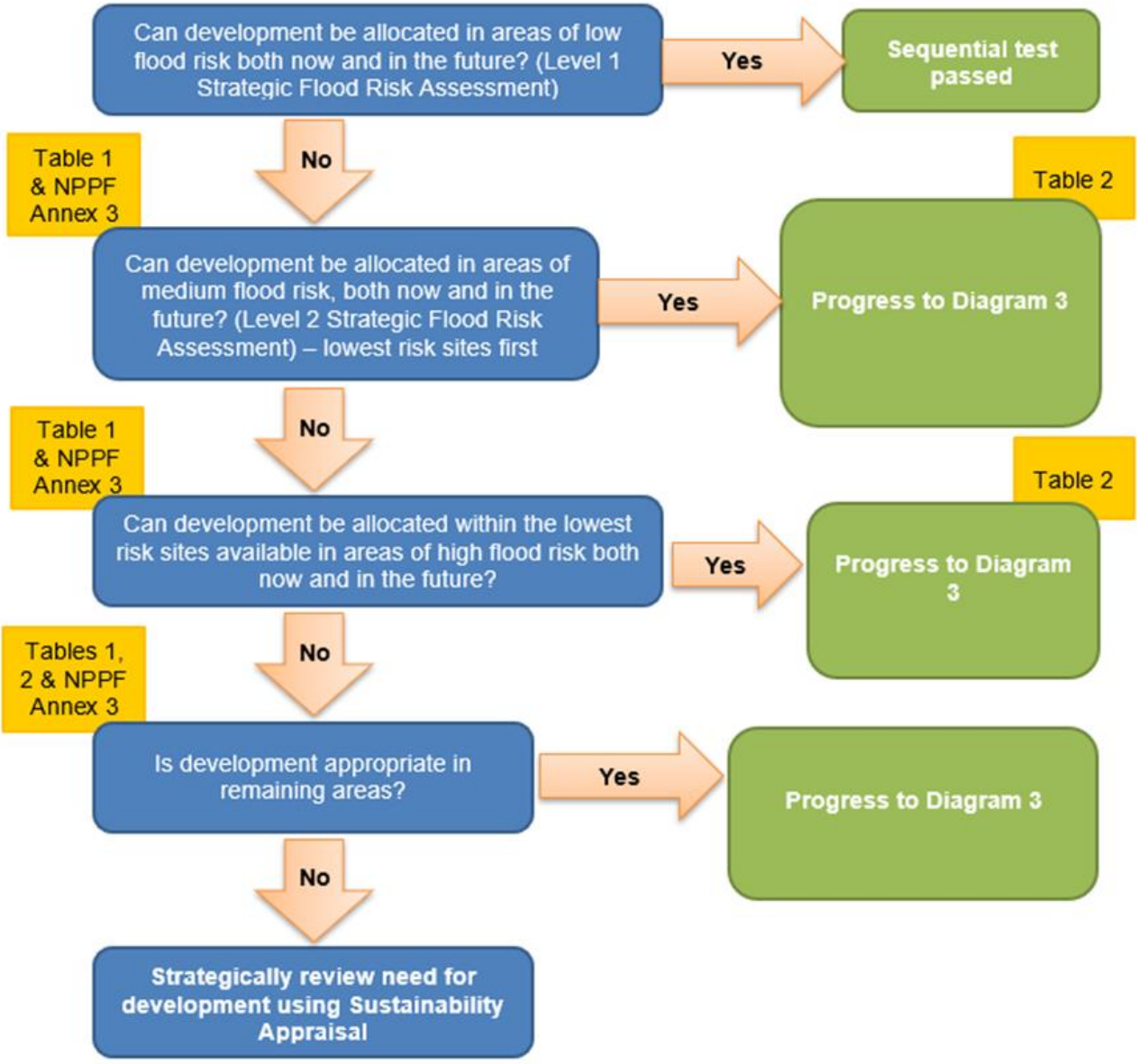


Figure 1-1: Diagram 2 in PPG

In addition, the PPG now also notes that where neighbourhood plans are considering proposing development, they should address how this would be consistent with the LPA's application of the sequential test and if necessary, the exception test for the plan. If not, these tests will need to be re-visited on a local authority-wide basis.

1.2.3 Flood Map for Planning

The EA published a revised Flood Map for Planning on 25 March 2025, including for the datasets described below, which should be used to inform application of the sequential test. However, there should be local agreement with the EA on the suitability of the 3.3% annual exceedance probability (AEP) defended dataset and the Rivers and Sea data for use in applying the sequential test.

1.2.3.1 Flood Zones

The Flood Zones show the extent of land at present day risk of flooding from rivers and the sea, ignoring the benefits of defences, for the following scenarios:

- Flood Zone 1 – Land having a less than 0.1% (1 in 1000 year) AEP of flooding.
- Flood Zone 2 – Land having between 0.1% - 1% (1 in 100 to 1 in 1000 year) AEP of flooding from rivers or between 0.1% - 0.5% (1 in 200 to 1 in 1000 year) AEP of flooding from the sea and accepted recorded flood outlines.
- Flood Zone 3 –Land shown to be at a 1% (1 in 100 year) or greater AEP of flooding from rivers or 0.5% (1 in 200 year) or greater AEP of flooding from the sea.

The Flood Zones are a composite dataset including national and local modelled data, and information from past floods.

1.2.3.2 3.3% AEP defended dataset

Present day and future defended 3.3% (1 in 30 year) AEP of flooding from rivers and the sea. This dataset should be the starting point for LPAs to delineate the functional floodplain (Flood Zone 3b) and a future Flood Zone 3b through the SFRA, subject to local agreement with the EA.

- The specific climate change scenarios used include:
  - Central allowance for the 2080s epoch (2070-2125) for risk of flooding from rivers
  - Upper End allowance for risk of flooding from the sea, accounting for cumulative sea level rise to 2125.

1.2.3.3 Rivers and Sea data

This data is designed to support the use of the Flood Zones and includes flood events with and without defences for present day and with the impacts of climate change:

- Present day and future defended and undefended:

- Undefended: 0.1% AEP (1 in 1000) rivers and sea
- Undefended: 1% AEP (1 in 100) rivers and 0.5% AEP (1 in 200) sea
- Defended: 0.1% AEP (1 in 1000) rivers and sea
- Defended: 1% AEP (1 in 100) rivers, 0.5% AEP (1 in 200) sea

The specific climate change scenarios used include:

- Central allowance for the 2080s epoch (2070-2125) for risk of flooding from rivers
- Upper End allowance for risk of flooding from the sea, accounting for cumulative sea level rise to 2125.

The Rivers and Sea data may show inconsistent results where localised or national modelling has been used or where there is currently poor quality of data.

1.2.3.4 Surface water

Risk from surface water flooding is now included in the Flood Map for Planning and includes for the following present day events:

- 0.1% AEP (1 in 1000 year)
- 1% AEP (1 in 100 year)
- 3.3% AEP (1 in 30)

Note: the climate change information currently available for surface water flood risk is not sufficient for use in planning. This is because the time-horizons and climate change scenarios used are likely to fall short of what is needed to assess planned development.

Risk from surface water flooding is also represented by the Risk of Flooding from Surface Water (RoFSW) dataset, separate to the Flood Map for Planning. This dataset can also aid application of the sequential test.

1.3 What happens next

Formal confirmation is sought from the LPA, LLFA and EA to confirm that the proposed approach outlined in this document to address flood risk and the sequential test will be supported in principle at Examination.

The content of the SFRA should be prepared on the basis of the agreed approach.

Where required, a Level 2 SFRA or site-specific flood risk assessment will involve more detailed consideration of surface water drainage, reservoir flooding and groundwater than was the case prior to the NPPF and PPG updates. The implications of this have not been assessed in this document.

In circumstances where the proposed approach requires more detailed consideration of surface water drainage in a Level 2 SFRA the LLFA, and the applicable water company (responsible for sewerage) should be consulted to confirm circumstances where there is long term reliance on the performance of existing drainage systems affected by lack of

capacity as a consequence of climate change effects (increased rainfall intensities and depths).

2 Summary of influential changes to the NPPF and implications for sequential and exception tests

The sequential test, based on the sequential approach, was originally conceived to direct proposed new development to locations that did not rely on flood risk management features, so they are inherently safe and don't place a burden on future generations. The test was previously performed using a set of "zone" maps that showed the extent of river flooding for circumstances where no defences were present for events with high, medium, and low probability. This provided a logical conceptual basis for the placement of proposed new development that would not require investment in flood risk management (and so not place a burden on future generations).

The test process recognised that in some circumstances it would not be possible to locate development in locations outside of medium and high-risk flood zones, as there are no reasonable alternatives. An obvious circumstance being proposed town centre development in locations of high flood risk, as it is not possible to redevelop town centre sites unless they remain in the town centre. In circumstances where the sequential test has been performed, and it is not possible for development to be located in areas with a lower risk of flooding, the policy requires that the exception test is performed. The exception test is a two-part process that requires preparation of evidence to demonstrate that development proposals at risk of flooding deliver wider sustainability benefits and that it can be made safe for the intended lifespan (thus it is a requirement to demonstrate that proposed development will be safe under climate change conditions).

The updated NPPF recommends that application of the sequential test applies to any source of flooding. The updated PPG further states in paragraph 23:

"Other forms of flooding need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so that the sequential approach can be applied across all areas of flood risk".

The general implications of these are summarised as follows:

- The sequential test must be based on mapping that enables decision making according to a prioritisation based on a risk-based sequence (for river and sea flooding, mapping is available nationally that describes low, medium and high-risk flood zones but comparable mapping of this specific type and quality is not available for other sources.
- The other sources of flood risk that can potentially be included in the sequential test are surface water, groundwater, sewer flooding, and reservoir flooding (or other water impounding features such as canals).
- It follows that proposed new development placed in locations at high or medium risk of flooding from other sources now and in the future (note that the explicit

requirement to include climate change in the test, as set out in the August 2022 PPG may require the preparation of additional modelling and mapping or use of proxies) should be accompanied by evidence that the site can remain safe for its lifetime or that the exception test can be satisfied (through a Level 2 SFRA).

The exception test is required if development is:

- Highly vulnerable and in an area of medium flood risk
- Essential infrastructure in areas of high flood risk or functional floodplain
- More vulnerable in areas of high flood risk

The exception test in the SFRA provides additional evidence to demonstrate that the principle of development can be supported at a proposed site and shows that the sustainability benefits of the development to the community outweigh the flood risk.

A basic requirement for the sequential test to be performed is that appropriate, competent mapping can be prepared to enable logical comparison of the flood risk from different sources at alternative locations, both now and in the future, as this is fundamental to establishing a logical "risk sequence".

The following summary describes the implications of including different sources of flooding both now and in the future in the sequential test. It also highlights matters to be considered and identifies a preferred approach.

2.1 River and sea risk

2.1.1 Implications

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test
Rivers and sea	Flood Map for Planning: Flood Zones 2 and 3, River and Sea data with and without defences present day and with climate change. Functional floodplain from LPA's SFRA. Local detailed models	• The sequential test can be carried out using the Flood Map for Planning for present day low (Flood Zone 1), medium (Flood Zone 2) and high risk (Flood Zone 3); and the LPA's functional floodplain, as previously was the case. • Additionally, the Rivers and Sea data (defended and undefended for both present day and with climate change), and water storage areas (if the LPA's SFRA defines as functional floodplain (Flood Zone 3b)) should also be used. • Where detailed models are available that are not included in the Flood Map for Planning, present and future Flood Zones 2 (0.1% AEP event), 3a (1% AEP event for rivers, 0.5% AEP for the sea) and 3b (3.3% AEP defended) can be used, in consultation with the EA. Note: fluvial and tidal models may experience instabilities when modelling the 0.1% AEP plus climate change event meaning results cannot be prepared. • National modelling is used to delineate Flood Zones where up to date detailed modelling is not available or is not considered of the required robustness.

2.1.2 Recommendations for using river and sea flood risk in the sequential test

For present day and future flood risk from rivers and the sea, the following data should be used:

- Flood Map for Planning:
  - Flood Zones 2 and 3
  - Water storage areas (if defined as flood zone 3b)
  - Rivers and Sea data (defended and undefended)
  - For future flood risk from rivers, the EA's Flood Zones 2, 3a and 3b, with the central climate change allowance uplift for the appropriate EA management catchment, should be used where there is detailed modelling, and it is practicable to use these.
  - For future tidal flood risk, the EA's Flood Zones 2, 3a and 3b with climate change allowances (using the Central and Upper End allowances for 2125 to

account for the potential vulnerability of proposed development on low lying coastal areas to climate change effects) should be used where there is detailing modelling, and it is practicable to use these.

- The LPA's functional floodplain delineated through the SFRA.
- Where the Flood Map for Planning uses national modelling, consider consulting detailed local flood models which may have been produced since the Flood Map for Planning was revised.
- Where national modelling has been used to delineate Flood Zones and where not practicable to use detailed modelling, Flood Zone 2 could be used as a proxy for Flood Zone 3a with climate change and Flood Zone 3a can be used as a proxy for Flood Zone 3b with climate change. If a development site is located within Flood Zone 2 using national modelling, then an assessment of climate change for this zone can be undertaken at the Level 2 SFRA stage.

2.2 Surface water flood risk

2.2.1 Implications

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test
Surface Water	Flood Map for Planning, Risk of Flooding from Surface Water (RoFSW) dataset	• Produced using national scale modelling and enhanced with compatible, locally produced modelling from LLFAs. • Generally suitable for showing surface water flow routes at different probability flood events (3.3% AEP, 1% AEP and 0.1% AEP), although the uncertainty associated with the predicted outlines for the respective probabilities is high. • Doesn't always include allowance for drainage features such as culverts and can over or underestimate flooding where there are linear features such as embankments. • Unlike the Zone maps for river and tidal flooding, the surface water mapping makes an allowance for the assumed performance of a local drainage system. • Normal profile of extent and shape of surface water flooding is a "dendritic" pattern that follows low lying topography and is not an extensive blanket, as is most often the case for river and tidal flooding.

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test
		• The flood risk is normally more likely to be relatively short lived and much more localised than would be the case for river and tidal flooding (most likely being caused by local high intensity short duration rainfall events). • It is likely that in many circumstances surface water flood risk zones based on the surface water mapping could affect a relatively small proportion of a proposed allocation site, but in practical terms this might not in itself be a factor that demonstrates that the principle of development could not be supported. • EA guidance states the RoFSW dataset is not suitable for identifying whether an individual property will flood. Because of the way they have been produced and the fact that they are indicative, the maps are not appropriate to act as the sole evidence for any specific planning or regulatory decision or assessment of risk in relation to flooding at any scale without further supporting studies or evidence.

2.2.2 Recommendations for using the RoFSW in the sequential test

- For present day flood risk from surface water, the EA's RoFSW high, medium and low risk zones should be used.
- For future risk, the climate change information currently available for surface water flood risk is not sufficient for use in planning, according to the EA. alternatively, proxies could be used whereby the low risk event (0.1% AEP) is used to represent the medium risk event (1% AEP) in the future.
- Assess the confidence categories included in the RoFSW dataset. Further, more detailed surface water modelling may be required confidence is low.

2.3 Groundwater flood risk

2.3.1 Implications

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test
Groundwater	JBA Groundwater Emergence Map. British Geological Survey (BGS) Groundwater flood susceptibility maps	• BGS mapping does not show the likelihood or risk of groundwater flooding occurring, i.e., it is a hazard and consequence-based product and does not enable application of risk-based approach. • JBA groundwater map does potentially enable a risk-based approach to be taken as it depicts different levels of risk. However, this is based on the risk of **emergence** of groundwater and not surface flooding due to groundwater and it should be noted that the location of highest risk of emergence might not be coincident with the location at highest risk of flooding. The analyses performed to prepare the mapping are all for a 1 in 100-year event (1% AEP) and so provide a risk of groundwater emergence to the surface as they are based on predicted difference between groundwater level and the ground surface. Five zones are defined to describe the risk of groundwater being: at or very near ground surface; between 0.025m and 0.5m below the ground surface; between 0.5m and 5m below the ground surface; at least 5m below the ground surface; and negligible risk of groundwater flooding. • The underlying challenge with these datasets is that the data is very uncertain and could not be used with confidence unless supported by more detailed local studies. The mapping provides an indication of where risk of elevated groundwater levels might be higher, but it would not be easy to defend. • There is no climate change mapping available for groundwater and in view of the uncertainty in the present day data it is unlikely that such mapping will be available in the near future.

2.3.2 Recommendations for using zone maps for groundwater flooding

It is recommended that the groundwater flood risk is not considered in the sequential test on the basis that the JBA groundwater flood map does not provide the confidence or certainty required to undertake the sequential test. As the available mapping does not provide competent evidence on the relative risk of flooding, it could potentially result in inappropriate allocations if used without understanding the limitations of the data.

JBA Groundwater mapping should therefore be used in conjunction with other relevant sources of flooding such as historical flood records so that areas can be identified that are unlikely to be affected by groundwater flooding (low potential) and also areas where groundwater flooding is potentially a material consideration can be identified (high potential). The combination of these datasets can then accommodate an appropriate level of sequential testing. At the Level 2 SFRA stage (or for a site-specific Flood Risk Assessment), more detailed assessment should be performed of the proposed development sites where the potential for groundwater flooding is high. This will address the potential effects of climate change on groundwater flood risk to the extent permissible by the available data.

2.4 Sewer flood risk

2.4.1 Implications

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test
Sewer flooding risk	Water company historic flood records	Only available at postcode level and thus mapping does not define spatial extent or location of sewer flooding.

2.4.2 Recommendations for using zone maps for sewer flooding

It is recommended that sewer flood risk is not considered in the sequential test on the basis that the available information is not of appropriate resolution or format and so does not support spatial comparison of risk.

Water companies were required to publish Drainage Water Management Plans for river basin catchments across England as part of the Environment Act. The plans describe the basis for long term investment proposals by water companies that span over 25 years and set out the commitment needed to make wastewater systems safe and secure. The plans contain substantive volumes of mapping, information and data that has not previously been made available by water companies. As part of the DWMP process, a risk-based catchment screening (RBCS) exercise should have been completed, where existing, readily available data was used to identify where there is a current and/or potential risk or vulnerability in the sewer catchment to future changes, such as new residential development or changes in climate. This feeds into a baseline risk and vulnerability assessment (BRAVA) enabling comparison across locations based on different levels of risk.

The resolution of DWMP data is generally catchment scale. Consequently, it is not possible to take a risk-based approach using this data and it is not considered to be comparable to the river and sea flooding information. If specific spatial information becomes available on sewer flood risk that provides competent data on the spatial relative risk of flooding this should be evaluated in a Level 2 SFRA and as appropriate inform the sequential test process.

2.5 Reservoir flood risk

2.5.1 Implications

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test

Reservoir flooding risk	EA Reservoir Flood Mapping (RFM)	• The mapping shows “wet day” and “dry day” reservoir inundation extents. The “wet day” being a reservoir breach at the same time as a 0.1% AEP river flood (as this is a likely time when a reservoir might fail) and the "dry day" shows the failure just from the water retained by the dam.
		• Neither set of mapping describes a risk-based scenario as it does not provide the probability of a dam failure but are intended to describe a “worst credible case”.
		• More detailed information on flood velocities and depths have been prepared as part of the modelling and mapping study, but this is not publicly available and can only be viewed by those with appropriate security classifications. The flood extents are publicly available.
		• A dataset exists which shows where the impact of "wet day" reservoir flooding affects the fluvial flood extent. This is known as the Reservoir Flood Extents - Fluvial Contribution. This can be used to identify areas where:
		  ○ reservoir flooding is predicted to make fluvial flooding worse.
		  ○ reservoir flooding is not predicted to make fluvial flooding worse.
		• The mapping could be used to direct proposed new development away from locations that could potentially be affected by reservoir flood risk. However, it would not be conceptually similar to the risks pertaining to river and sea flooding and further assessment would be required to understand the magnitude of the potential hazard.

Source of Flooding	Available Mapping	Implications of making use of mapping in the sequential test
		• A consideration with respect to the reservoir maps is that placing new development in locations predicted to be affected by reservoir inundation could potentially change the "risk category" of the reservoir and this could result in the reservoir owner (the "undertaker") having to invest in substantive remedial works to demonstrate that the reservoir had the appropriate level of safety. This is not strictly related to the sequential test but should be a consideration that should be appropriately managed when planning new development. • The mapping does not provide climate change information on future flood risk and provision of such mapping is unlikely based on the existing methodology.

2.5.2 Recommendations for using zone maps for reservoir flooding

It is recommended that the available reservoir flood mapping is not included in the sequential test as the available data is inappropriate to be used alongside risk mapping from other sources when performing the sequential test.

A more detailed assessment of those sites identified to be at risk of inundation should be included in a Level 2 SFRA. It should be made clear in the Level 1 SFRA that the available information is not conceptually similar to the risks pertaining to river and sea flooding as it shows the worst credible case and not the risk of flooding and so does not support a logical spatial comparison of risk that can be substantiated by appropriate evidence.

The RFM Fluvial Contribution Extent can be used to identify areas where:

- reservoir flooding is predicted to make fluvial flooding worse.
- reservoir flooding is not predicted to make fluvial flooding worse.

A more detailed assessment in a Level 2 SFRA would identify locations where proposed development could result in a change to the risk designation of a reservoir. If proposed sites are located in a zone at reservoir risk, it will be necessary to understand the extent to which the flooding could be made worse and to report on the implications with respect to allocating the land for development. On that basis such an approach is recommended. If proposed development is located in a high hazard zone in the vicinity of an existing dam structure the implications should be considered in a Level 2 SFRA or site-specific Flood Risk Assessment and where appropriate an assessment made of whether alternative sites should be considered in accordance with the sequential test.

3 Sequential approach at a site level

Para 175 of the NPPF states:

"*The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).*"

Developers may therefore not have to apply the sequential test where it can be shown that built development can remain outside of areas of flood risk. This must be evidenced through a site-specific FRA. Otherwise, the sequential approach must be applied within the site, once the sequential test has been passed, to enable development to be placed in locations at lowest risk of flooding (by avoiding high and / or medium risk areas that might exist within the site.

It should be noted that in most circumstances the flooding from different sources is likely to affect the same “low lying” location within a proposed site, and therefore site selection should usually not be based on the number of different sources of flooding that could affect a site. Also, it is not strictly appropriate to seek to suggest that flood risks from different sources can be simply combined to derive a combined risk or ranking, as the logic and likelihood of such conclusions cannot easily be evidenced by the supporting data.

4 Conclusions

This technical note has been prepared to formalise the flood risk arrangements used by LPAs in performing the sequential test. Updates to the August 2022 PPG recommend that the sequential test now assesses all sources of flooding for low to high risk areas both now and in the future.

A review of readily available information has been undertaken to assess suitable data sources which could be considered for other sources of flood risk not previously included in the sequential test.

For river and sea flood risk, it is recommended that the EA's Flood Map for Planning datasets are used for both the present day and future.

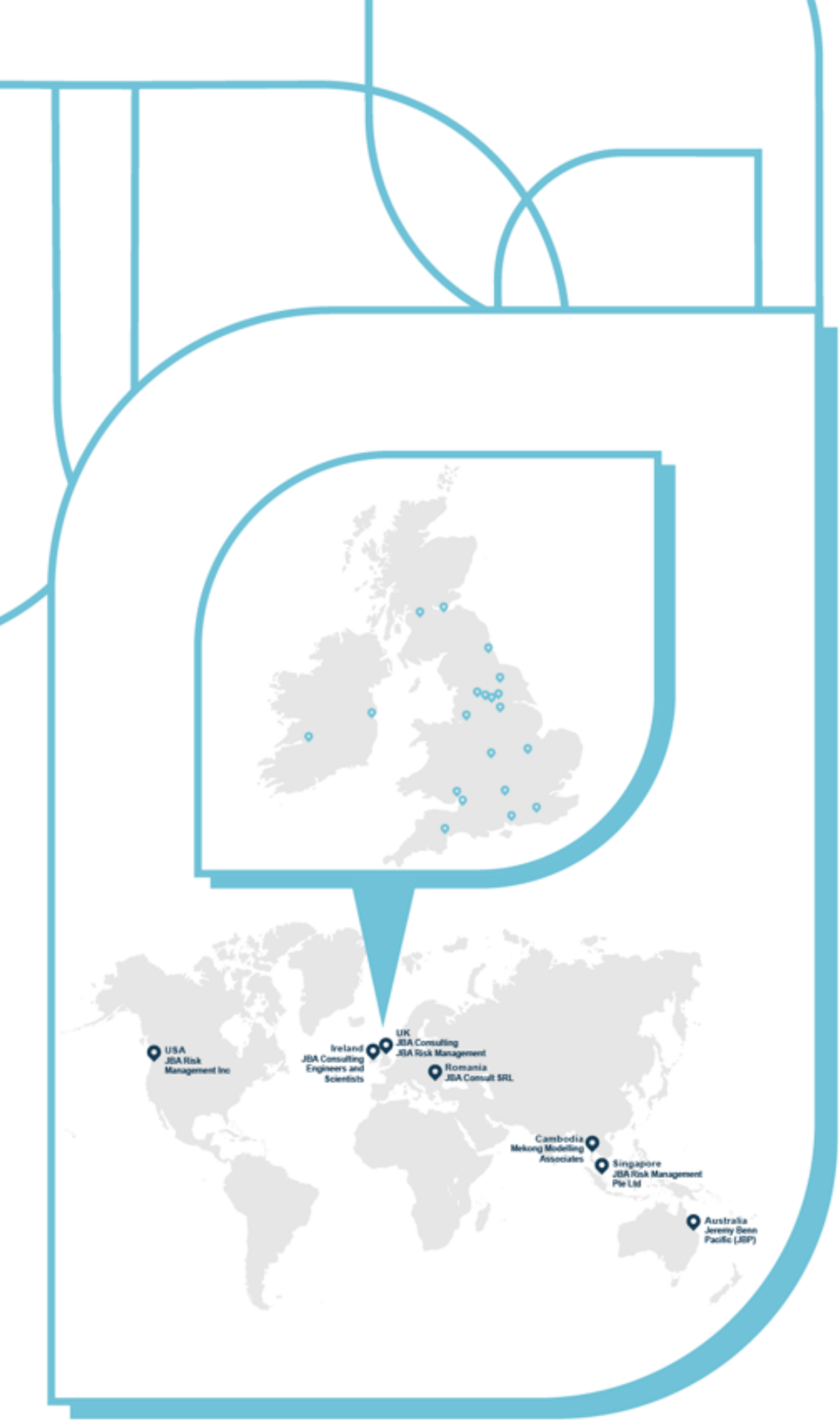
For surface water flood risk, it is recommended that the EA's Risk of Flooding from Surface Water should be used for present day. A proxy should be used, as detailed in this note, to assess potential future risk. It should be noted that the Risk of Flooding from Surface Water includes an allowance for drainage (a flood risk management feature), so this is not strictly the same conceptual risk as defined for river and sea flooding (even though it is associated with the same probability). However, it does create a method that can accommodate sequential testing, as it facilitates strategic decisions that direct development to land in a “low risk surface water flood zone”.

For reservoir flood risk, potential high-risk zones should be assessed and identified and if allocated sites are located in such zones, then the implications should be addressed in a Level 2 SFRA or site-specific Flood Risk Assessment for windfall sites.

The readily available datasets for groundwater and sewer flood risk do not competently define areas of high or low risk of flooding and so more detailed assessment should be performed in a Level 2 SFRA (for allocated sites) and site-specific Flood Risk Assessment (for windfall sites) to inform the sequential test.

If the local planning authority considers that the sequential test is performed and it is not possible for development to be located in areas with a lower risk of flooding, then consideration must be given to the exception test and more detailed assessment included in a Level 2 SFRA or site-specific Flood Risk Assessment.

Consultation should be sought from the LLFA and the EA for their comments on the methodology and approval in principle to the approach should be obtained for inclusion in the SFRA.



Offices at

Bristol
Coleshill
Doncaster
Dublin
Edinburgh
Exeter
Glasgow
Haywards Heath
Leeds
Limerick
Newcastle upon Tyne
Newport
Peterborough
Portsmouth
Saltaire
Skipton
Tadcaster
Thirsk
Wallingford
Warrington

Registered Office
1 Broughton Park
Old Lane North
Broughton
SKIPTON
North Yorkshire
BD23 3FD
United Kingdom

+44(0)1756 799919
info@jbaconsulting.com
www.jbaconsulting.com
Follow us:

Jeremy Benn Associates Limited

Registered in England 3246693

JBA Group Ltd is certified to:
ISO 9001:2015
ISO 14001:2015
ISO 27001:2013
ISO 45001:2018