East Devon Local Plan – Topic Paper CCF - 004

Adaptation and Resilience to Climate Change: Flood Risk

Second Regulation 19 consultation September 2025

East Devon – an outstanding place

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Cover photograph taken by planning policy team in Colyton.

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1 Introduction

1.1 This topic paper sits behind and helps to explain the content of and evolution of the Publication draft of the East Devon Local Plan. This paper updates the paper that supported the first Regulation 19 version of the plan and there may be new versions of this topic paper as plan making progresses into and through plan Examination.

1.2 This topic paper provides a summary of the approach that has been taken to flood risk in the development of policies and the allocation of sites in the second Regulation 19 plan. It is underpinned by the Strategic Flood Risk Assessment[1] (SFRA) undertaken in support of the local plan.

1.3 Changes to flood and coastal erosion risk information[2] were made in 2025 and the National Flood Risk Assessment (NaFRA2) has been used to update the 'Flood map for planning'[3]. The SFRA[4] produced in 2024 to support the first round of level 2 assessments recommended that the surface water risk assessment be reviewed in light of NaFRA2 because improved analysis techniques will reduce some uncertainties (although the updated mapping is unlikely to fundamentally change the locations identified to be at risk). During 2025, as part of ongoing SFRA level 2 work, a high-level assessment was undertaken comparing the new NAFRA2 datasets with the previous datasets[5]. This reviewed all the plan allocations to identify any areas where there were significant increases (5% increase in flood extent in the new mapping compared to previous). This showed that there had been no significant change in most of the sites allocated in the second Regulation 19 plan. Advice was sought from the Environment Agency on whether any additional assessment of the work previously undertaken is needed to consider the implications of the NAFRA2 mapping change and no requests for any additional work have been made. Further details of the approach to assessing the four additional sites are given in paragraph 5.11 of this report.

1.4 This paper is structured to include a brief summary of both the overall flood risk in East Devon and national planning policy/guidance relevant to local plan production. This is followed by a summary of the SFRA and an explanation of how this informed the local plan. An explanation is given of the general approach that has been taken to directing development away from areas of highest flood risk through the production of the local plan. This is followed by a summary of the sequential and exception testing undertaken, with further details being included as Appendices.

[1] Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon
[2] New national flood and coastal erosion risk information - GOV.UK
[3] Flood map for planning - GOV.UK
[4] Paragraph 3.6 of ccf-003-level_2_sfra_report.pdf
[5] CCF-003 Appendix D site screening October 2025 Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

2 Overview of flood risk in East Devon

2.1 Large parts of East Devon are at risk of flooding from a variety of sources. Further details are included in the SFRA, and summary maps are included in the appendices to this report.

2.2 Fluvial flood risk emanates from the River Exe, River Clyst, River Otter, River Sid, River Axe and their tributaries. Appendix A includes a map of watercourses. These watercourses present fluvial flood risk to rural communities as well as to the main urban areas in East Devon. Appendix B includes a map of flood zones, including fluvial.

2.3 The area's most at risk of tidal flooding are Exmouth, Budleigh Salterton, Sidmouth and Seaton. In some places along the coastline, such as settlements along the Exe estuary, tidal flood risk can occur in combination with fluvial and surface water sources which can exacerbate flood risk. Appendix B includes a map of flood zones, including tidal.

2.4 Surface water flooding predominantly follows the topographical flow paths of existing watercourses or dry valleys with some isolated ponding located in low lying areas. There are also considerable flow routes along some roads. Appendix C includes a map of surface water flooding.

2.5 Areas with recorded sewer flooding incidents include Exmouth, Ottery St Mary, Budleigh Salterton, Honiton, Woodbury, Sidmouth, Axminster, Clyst St Mary, Seaton and Colyton. Historic sewer flood data is only available at a postcode level and does not define its spatial extent or location, so no mapping is available[6].

2.6 The areas with the shallowest groundwater levels generally follow the flow paths of the major watercourses, particularly along the River Otter valley and its tributary valleys, in areas close to the River Clyst in the west of East Devon and areas in the River Exe valley. Appendix D shows groundwater levels.

2.7 There is a potential risk of flooding from reservoirs both within the district and from those outside, but the level and standard of inspection and maintenance required under the Reservoirs Act means that the risks are relatively low. Appendix E shows potential reservoir flooding.

2.8 There are no canals identified in East Devon.

[6] See paragraph 3.2.4 of SFRA level 1 report at IEZ-JBAU-XX-XX-RP-HM-0001-A1-C01-Level_1_SFRA

3 National Policy Context

3.1 The National Planning Policy Framework[7] (NPPF) requires the local plan to have regard to the long-term implications of flood risk and to help manage flood risk from all sources, taking account of the future impacts of climate change. It states that strategic policies should be informed by a strategic flood risk assessment and that a sequential, risk-based approach should be applied to the location of development to avoid, where possible, flood risk to people and property. Plans should also: safeguard from development any land likely to be required for flood management; secure green and other infrastructure that will reduce flooding and consider relocating existing development to more sustainable locations where climate change is expected to increase flooding.

3.2 There is extensive national planning policy guidance on flood risk[8], and this is supported by further technical guidance on issues, including how to prepare a strategic flood risk assessment (SFRA). The guidance explicitly requires flood risk to be taken into account in the preparation of strategic policies by undertaking a 'Level 1' SFRA.

3.3 Further national policy and guidance is highlighted with the relevant part of this report.

[7] All references to the NPPF are to the December 2023 version, under which the local plan will be examined, unless otherwise stated.
[8] Flood risk and coastal change - GOV.UK

4 The East Devon Strategic Flood Risk Assessment Level 1 (SFRA L1)

4.1 The SFRA level 1 was prepared by JBA[9] in accordance with national guidance[10] and advice[11]. The Environment Agency; Devon County Council (as Lead Local Flood Authority); South West Water; Devon and Somerset Fire and Rescue Service and the neighbouring local planning authorities were consulted during the preparation of the SFRA L1. It was published in February 2024 and provides a comprehensive and robust evidence base on flood risk issues to support the policies and allocations in the Regulation 19 Local Plan. Further details are included in the SFRA Level 1 report[12] and its appendices[13].

4.2 The key outputs of the SFRA level 1 were:

a. Identification of policy and technical updates.

b. Identification of any strategic flooding issues or cumulative effects which may have cross boundary implications.

c. Appraisal of all potential sources of flooding, including main river, ordinary watercourse, surface water, sewers, groundwater and reservoirs.

d. Review of historic flooding incidents.

e. Reporting on the standard of protection provided by existing flood risk management infrastructure.

f. Mapping of distribution of flood risk across all Flood Zones from all sources of flooding including climate change allowances.

g. Assessment of the potential increase in flood risk due to climate change.

h. Flood Risk Assessment guidance for developers.

i. Assessment of surface water management issues, how these can be addressed through development management policies and the application of Sustainable Drainage Systems.

j. Recommendations of the criteria that should be used to assess future development proposals and the development of a Sequential Test and sequential approach to flood risk.

k. Assessment of strategic flood risk solutions that can be implemented to reduce risks.

[9] Welcome to JBA Consulting
[10] How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk)
[11] Preparing a flood risk assessment: standing advice - GOV.UK (www.gov.uk)
[12] IEZ-JBAU-XX-XX-RP-HM-0001-A1-C01-Level_1_SFRA
[13] Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

4.3 Appendix N[14] of the SFRA level 1 includes the results of site screening for 937 sites which were being considered for the Regulation 18 local plan[15], including the three options for a new settlement. These sites were identified through East Devon District Council's 2022 HELAA[16] and were screened against a suite of available flood risk information and spatial data to provide a summary of risk to each site. This identified the proportion of each site that is affected by the different sources of flooding and helped to inform the sequential approach to site allocation.

4.4 The SFRA L1 informed Strategic Policy AR:01 Flooding[17]. This policy seeks to deliver developments and communities which are resistant and resilient to future floods by:

a. taking a sequential approach to the location of development;

b. setting requirements for individual flood risk assessments;

c. setting standards for sustainable drainage systems;

d. protecting land required for flood management;

e. prohibiting basements in areas at risk of flooding;

f. promoting, where appropriate, natural flood management, retrofitting of sustainable urban drainage and 'daylighting' culverts;

g. designing schemes to take account of any SFRA level 2 recommendations; and

h. taking special measures in areas at a high risk of cumulative flooding.,

[14] iez-jb-3.pdf
[15] Draft Local Plan Consultation - Nov 2022 to Jan 2023 - East Devon
[16] Evidence and Examination Library - Housing (HOU) - East Devon
[17] Evidence and Examination Library - Core Submission Documents (CSD) - East Devon

5 The East Devon Strategic Flood Risk Assessment Level 2 (SFRA L2)

5.1 Following the SFRA L1 work, JBA screened potential site allocations against a suite of available flood risk information and spatial data to provide a summary of risk[18]. This provided an effective and efficient way of identifying sites likely to require a Level 2 SFRA and enabled flood risk to be accounted for when considering allocation options, in line with the sequential approach.

5.2 The 149 sites that were screened at this stage were being considered as potential site allocations for the Regulation 19 local plan. A summary of the full site screening is included as Appendix D[19] to the SFRA level 2[20] report.

5.3 Sites were recommended for a SFRA L2 assessment if greater than 10% of the site area was within the following flood extents:

a. Surface water 1% Annual Exceedance Probability (AEP) +65% climate change.

b. Flood Zone 2 as a proxy for climate change • 0.5% AEP Tidal upper end allowance from detailed modelling.

c. 1% AEP Fluvial central allowance from detailed modelling.

5.4 The reservoir and historical flood risk were also considered for each site, along with any location within flood warnings/alerts, defences and previous hydraulic models. Access and egress were then also assessed for each site, identifying depths locally above and below 300mm within the surface water plus climate change flooding extent.

5.5 35 sites were identified as potentially needing a Level 2 assessment. Consideration was also given to each site to identify any site-specific information; for example, where detailed modelling was needed, or if the RoFSW dataset[21] could be used to assess flood risk.

5.6 16 sites were identified for a Level 2 assessment. The remaining 19 sites were either removed as potential allocations due to significant flood risk, amended to remove areas at risk of flooding, so that a Level 2 SFRA was no longer required; or were not otherwise considered suitable as allocations for a variety of reasons.

5.7 JBA undertook the SFRA L2 during the summer of 2024 and agreed the outputs with the Environment Agency and Devon County Council as Lead Local Flood Authority in time to finalise the work in October 2024. The report[22] includes a table of the sites not taken forward for the SFRA L2 and notes that some restraints may still apply to these sites. Flood risk from all sources will need to be carefully considered through the development management process, particularly if the if a site is in a Critical Drainage Area or there is a flood risk from groundwater or a reservoir.

[18] Paragraph 4.2 of the level 2 report summarises the site screening
[19] LVT-JBA-XX-XX-DB-HM-0002-A1-C01-Appendix_D_Site_Screening_L2.xlsm
[20] ccf-003-level_2_sfra_report.pdf
[21] Risk of Flooding from Surface Water Suitability - data.gov.uk
[22] ccf-003-level_2_sfra_report.pdf

Additionally, some sites were found to lack safe access and egress because they have flood depths greater than 300mm[23]. The report advises that these sites can still be allocated but should be assessed as part of an individual site-specific assessment and should have a Flood Response Plan produced to further consider access and egress on a site-specific basis.

5.8 The SFRA L2 includes detailed site reports for the 16 sites considered[24]. Each summary sheet includes details on the sources of flood risk, whether there are formal flood defences, emergency planning, requirements for drainage control and impact mitigation, opportunities for wider sustainability benefits/integrated flood risk management and notes on the planning implications of the assessment. The site summaries are accompanied by maps showing flood risk that include a range of climate change scenarios. In addition, for Axmi_07 (Axminster Carpets), the assessment was informed by a hydraulic modelling report[25] and a flood estimation report[26].

5.9 Of the 16 sites for which a SFRA L2 was undertaken in 2024, 13 are proposed as either individual allocations or as part of a larger allocation in the Regulation 19 local plan.

5.10 The SFRA L2 recommends that all the sites assessed should be subject to the sequential test. In addition, the SFRA L2 recommends that the mixed-use conversion and redevelopment sites at Axminster Carpets, Axminster (Axmi_07), and Baxter's Farm, Musbury (Musb_01a) and one of the housing allocations in Colyton (Coly_06) are subject to the exception test.

5.11 In January 2025, 26 additional sites that either emerged as potential allocations after the original site screening was undertaken, or where significant changes to site boundaries were made, were assessed through the screening process set out in paragraphs 5.1 to 5.4 of this report[27]. Further work was undertaken to inform the flood risk at 4 of these sites as listed in Appendix F of this report. This was undertaken after the NAFRA2 release, but before the Risk of Flooding from Surface Water (RoFSW) climate change outputs and depth, hazard and velocity information needed for a Level 2 SFRA were available (these are expected in 2026). In order to take account of the best available data, the approach set out in Appendix Y was agreed with the Environment Agency. The SFRA L2 for these sites recommends that all the sites should be subject to the sequential test and that the exception test is not required at this stage.

[23] These sites are identified in Appendix C of the SFRA L2 report
[24] Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon
[25] ccf-003-appendix-b1-xminster_hydraulic_modelling_report.pdf
[26] Axmi_07 Flood Estimation Report
[27] ccf-003-appendix-d-additional-site-screening-feb-25.pdf

6 How the sequential approach has informed the development of the local plan

6.1 The NPPF states that: "All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property"[28].

6.2 The spatial strategy of the local plan focusses growth to the western side of East Devon through a new community and other strategic allocations. It also promotes significant development in principle centres, supports development in local centres to meet the need of that settlement and the surrounding areas and allows limited development to meet local need in the service villages.

6.3 The overall approach taken to the allocation of sites in the local plan is set out in the site selection methodology[29]. This process ensures that the key elements of site assessments are recorded, including constraints like flooding and contamination, together with impacts on heritage assets, ecology and landscape. Site selection seeks to balance top-down strategic issues relating to the housing requirement and spatial strategy for the distribution of development, with the specific factors identified in the site assessments.

6.4 Flood risk has been incorporated into site assessment work throughout local plan production. This is an iterative process where evidence of factors that influence the suitability of sites for development builds up through the process. Flood risk has been considered and sites discounted accordingly at all the main stages of plan preparation. Inevitably, the evidence base that supports decisions on site allocations improves as the plan moves through stages of evidence gathering, draft proposals and consultation. This has been the case for flood risk evidence as the SFRA process has been undertaken.

6.5 The starting point for local plan allocations is the identification of potential sites from different sources. The sites identified are usually considered through the Housing and Economic Land Availability Assessment[30] (HEELA). This process is guided by a methodology[31] that excludes sites that are wholly within flood zone 3b at 'stage A' of the process. Sites at the highest risk of river and sea flooding are not therefore selected as potential local plan allocations.

6.6 The first local plan consultation that included potential site allocations was undertaken from November 2022 to January 2023[32]. Flood risk from rivers, the sea and surface water were noted as a constraint alongside other factors in the site assessment work. The accompanying Sustainability Appraisal[33] (SA) factored in flood risk and highlighted sites that had been ruled out on the grounds of flood risk.

[28] Paragraph 167 of the December 2023 NPPF
[29] site-selection-methodology-v2.pdf (eastdevon.gov.uk)
[30] Housing and Economic Land Availability Assessment - East Devon
[31] HELAA Methodology - May 2021 (eastdevon.gov.uk)
[32] Draft Local Plan Consultation - Nov 2022 to Jan 2023 - East Devon
[33] sa-of-pos-consultation-draft-lp_2022.pdf

6.7 The SFRA level 1 provided evidence of all risks of flooding in East Devon and was completed early in 2024. This was followed by scoping work for the level 2 SFRA, as described in paragraphs 5.1 to 5.4 of this report.

6.8 Site selection reports were produced for proposed allocations, and these were considered by the East Devon Strategic Planning Committee through a series of meetings through August, September, October and November 2024[34]. During the first round of meetings, sites were either allocated or 'move on' from so that they could be reconsidered later if needed to meet the housing requirement. Following this process, the yields of the allocate housing sites were totalled and compared against the housing targets the plan needs to achieve. Sites were then selected from those 'moved on' from sties for reconsideration according to a list of criteria[35]. The Strategic Planning Committee (SPC) considered a full range of issues relating to each site and allocated additional sites to meet the housing target plus an appropriate buffer. The SPC agreed the plan for Regulation 19 consultation in December 2024[36].

6.9 The local plan seeks to deliver the development levels set out in the spatial strategy primarily through allocations, but the main mechanism for guiding 'windfall'[37] development is through the definition of settlement boundaries within which development is generally acceptable in spatial strategy terms, but outside of which development is generally less acceptable.

6.10 The methodology used to define settlement boundaries is set out in a separate evidence paper[38], but, generally, flood risk is not taken into account when defining settlement boundaries. This is because it is a detailed matter that will need to be considered through the development management process, guided by national policy and guidance and the flood risk policies in the development plan. However, the whole of the built-up area of Stoke Canon, which is listed as a service village where limited development to meet local need would normally be acceptable, is located in flood zones 2 and 3. A settlement boundary has not been included in the Regulation 19 plan because the whole of the settlement is at flood risk.

[34] Browse meetings - Strategic Planning Committee - East Devon
[35] Paragraph 5.2 of 3. Local Plan allocation site selections.pdf (eastdevon.gov.uk)
[36] Agenda for Strategic Planning Committee on Wednesday, 11th December, 2024, 9.00 am - East Devon
[37] Sites not specifically identified in the development plan
[38] ksd-010-settlement-boundaries.pdf

7 The sequential testing of allocations

7.1 The NPPF requires local plans to apply a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property by applying the sequential test and then, if necessary, the exception test[39]. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied[40].

7.2 The SFRA level 1 includes Appendix O[41] that sets out how the sequential test should take account of changes to the NPPF in July 2021 and the revisions to the accompanying Planning Practice Guidance (NPG) in August 2022. Previously, only river and sea risk needed to be taken into account in the sequential test, but the requirement changed so that all sources of flood risk needed to be taken into account, but without details of how this should be achieved (in the absence of the flood zones defined for river and sea flood risk in relation to other sources of flooding). The approach set out in Appendix O of the SFRA L1 has been agreed with both the Environment Agency and Devon County Council, as Lead Local Flood Authority. Updates to the NPG to reflect further changes to the sequential test made in the December 2024 NPPF were published in September 2025, but do not materially affect work done in relation to the local plan allocations.

7.3 The site screening of allocations undertaken by JBA (as referenced in paragraphs 5.1 to 5.4 of this report shows how flood risk has been considered through site allocations. It has identified sites where further understanding of flood risk is required so that an informed sequential test can be applied.

7.4 The general advice[42] is that the sequential test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk. However, the local plan seeks to guide different levels of development to tiers of settlements in accordance with the spatial strategy as explained in paragraph 6.2 of this report. This means that the overall requirement to meet the development levels set out in the plan is mitigated by the plan objective to locate these appropriately in accordance with the spatial strategy. In this context, the NPPF requirement to direct development to 'reasonably available' sites at less risk of flooding should reflect the spatial strategy of the overall plan. The starting point for sequential testing of proposed housing and mixed-use allocations has therefore been to consider whether there are reasonably available sites around the relevant settlement. If there are not, the sequential test is met. It is acknowledged that this is a more restrictive test than would be relevant to a 'windfall site', but it is justified by the importance of being able to deliver the spatial strategy on which the local plan is based. It is also compatible with the approach taken to

[39] Paragraph 167 of the December 2023 NPPF
[40] Paragraph 169 of the December 2023 NPPF
[41] IEZ-JBAU-XX-XX-RP-HM-0006-S3-P01-Sequential_Test_Methodology
[42] Flood risk and coastal change - GOV.UK (www.gov.uk)

consideration of exceptional circumstances in relation to major development in the context of a national landscape[43].

7.5 The consideration of sites in relation to a specific settlement has formed 'stage 1' of the sequential testing process for site allocations in the local plan. If there are not considered to be reasonably available sites that are well related to the settlement to meet the growth levels appropriate for that settlement, the sequential test is considered to have been met. In theory, if this test had been failed, there would be a 'stage 2' test to consider the overall availability of reasonable sites in the East Devon as a whole. However, in practice all of the sites considered met the sequential test at stage 1, so a stage 2 test was not necessary. The sequential test applied for mixed use and housing local plan allocations can therefore be summarises as: "Are there, or are there not, any reasonably available sites that are well related to the relevant settlement that are in areas with a lower probability of flooding that would be appropriate to accommodate the type of development or land use proposed (taking into account wider sustainable development objectives)?". If the answer is no the sequential test is met.

7.6 The sites sequentially tested for mixed use and housing are in Axminster (Axmi_07, Axmi_17 and GH/ED/80a), Colyton (Coly_06); Exmouth (Exmo_50); Kilmington (Kilm_10); Lympstone (GH/ED/72a); Musbury (Musb_01a); Ottery St. Mary (Otry_10 and GH/ED/27); and Whimple (Whim_11 and Whim_08a). Although there is an element of flood risk on parts of all these sites, they have been considered as part of the plan making process for a number of reasons. All of the sites are sustainably located either within, or adjacent to a settlement where the strategy of the Local Plan is to direct housing growth. Sites Axmi_07, Exmo_50 and Musb_01a are within existing settlement boundaries and offer regeneration opportunities. The SFRA L2 concludes that, subject to a detailed flood risk assessment being undertaken at the planning application stage and the areas of the sites at higher risk not being developed, the allocation of all of these sites would be in accordance with the national approach of guiding development to areas at least risk of flooding. The results of the sequential testing of these sites are included in Appendices H to Q and W and X.

7.7 In terms of the proposed **employment allocations**, the local plan strategy is to focus new sites in the west of the district, with allocations in the tier 1 and 2 towns to improve settlement containment and to provide small scale employment opportunities in the tier 3 and 4 settlements. The 5 employment sites concerned are located in the west of the district: Clge_23a; Clge_25a; Chlo_09; Farr_01 and GH/ED/43. The key question considered in the sequential test for employment allocations is therefore "Are there, or are there not, any reasonably available sites in the western part of East Devon that are in areas with a lower probability of flooding that would be appropriate to accommodate the proposed strategic employment uses (taking into account wider sustainable development objectives)?". The results of the sequential testing of these sites are included in Appendices R to V.

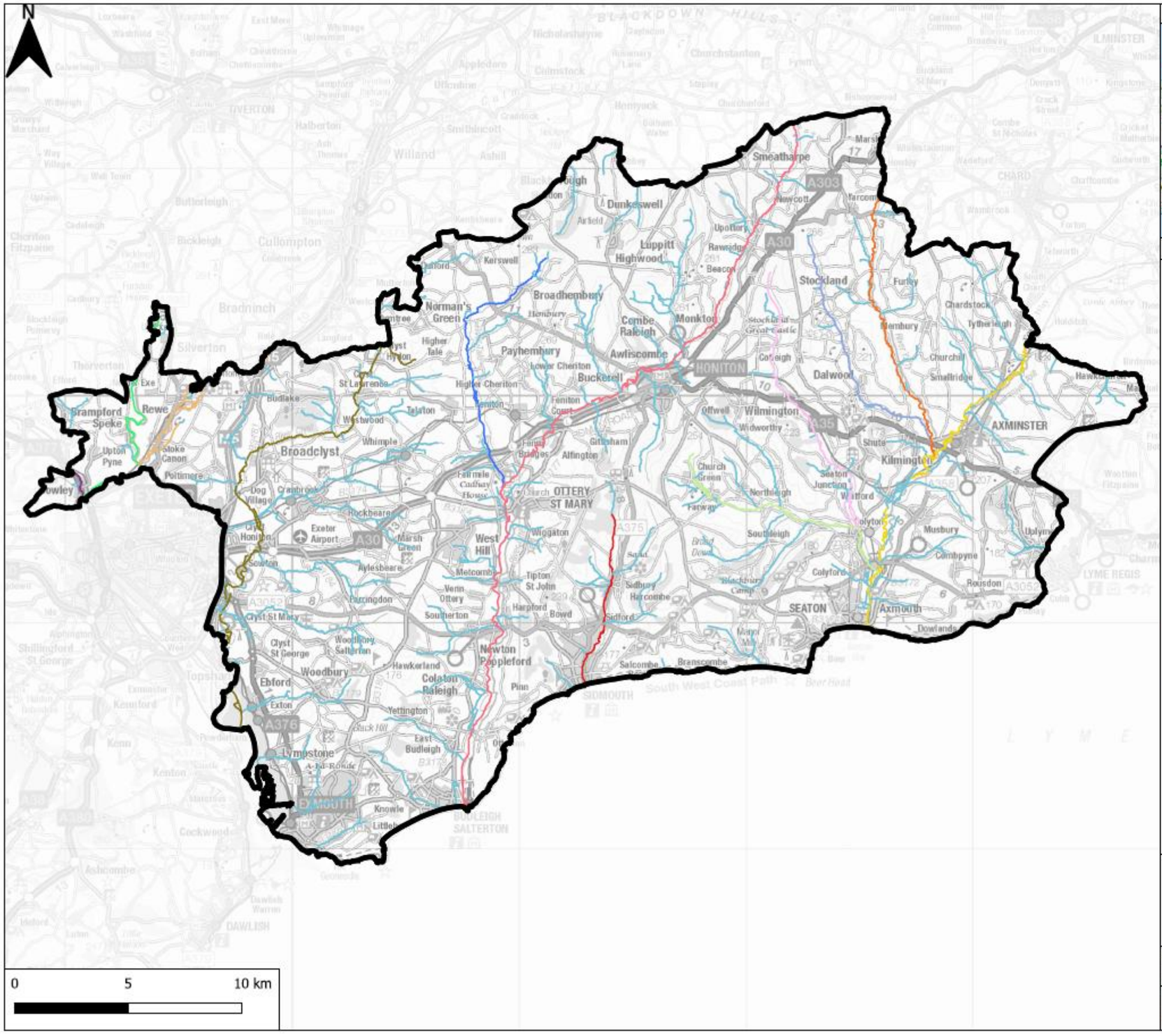
[43] Chapter 5 of sal-049-major-development-in-national-landscapes.pdf

7.8 The NPPF states that “If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed”. The exception test should only be applied if the sequential test has been passed. To pass the exception test, it is necessary to demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Evidence for part b of the test should be provided in the SFRA.

7.9 The SFRA level 2 showed that the exception test would be required for three sites: Axmi_07; Coly_06 and Mus_01a. The exception test is met in each case as detailed in the relevant appendix.

8 Appendix A Watercourses in East Devon

See iez-jbau-xx-xx-mp-hm-0002-a1-c01-appendix_b_watercourses.pdf for higher resolution image.



Location Plan

Legend

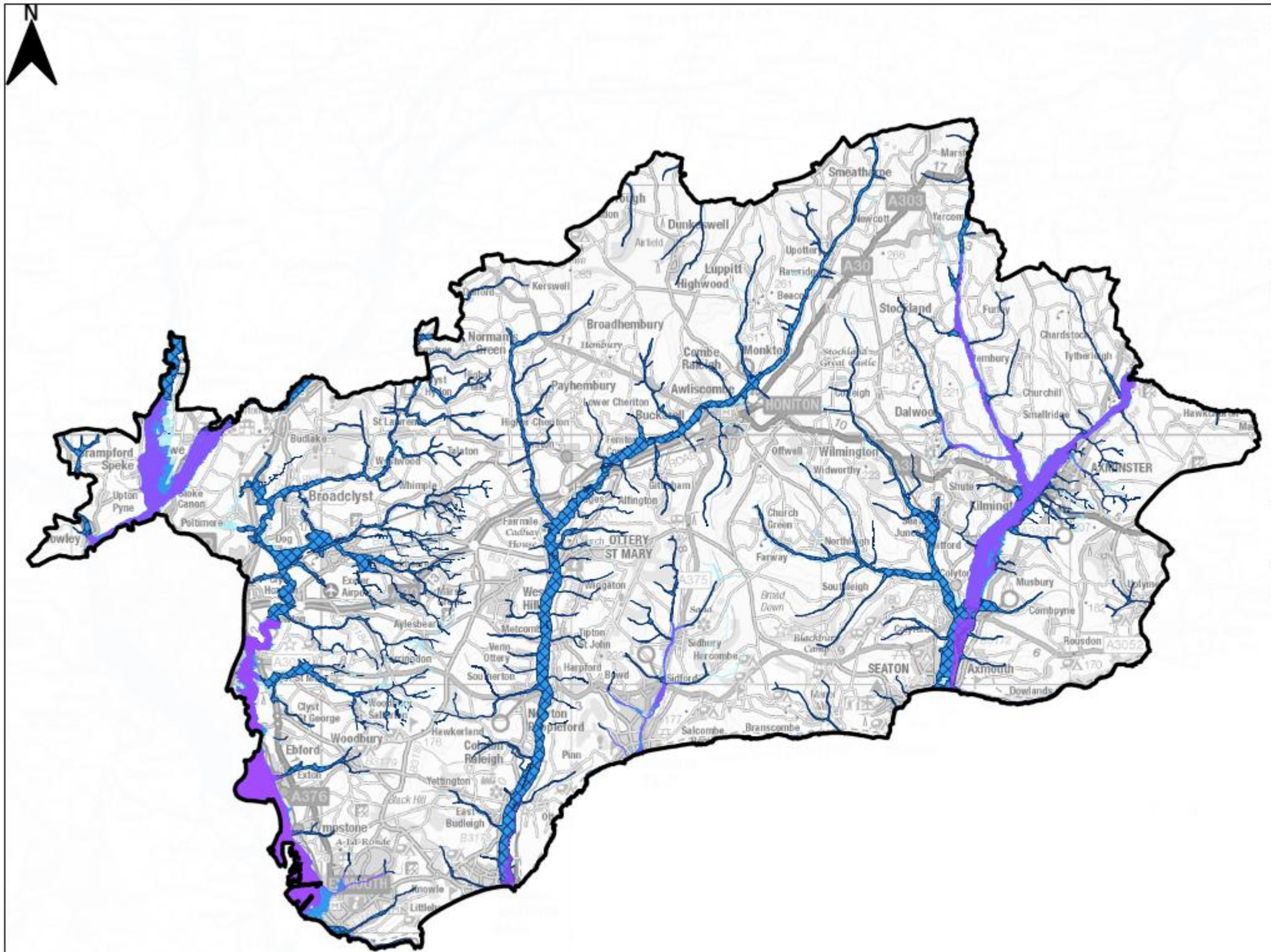
- East Devon District
- Ordinary Watercourses

Main Rivers

- River Axe
- River Clyst
- River Coly
- River Yarty
- River Lim
- River Creedy
- River Culm
- River Exe
- River Otter
- River Sid
- Corry Brook
- River Tale
- Umborne Brook

9 Appendix B Flood zones

See iez-jbau-xx-xx-mp-hm-0003-a1-c01-appendix_c_flood_zones-optimised.pdf for higher resolution image



0 5 10 km

Location Plan

Legend

- East Devon District
- Flood Zone 3b - 1 in 30 year (3.3% AEP) defended (or 1 in 50 year (2% AEP) as proxy) from detailed modelling
- Flood Zone 3b - Flood Zone 3a as proxy
- Flood Zone 3a
- Flood Zone 2

East Devon District Council
Level 1 SFRA - Appendix C
Flood Zones

Notes

Flood Zone 1: Comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1% AEP).

Flood Zone 2: This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (0.1% - 1% AEP) or between 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.1% - 0.5% AEP) in any year.

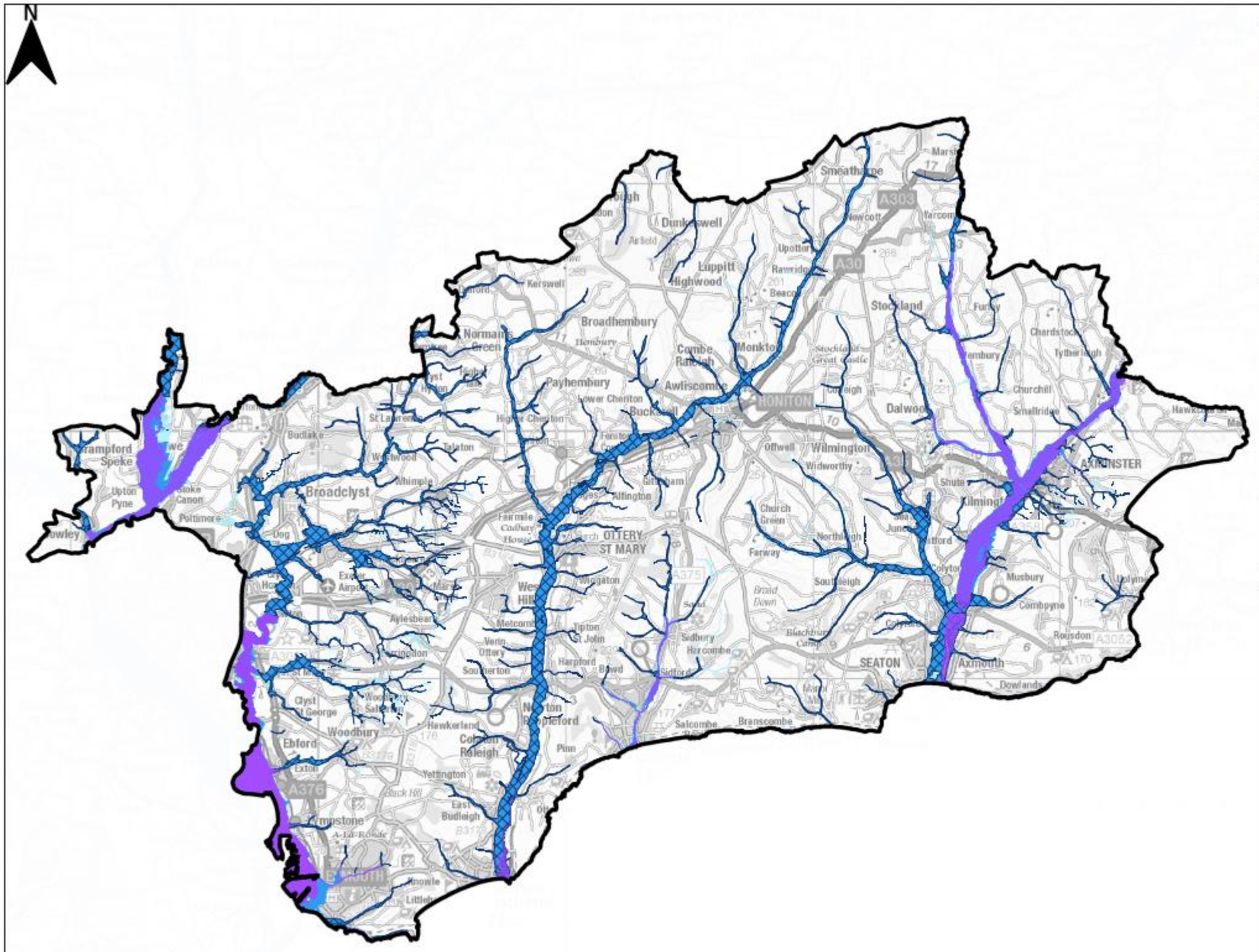
Flood Zone 3a: This zone comprises land assessed as having greater a 1 in 100 annual probability of river flooding (>1% AEP) or greater than 1 in 200 annual probability of sea flooding (>0.5% AEP) in any year.

Flood Zone 3b: This zone comprises land where water has to flow or be stored in times of flood (the functional floodplain).The SFRA identified this Flood Zone as land which would flood with an annual probability of 1 in 30 years (3.3% AEP), where detailed modelling exists. Where the 1 in 30 year outputs are not available, the precautionary approach has been taken, and surrogate return periods have been used (1 in 50 years (2% AEP)), if available. Where this was not available, then Flood Zone 3a has been used.

If a proposed developement shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site-specific FRA to define and confirm the extent of Flood Zone 3b. The Environment Agency regular reviews its hydrology, hydraulic modelling and flood risk mapping, and it is important that they are approached to determine whether updated (more accurate) information is available prior to commencing a site-specific FRA.

10 Appendix C Surface water

See E- RoFSW for higher resolution image



Location Plan

Legend

- East Devon District
- Flood Zone 3b - 1 in 30 year (3.3% AEP) defended (or 1 in 50 year (2% AEP) as proxy) from detailed modelling
- Flood Zone 3b - Flood Zone 3a as proxy
- Flood Zone 3a
- Flood Zone 2

East Devon District Council
Level 1 SFRA - Appendix C
Flood Zones

Notes

Flood Zone 1: Comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1% AEP).

Flood Zone 2: This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (0.1% - 1% AEP) or between 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.1% - 0.5% AEP) in any year.

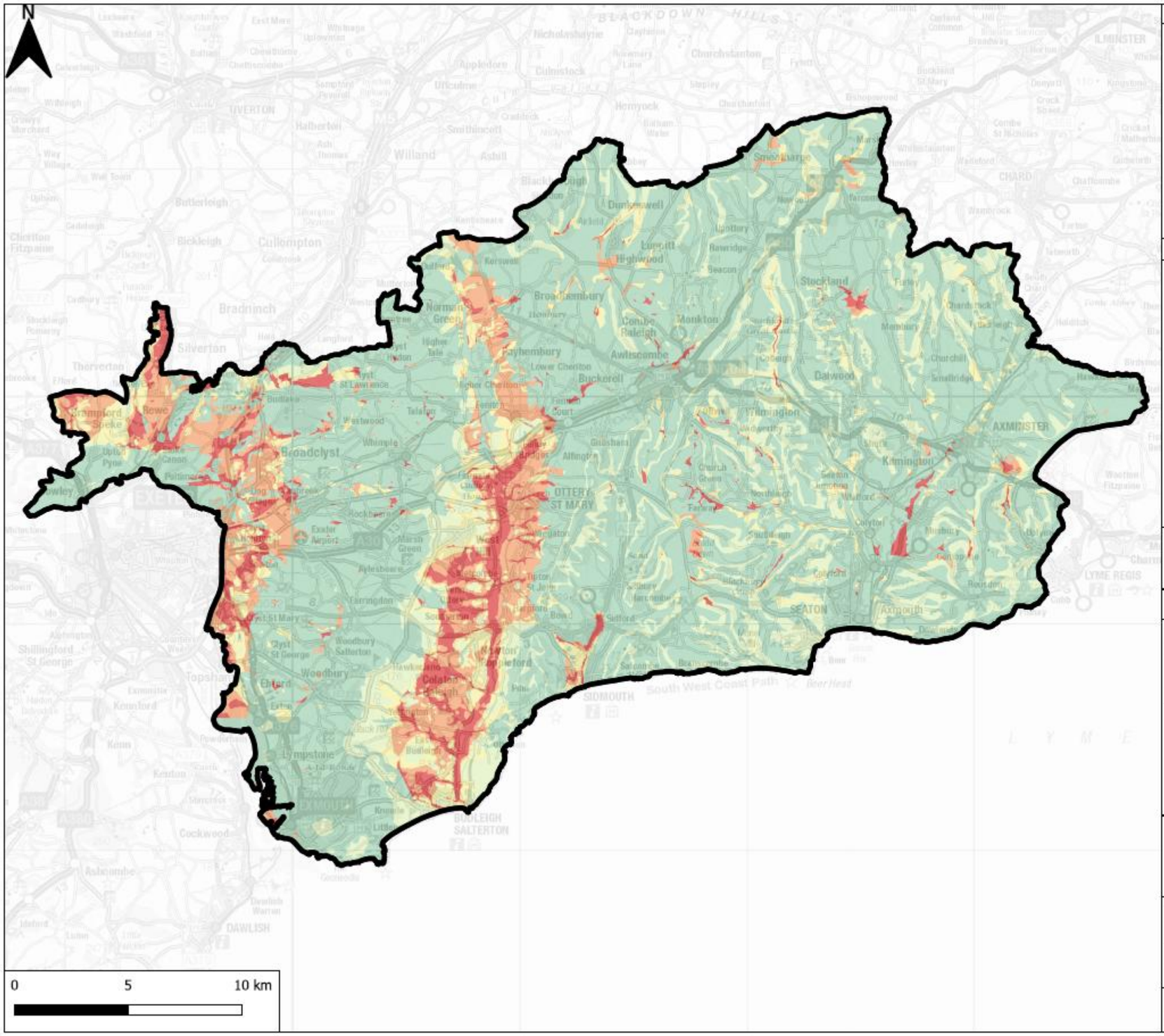
Flood Zone 3a: This zone comprises land assessed as having greater a 1 in 100 annual probability of river flooding (>1% AEP) or greater than 1 in 200 annual probability of sea flooding (>0.5% AEP) in any year.

Flood Zone 3b: This zone comprises land where water has to flow or be stored in times of flood (the functional floodplain).The SFRA identified this Flood Zone as land which would flood with an annual probability of 1 in 30 years (3.3% AEP), where detailed modelling exists. Where the 1 in 30 year outputs are not available, the precautionary approach has been taken, and surrogate return periods have been used (1 in 50 years (2% AEP)), if available. Where this was not available, then Flood Zone 3a has been used.

If a proposed developement shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site-specific FRA to define and confirm the extent of Flood Zone 3b. The Environment Agency regular reviews its hydrology, hydraulic modelling and flood risk mapping, and it is important that they are approached to determine whether updated (more accurate) information is available prior to commencing a site-specific FRA.

11 Appendix D Groundwater levels

See iez-jbau-xx-xx-mp-hm-0012-a1-c01-appendix_g_groundwater.pdf for a higher resolution image



Location Plan

Legend

East Devon District

Groundwater Levels

Groundwater levels are either at or very near (within 0.025m of) the ground surface.

Groundwater levels are between 0.025m and 0.5m below the ground surface.

Groundwater levels are between 0.5m and 5m below the ground surface.

Groundwater levels are at least 5m below the ground surface.

Low risk.

East Devon District Council
Level 1 SFRA - Appendix G
Groundwater Flooding

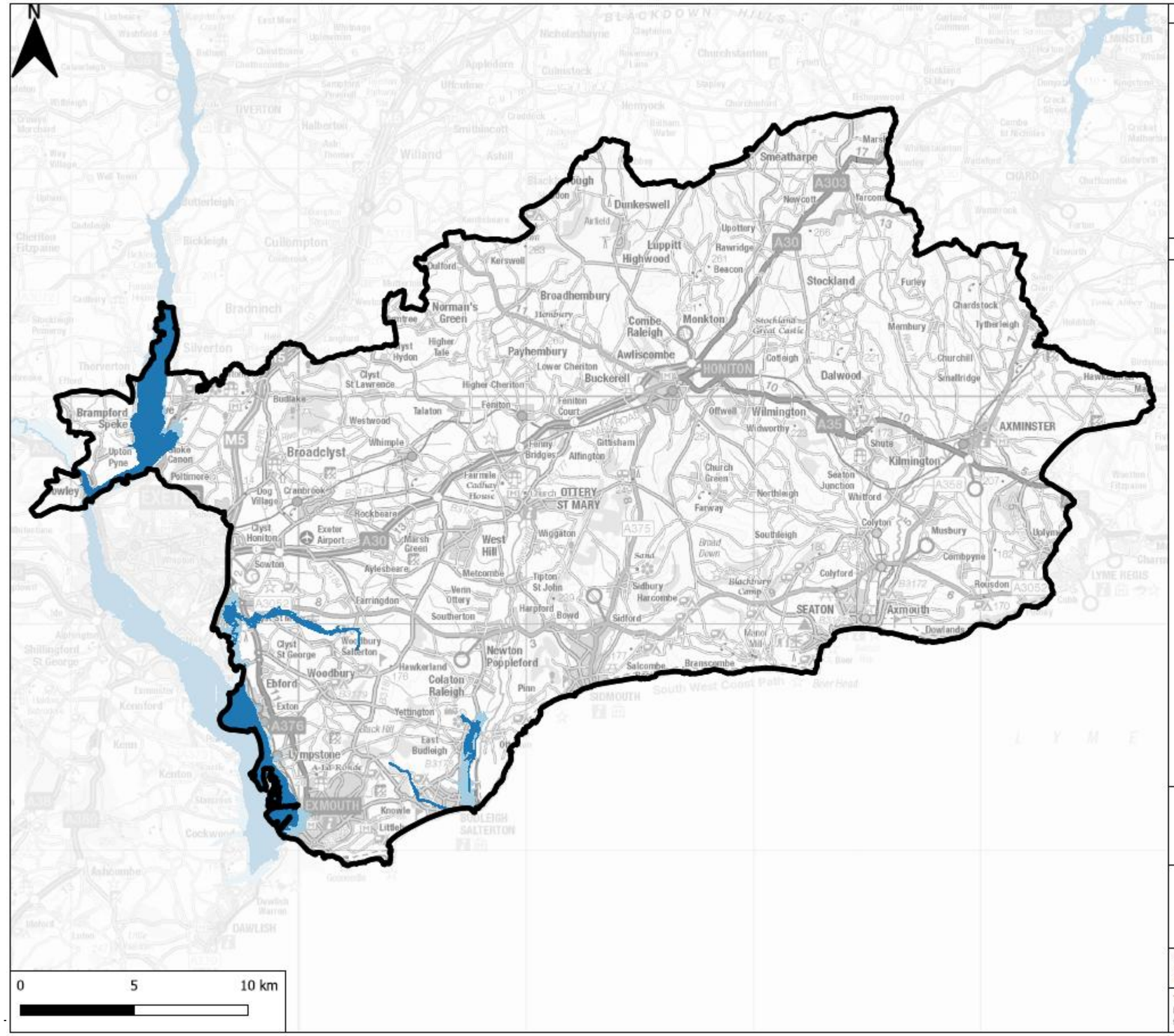
Notes

It is important to note that the modelled groundwater levels are not predictions of typical groundwater levels. Rather they are flood levels i.e. groundwater levels that might be expected after a winter recharge season with 1% AEP, so would represent an extreme scenario. The map also shows where groundwater is predicted to emerge, but it does not show where the flooding is likely to occur, or to what depths, velocity or hazard.

It should be noted that as the JBA Groundwater Flood Map is based on national modelling it should only be used for general broad-scale assessment of the groundwater flood hazard in an area and it is not explicitly designed for the assessment of flood hazard at the scale of a single property. In high-risk areas a site-specific risk assessment for groundwater flooding is recommended to fully inform the likelihood of flooding. Devon County Council should be consulted at the earliest opportunity to understand local groundwater issues around development sites and developers should prioritise groundwater monitoring to further understand local impacts.

12 Appendix E Reservoir

See iez-jbau-xx-xx-mp-hm-0013-a1-c01-appendix_h_reservoir.pdf for image with higher resolution



Location Plan

Legend

- East Devon District
- Environment Agency's Reservoir Flood Extents Dry Day
- Environment Agency's Reservoir Flood Extents Wet Day

East Devon District Council
Level 1 SFRA - Appendix H
Reservoir Inundation

JBA consulting

13 Appendix F Sites where Level 2 SFRA undertaken 2025

Site and local plan policy reference

Clge_25a - Strategic Policy WS15: Employment land at Darts Farm

Clho_09 - Strategic Policy WS07: Employment land north of the airport, adjoining Treasbeare

GH/ED/72a - GH/ED/72a - Land at Meeting Lane, Lympstone

Whim_08 - Land west of Bramley Gardens (Whim_08a)

14 Appendix G Summary of sequential and exceptions test

Reference	Location	Development	Sequential test	Exceptions test
Axmi_07	Axminster	Housing/Employment	Passed	Passed at local plan allocation stage
GH/ED/80/a	Axminster	Housing/Community	Passed	Not required
Axmi_17	Axminster	Housing	Passed	Not required
Coly_06	Colyton	Housing	Passed	Passed at local plan allocation stage
Exmo_50	Exmouth	Housing Police/ Station	Passed	Not required
Kilm_10	Kilmington	Housing	Passed	Not required
Mus_01a	Musbury	Housing/Employment	Passed	Passed at local plan allocation stage
Otry_10	Ottery St. Mary	Housing	Passed	Not required
GH/ED/27	Ottery St. Mary	Housing	Passed	Not required
Whim_11	Whimple	Housing	Passed	Not required
GH/ED/43	West of East Devon	Employment	Passed	Not required
Clge_23a	West of East Devon	Employment	Passed	Not required
Farr_01	West of East Devon	Employment	Passed	Not required
Clge_25a	West of East Devon	Employment	Passed	Not required
Chlo_09	West of East Devon	Employment	Passed	Not required
GH/ED/72a	Lympstone	Housing	Passed	Not required
Whim_08a	Whimple	Housing	Passed	Not required
Clge_25a	West of East Devon	Employment	Passed	Not required
Clho_09	West of East Devon	Employment	Passed	Not required

Reference	Location	Development	Sequential test	Exceptions test
GH/ED/72a	Lympstone	Housing	Passed	Not required
Whim_08a	Whimple	Housing	Passed	Not required

15 Appendix H Sequential and Exception Test Land at Axminster Carpets (Axmi_07)

Summary

Sequential test – passed.

Exception test – the SFRA L2 has demonstrated that it would be possible to pass part B of the exception test, subject to detailed layout of the site. This will need to be re-assessed at planning application stage.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[44], which should be referred to for a fuller picture of flood risk on the site, together with the Flood Estimation Report[45] and site modelling[46].

The SFRA L2 concludes that the northern portion of the site is generally identified to be at low risk of flooding. It is not shown to be at risk of fluvial flooding within the detailed modelling, but that there is some, localised surface water flooding. The western and southern portions of the site are shown to be at high risk of flooding. Development would likely be inappropriate in these areas and more vulnerable development would not be permitted.

Redevelopment of the site could involve exposing the watercourse that is currently in a culvert and revising ground levels to provide a dedicated green infrastructure corridor with the aim of providing certainty in terms of developing the remainder of the site. Parts of the site currently at risk of flooding could therefore be developed, whilst providing a development that would be safe in itself but that could also reduce overall flood risk.

Fluvial - Flood Map for Planning

The site is partially located within Flood Zone 2 and 3 to the west/south and east of the site, due to a watercourse crossing from east to west. The remainder of the site in the north is located within Flood Zone 1.

Fluvial - Axminster Carpets Flood Risk Modelling

The site is shown to flood across the south and western portions of the site in all three events, with an increasing southern extent through AEP events. Flood coverage increases from 26% within the 3.3% AEP event, to 30% within the 1% AEP and 32% within the 0.1% AEP event. The mean depth and hazard on site during the 0.1% AEP event is shown to be 0.22m and 0.84 rated as a ‘danger to some’. The average velocity on site is shown to be 0.2m/s, with a maximum of 3.67m/s. The modelling shows a decrease in flooding within the eastern portion of the site in comparison to the Flood Map for Planning. Within the model flood event it is evident that during the 1% AEP event the onset of flooding is relatively rapid with the maximum flood depth seen at 4 hours, with the site flooding first flooding at 2.5 hours. The majority of flooding on site is then shown to have subsided by 8 hours

Fluvial plus climate change

The Axminster Carpets Flood Risk modelling developed by JBA Consulting in 2024 for this Level 2 SFRA assessment for East Devon District Council, was also run to include the 46% and 61% climate change allowances. The site is shown to flood in all six events along the west and southern portions of the site. The maximum extent of flooding is within the 0.1% AEP plus 61% climate change covering 35% of the site, with an average depth of 0.3m. The mean velocity during this event is 0.26m/s, with a maximum of 4.54m/s. The average hazard on site is shown to be 1.07, which is stated to be a ‘danger to some’. It should be noted the even during the 0.1% AEP plus 61% climate change event there is a significant decrease in the flood extent in comparison to the Flood Map for Planning Flood Zones across the eastern half of the site.

Surface water

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[44] ccf-003-appendix-a1-axmi_07-site-report.pdf
[45] JBA Consulting Report Template
[46] ccf-003-appendix-b1-xminster_hydraulic_modelling_report.pdf

The site is shown to flood in all three events, with up to 31% coverage in the 0.1% AEP event. The flow path within the 3.3% AEP event flows from east to west along the culvert location, with localised flooding to the west, due to a slight depression within the topography. The flooding extent increases across the western portion of the site, with localised flooding to the north in the 0.1% AEP event. The mean depth and hazard in the 0.1% AEP event are 0.63m and 1.34 (a 'danger to most') respectively. The average velocity on site is shown to be 0.45m/s, with a maximum of 3.48m/s.

Surface water plus climate change

The site is shown to flood across the south and west of the site within all three events, with increasing extent to the east and north of the site within the 0.1% AEP plus climate change event. With the 0.1% AEP plus climate change event 50% of the site is shown to flood with an average depth of 0.7m. The mean velocity is shown to be 0.5m/s, with a maximum of 4.53m/s. The average hazard rating is 1.52, classed as a 'danger to most'.

Groundwater

During a 1% AEP groundwater flood event, groundwater levels are predominantly shown to be 'low risk', however levels are shown to be at or very near (within 0.025m of) the ground surface along the culvert's location across the site from east to west. Flow paths would be expected to follow the topography of the site and be similar to surface water flow paths. The risk of groundwater flooding will require further consideration in a site-specific flood risk assessment.

Key points and constraints from SFRA Level 2

Access and egress affected and should be assessed within a site-specific FRA.

31% located within surface water flood risk during the 0.1% AEP extent and 50% within 0.1% AEP plus 65% climate change.

32% located within the modelled fluvial flood risk during the 0.1% AEP extent and 35% within 0.1% AEP plus 65% climate change.

The site is partially located within Flood Zone 2 and 3.

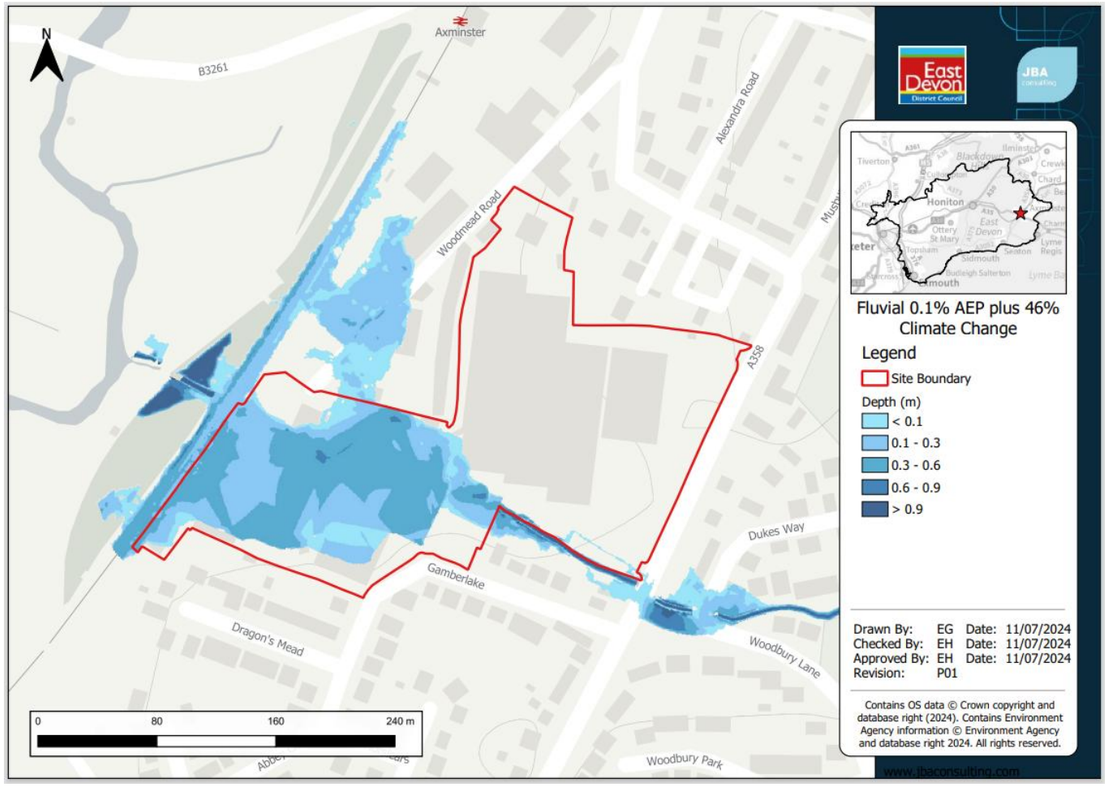
The site has one identified sewer event in 2012.

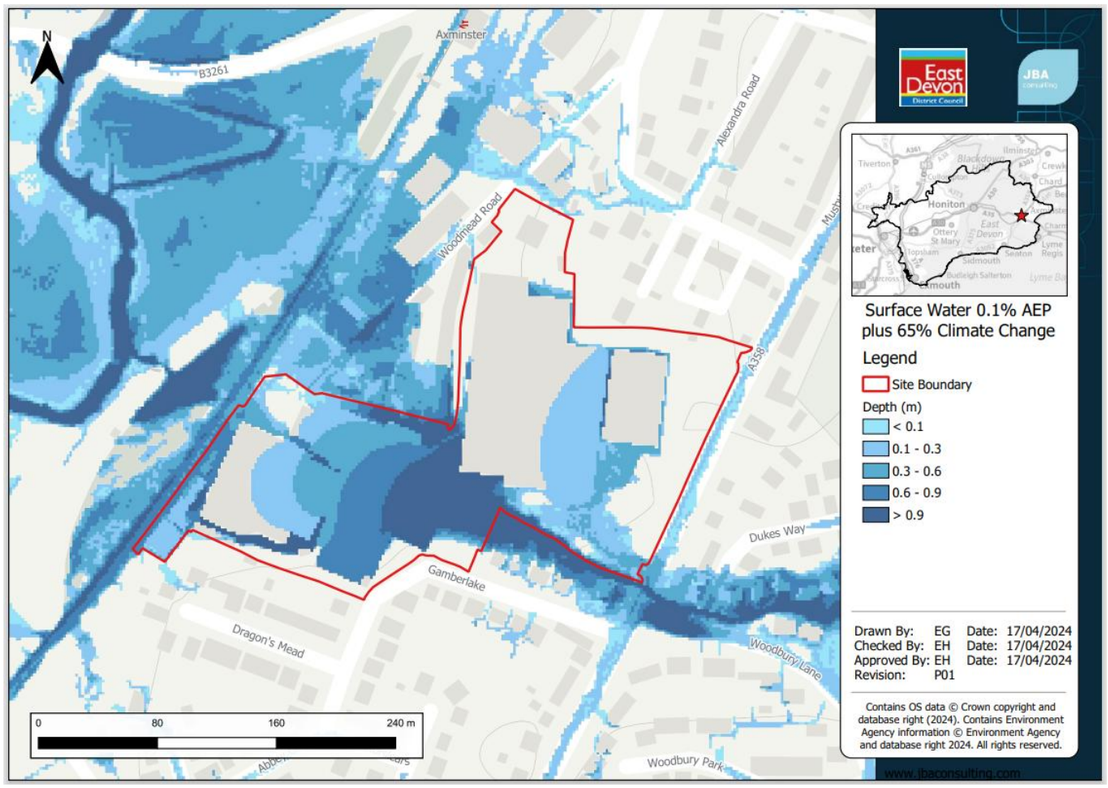
Local Plan Policy

Strategic Policy SD02: Axminster and its development allocations – Axmi_07 Land at Axminster Carpets.

This land is allocated for mixed-use redevelopment to retain the existing employment use and accommodate 50 dwellings plus additional employment uses. This allocation will need to be supported by further flood risk assessment and a comprehensive masterplan to secure pedestrian, environmental and other improvements. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and exception test has been undertaken as part of the local plan. Development should be appropriately designed to accommodate pedestrian/cycle access and through routes.

Selected Maps[47]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Axminster with a lower probability of flooding, taking into account wider sustainable development objectives.

Of the 16 reasonable alternative sites identified for development at Axminster in the Sustainability Appraisal, only one was not allocated. The Co-operative Food, West Street (Axmi_16) was rejected as the loss of a supermarket in this location (adjacent to the town centre), would harm the vitality and viability of the town centre.

Large parts of Axmi_07 are at low risk of flooding (flood zone 1), and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

The site comprises a group of buildings with associated hard standings in industrial use. It is in a highly sustainable location within the town and close to the railway station. The efficient use of previously developed land is a key approach in strategic policy and particularly important in East Devon, where there is a limited supply of brownfield sites and much of the land is in a national landscape, or has other environmental constraints.

[47] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Development on the site would bring wider sustainable development benefits, including environmental improvements and better active travel links across the site. The SFRA L2 advises that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could also provide wider sustainability benefits to the site and surrounding area. Additionally, the SFRA L2 highlights the opportunity to 'daylight' a watercourse that is currently in a culvert and to reduce overall flood risk.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the exception test is needed for this site.

In order to pass Part A of the exception test, it must be demonstrated that the development would "provide wider sustainability benefits to the community that outweigh the flood risk"[48]. This requirement is met for the reasons set out in relation to the sequential test above.

To pass 'Part B' of the exception test it must be shown that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The SFRA L2 has demonstrated that it would be possible to meet this requirement subject to detailed layout of the site. In terms of the local plan allocation, this requirement has been met, but, until a detailed planning application and accompanying FRA have been submitted, it is not possible to determine whether this requirement will be met. It will therefore be necessary to reconsider the exception test at the planning application stage.

[48] NPPF, paragraph 169

16 Appendix I Sequential and Exception Test - Land at Prestaller Farm, Beavor Lane, Axminster (GH/ED/80a)

Summary

Sequential test – passed.

Exception test – not required subject to there being no development in the areas of the site at risk of flooding.

Description of flood risk.

The SFRA L2 concludes that the site is generally identified to be at low risk of flooding. This description is taken from the relevant detailed site summary sheet[49], which should be referred to for a fuller picture of flood risk on the site.

Fluvial
The flood map for planning shows the site to be partially located within Flood Zone 2 and 3 (to the north of the site and with a tributary crossing from south to north). The remainder (the majority) of the site is located within Flood Zone 1. River Axe Flood Risk Modelling shows flooding along the north/eastern boundary. There is a significant difference in flood extent between the River Axe modelling and the Flood Map for Planning so detailed flood modelling should be undertaken for this site prior to any development to accurately define the Flood Zone 3b extent. In the absence of detailed modelling, Flood Zone 3 should be used as a proxy for Flood Zone 3b.

Fluvial plus climate change
The site is shown to flood in all six events along the northern and eastern boundary. The maximum extent of flooding is within the 0.1% AEP plus 61% climate change covering 9% of the site, with an average depth of 0.75m. The mean velocity during this event is 1.7m/s, with a maximum of 4.88m/s. The average hazard on site is shown to be 2.65, which is stated to be a ‘danger to all’, however due to the low proportion of the site flooding, this should not be a concern across the majority of the site.

Surface water
The site is shown to be at risk of flooding along the northern and eastern boundary in all three modelled events, with flow paths from the south to the north and east in the 0.1% AEP event. The mean depth within the 0.1% AEP event is shown to be 0.33m, with a mean velocity of 1.58m/s. The average hazard on site is 1.5, which is stated to be a ‘danger to most’.

Surface water plus climate change
The site is shown to be at risk of flooding in all three scenarios along the northern and eastern boundary, and along the watercourse on site with an average mean depth in the 0.1% AEP plus 65% climate change of 0.45m. The average velocity is shown to be 2.05m/s, with a maximum of 5.52m/s. The average hazard rating is shown to be a ‘danger to all’ at 2.14, however this only relates to a small proportion of the site, as only 22% of the site is at risk of flooding in the 0.1% AEP plus climate change event.

Groundwater

Groundwater levels on site are predominantly at ‘low risk’, with a small area to the north of the site either at or very near (within 0.025m of) the ground surface. In the centre of the site two areas are shown to have levels between 0.5m and 5m below the ground surface, and at least 5m below the grounds surface.

[49] ccf-003-appendix-a1-gh-ed-80a-site-report.pdf

Key points and constraints from SFRA Level 2

Access and egress is likely to be possible with depths of up to 0.21m along Sector Lane in the 1% AEP plus climate change surface water modelling.

8% located within fluvial flood risk during the 0.1% AEP extent, and 9% within 0.1% AEP plus 65% climate change.

14% located within surface water flood risk during the 0.1% AEP extent and 22% within 0.1% AEP plus 65% climate change.

The site is partially located within Flood Zone 2 and 3.

No identified sewer, reservoir or tidal flood risk, and is not located within a Groundwater SPZ and NVZ.

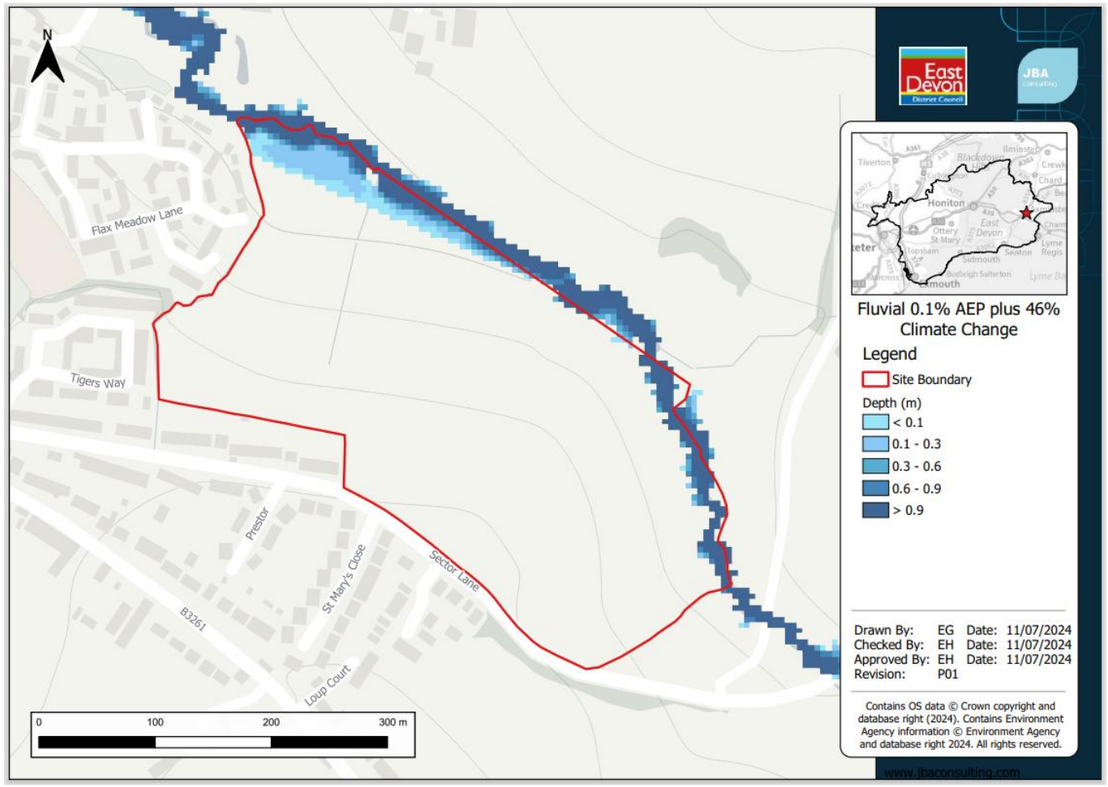
The site is located within a CDA and an area of flood alerts.

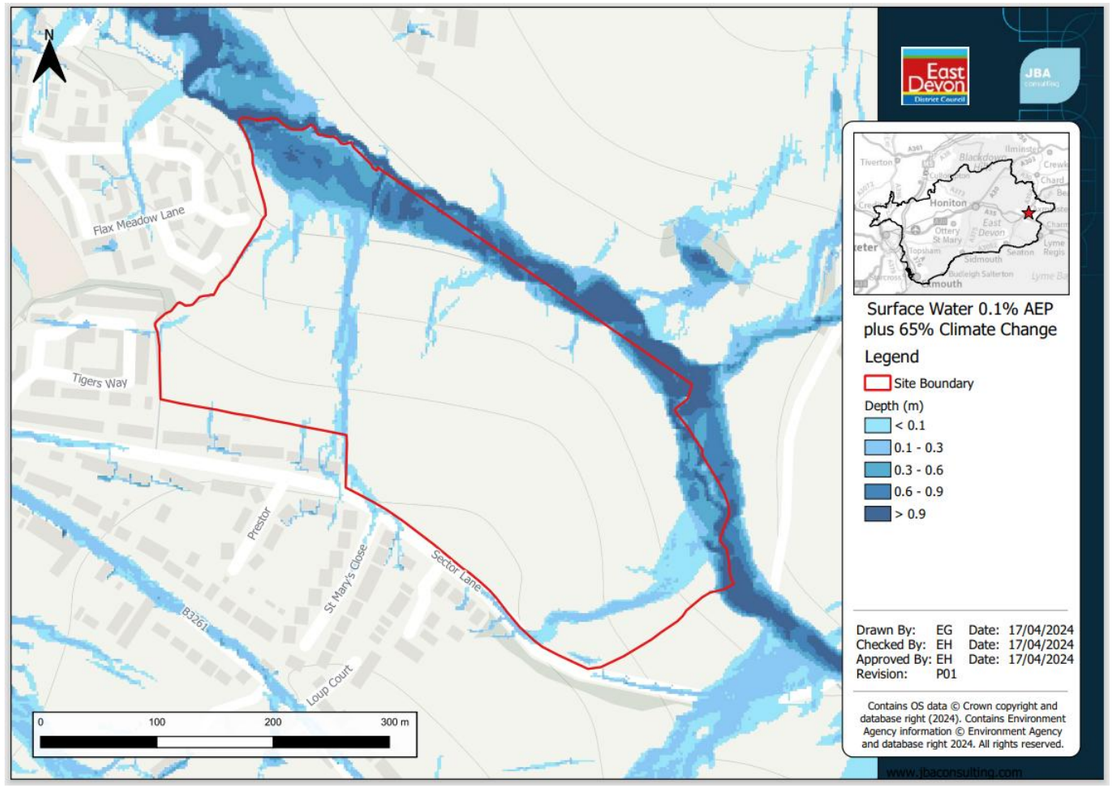
Local Plan Policy

Strategic Policy SD02: Axminster and its development allocations Prestaller Farm, Beavor Lane (GH/ED/80a)

This site is allocated for 225 dwellings and a community hub to the south of the Mill Brook. The community space should provide opportunities for a workspace, café/shop and meeting space. To the north of Mill Brook land has the potential for use as a multi-functional public open and natural space as well as for habitat mitigation purposes. Where this is required to meet the needs of the development provision will be required. Vehicular access to the site shall be from the allocated land to the south (Axmi_22) unless otherwise agreed. Development must incorporate a site road that is of a standard and is appropriately located so that it, and through potential future extension of the road, can form a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. Sector Lane should be reconfigured and harmonised into future proposals. Public Rights of Way enhancements should also be explored. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Selected Maps[50]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Axminster with a lower probability of flooding, taking into account wider sustainable development objectives.

Of the 16 reasonable alternative sites identified for development at Axminster in the Sustainability Appraisal, only one was not allocated. The Co-operative Food, West Street (Axmi_16) was rejected as the loss of a supermarket in this location (adjacent to the town centre), would harm the vitality and viability of the town centre.

Large parts of the site are at low risk of flooding (flood zone 1), and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

[50] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Exception test

The SFRA L2 advises that the Exception Test is not required for this site, providing development is outside of the areas at risk. Should development be proposed within Flood Zone 2 or 3, the exception test will be required and detailed flood modelling should be undertaken during a site-specific Flood Risk Assessment.

17 Appendix J Sequential and Exception Test - Millwey, Chard Road, Axminster (Axmi_17)

Summary

Sequential test – passed.

Exception test – not required subject to there being no development in the areas of the site at risk of flooding.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[51], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk of flooding.

Fluvial flooding

The site is partially located within Flood Zone 2 and 3 to the northwest of the site. The remainder (the majority) of the site is located within Flood Zone 1. There is no detailed modelling available for this site, so Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b.

Fluvial plus climate change

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset with a climate change allowance has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Surface water

The site is not shown to be at risk of flooding in the 3.3% AEP event. In the 1% AEP event a small flow path crosses the site from the south to the northwest, with an average depth of 0.08m. During the 0.1% AEP event the flow path extends south and widens increasing the average depth to 0.1m. The average hazard and velocity on site during the 0.1% AEP event are shown to be 0.66 ‘caution’ and 1.06m/s respectively.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with a flow path from south to north with localised flooding to the east, with predominantly shallow depths (averaging less than 0.12m). The maximum flood depth in the 0.1% AEP plus 65% climate change event is shown to be 0.36m in the northwestern corner of the site. The average velocity is shown to be no more than 1.15m/s, with a maximum velocity of 2.42m/s during the 0.1% AEP event with 65% climate change. The average hazard rating during the 0.1% AEP plus 65% climate change event is 0.7 and is therefore stated to be a ‘caution’.

Key points and constraints from SFRA Level 2

Available access and egress with depths up to 0.07m along the A358.

14% located within surface water flood risk during the 0.1% AEP extent and 34% within 0.1% AEP plus 65% climate change.

The site is partially located within Flood Zone 2 and 3.

No identified sewer, reservoir or tidal flood risk and is not located within an area of flood warning and alerts, Critical Drainage Area, Nitrate Vulnerable Zone or Groundwater Source Protection Zone.

The site is located within the Flood Map for Planning.

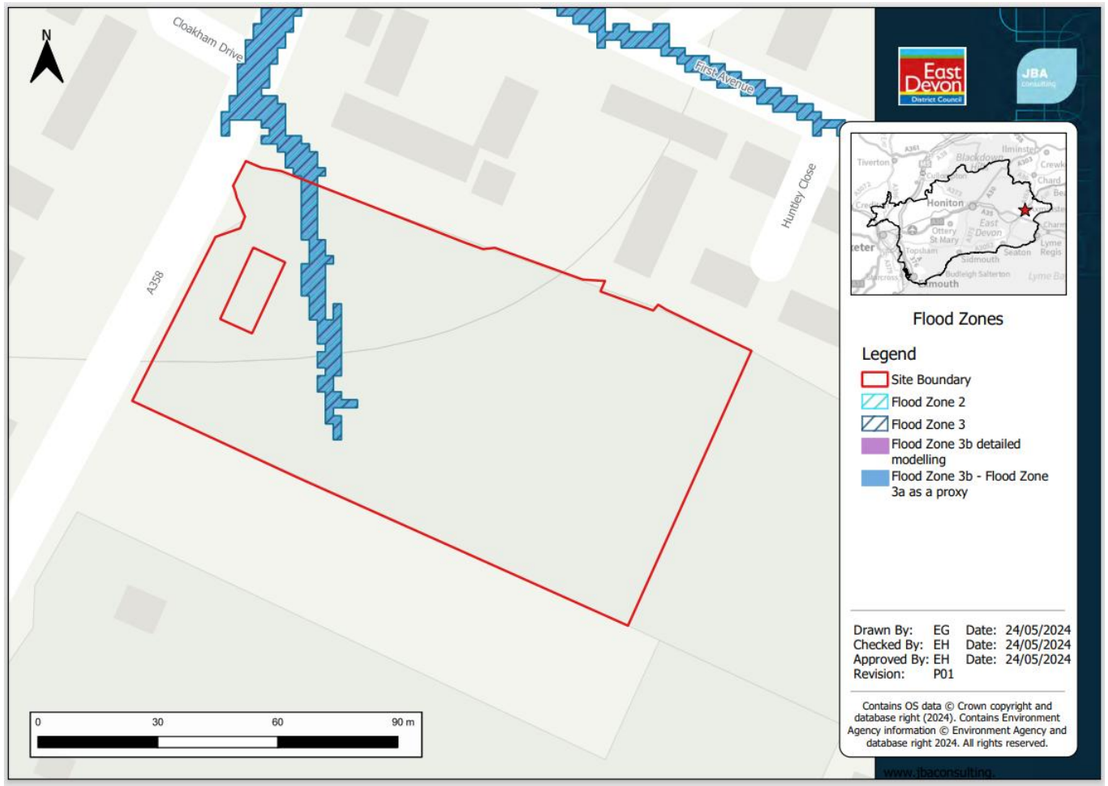
[51] ccf-003-appendix-a1-axmi_17-site-report.pdf

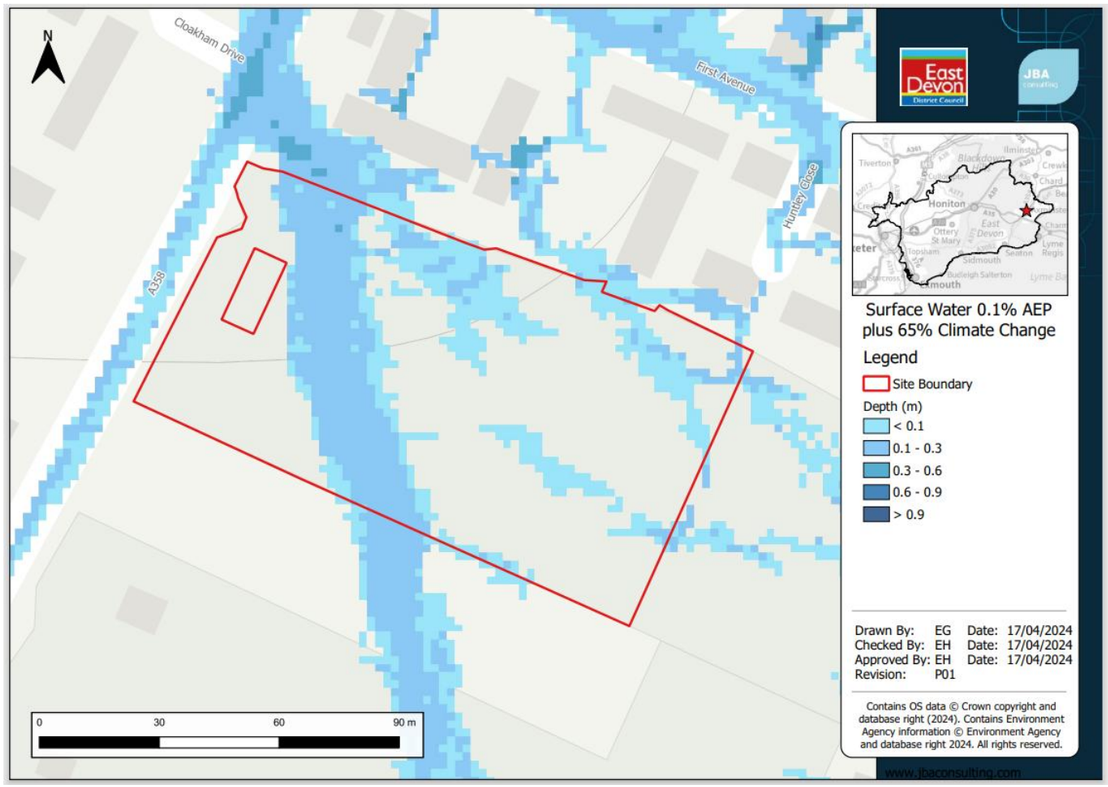
Local Plan Policy

Strategic Policy SD02: Axminster and its development allocations Land at Millwey, Chard Road, Axminster (Axmi_17)

This land is allocated for 19 dwellings. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. This site is an existing open space, with a previous use for sports pitches, the loss of which will need to be addressed through the development process. Careful consideration of access arrangements may require the relocation of the southbound bus stop.

Selected Maps[52]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Axminster with a lower probability of flooding, taking into account wider sustainable development objectives.

[52] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Of the 16 reasonable alternative sites identified for development at Axminster in the Sustainability Appraisal, only one was not allocated. The Co-operative Food, West Street (Axmi_16) was rejected as the loss of a supermarket in this location (adjacent to the town centre), would harm the vitality and viability of the town centre.

Large parts of the site are at low risk of flooding (flood zone 1), and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the Exception Test is not required for this site, providing development is outside of the areas at risk. Should development be proposed within Flood Zone 2 or 3, the exception test will be required and detailed flood modelling should be undertaken during a site-specific Flood Risk Assessment.

18 Appendix K Sequential and Exception Test – Land adjacent to the Peace Memorial Playing Fields, Colyton (Coly_06)

NB. The SFRA L2 assessment and the assessments in this paper, which is based on the SFRA, have been undertaken on site Coly_06 (which comprises Coly_06a and Coly_06b) because, while screening the revised boundary for the additional SFRA L2, the consultants noted that it is not best practice to clip a site boundary to the Flood Zones exactly. However, the allocation in the second Regulation 19 plan remains as Coly_06a.

Summary

Sequential test – passed.

Exception test – passed in principle, but will need to be re-assessed at planning application stage.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[53], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at medium risk of flooding.

Fluvial flooding

The site is almost completely located within Flood Zone 2, with the eastern half of the site located within Flood Zone 3. A small area to the west of the site is located within Flood Zone 1. However, the Flood Zone 2 extent on site is comprised of the National Generalised Fluvial Model and the Environment Agency's Historic Flood Map dataset. The Historic Flood Map extent is much larger than the Generalised model extent, extending a further 33m west across the site, where there is a 2.8m elevation increase from the Generalised modelling extent. The Generalised modelling for Flood Zone 3 and 2 is similar in extent which corresponds with the relatively steep topography on site, suggesting Flood Zone 2's historical extent is likely to be inaccurate. The topography on site shows a 6m change in elevation from west to east, highlighting that it is extremely unlikely this this depth of flooding would occur on site across the Flood Zone 2 extent. It is therefore likely that Flood Zone 2 is not a fair representation of the Flood Zones on site and development can proceed within Flood Zone 2, avoiding Flood Zone 3 to the east. As there is no detailed modelling available for this site, Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b and confirm the extent of Flood Zone 3a and Flood Zone 2.

Fluvial plus climate change

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset has been used to assess the depth, hazard and velocity flood risk to the site. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Surface water

During the 3.3% AEP event less than 1% of the site is shown to be at risk of flooding in the northeastern corner with a maximum depth of 0.29m. Within the 1% AEP event, a flow path forms from the centre of the site out to the east, increasing in extent out to the west during the 0.1% AEP event. It is therefore evident that as the flooding extent increases, the average flood depth decreases. The mean depth, velocity and hazard within the 0.1% AEP event are shown to be 0.12m, 0.7m/s and 0.65 (a 'caution') respectively.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios to the north and east of the site with the extent increasing west in the 0.1% AEP plus 65% climate change up to 56% site coverage. The mean depth also increases to 0.28m. The average velocity is shown to be 0.87m/s, with a maximum of 2.07m/s. The average hazard rating is shown to be a 'danger to some' at 1.08.

[53] ccf-003-appendix-a1-coly_06-site-report.pdf

Key points and constraints from SFRA Level 2

Access and egress is likely to be possible with depths up to 0.32m in a small, localised area on the B3161 to the west of the site shown in the 1% AEP plus climate change surface water modelling.

17% located within surface water flood risk during the 0.1% AEP extent and 56% within 0.1% AEP plus 65% climate change.

The site is located within Flood Zone 2 and 3.

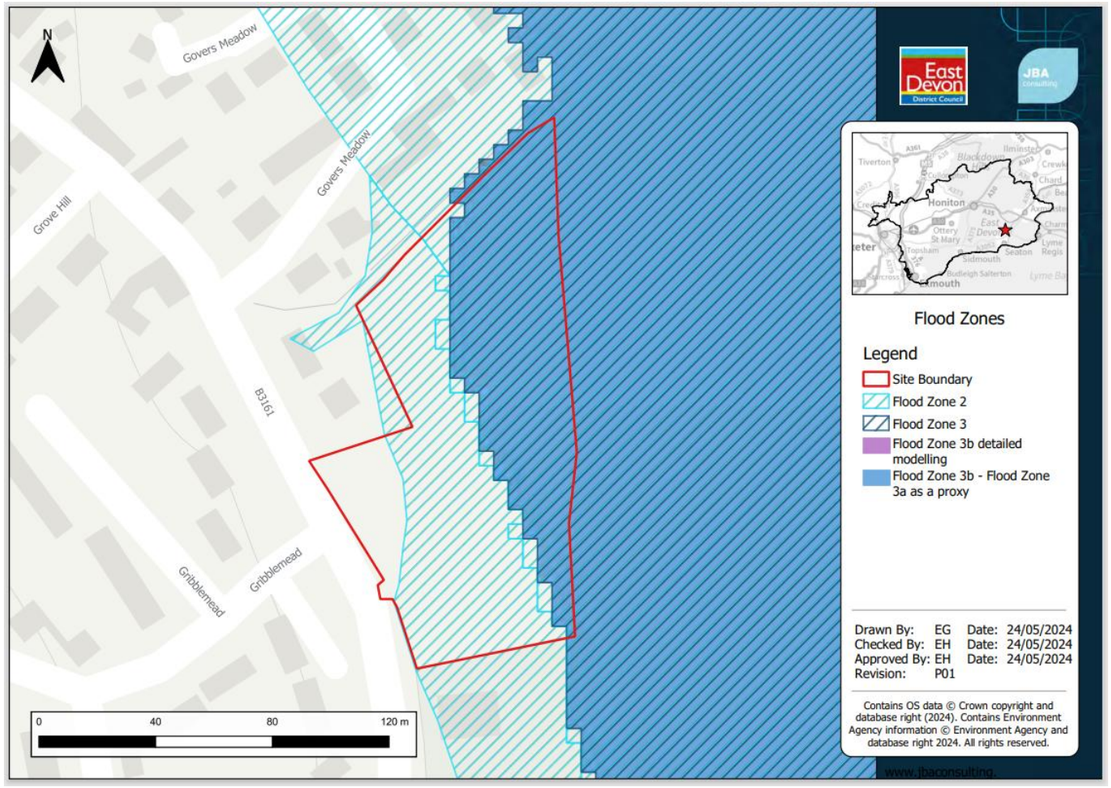
No identified sewer, reservoir or tidal flood risk and is not located within a CDA, Groundwater SPZ or NVZ. The site is identified to be within an area of flood warning and alerts.

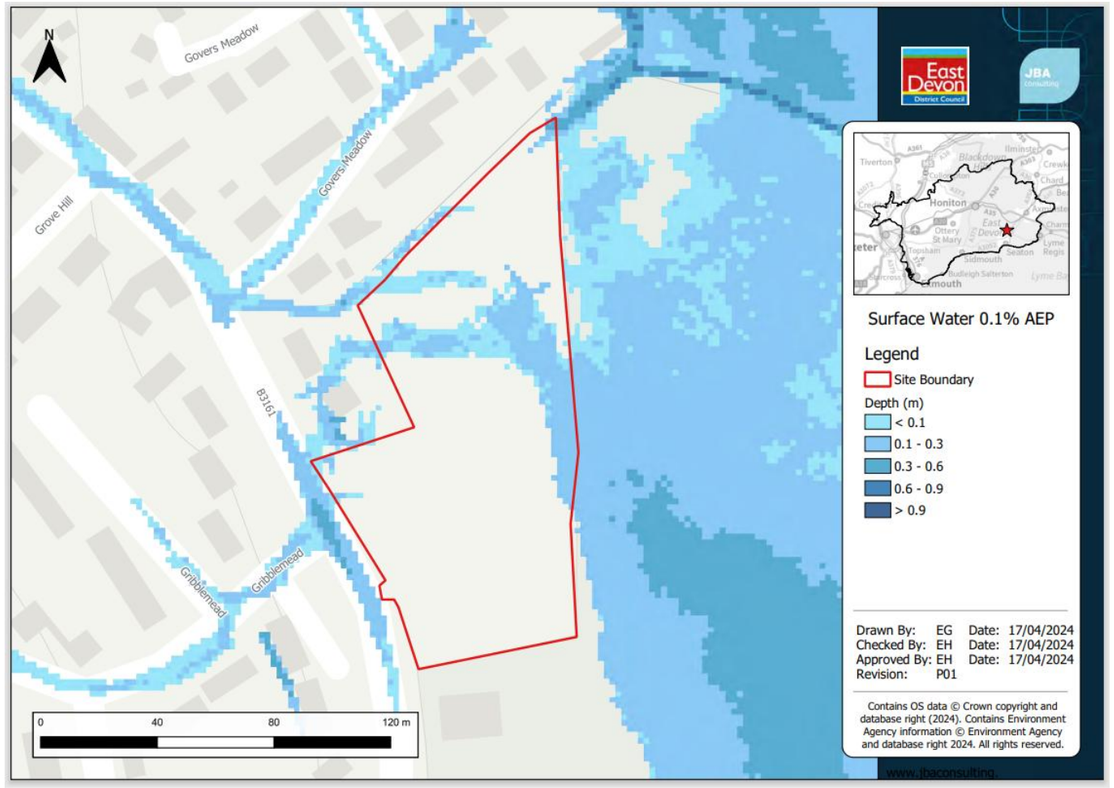
Local Plan Policy

Strategic Policy SD09: Development allocations at Colyton Land adjacent to the Peace Memorial Playing Fields (Coly_06a)

This site, adjacent to the Peace Memorial playing fields, is allocated for 12 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should inform the proposals for development of this site. However, more detailed flood assessment work and appropriate mitigation may be required as part of any proposal and should be assessed as part of a strategy informing proposals. Flood zone 3 land at the site may offer some scope for open space uses but should not form part of gardens, car parking or other features associated with individual plots. To ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development should explore the opportunity to widen the footway along frontage and deliver a suitable crossing, with best endeavours to avoid a crossroad type arrangement with Gribble Mead.

Selected Maps[54]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Colyton with a lower probability of flooding, taking into account wider sustainable development objectives.

In addition to the 12 dwellings proposed at Coly_06, 49 are proposed at Coly_02, making a total of 61 for the town. This amounts to an increase in the number of dwellings in Colyton of around 6%[55], which could be regarded as low for a 'Local Centre', where the strategy of the local plan[56] is to support growth that meets local needs and those in the immediate surroundings.

Of the 3 reasonable alternative sites identified for development at Colyton in the Sustainability Appraisal (Coly_02, Coly_03 and Coly_06), Coly_06 has the highest risk of flooding. However, Coly_06 has the best relationship to the town and the least landscape impact. Furthermore, the SFRA L2 assessment provides evidence to demonstrate that the extent of flood zone 2 mapped is unlikely to be accurate and that the

[54] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon
[55] Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09.
[56] See paragraph 6.2 of this paper

actual flood risk is lower. This conclusion is reinforced by an appeal decision on the site where the Inspector recognised that parts of the site were in flood zones 2 and 3, but noted the lack of objection from the Environment Agency and concluded that the proposal would be acceptable in principle in regard to flood risk[57].

It is likely that large parts of the site are at low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the exception test is needed for this site.

In order to pass Part A of the exception test, it must be demonstrated that the development would "provide wider sustainability benefits to the community that outweigh the flood risk"[58]. In addition to the factors noted for the sequential test, the site is currently overgrown and is the best option for providing additional housing in Colyton taking all factors into consideration so part A of the exception test is passed.

To pass 'Part B' of the exception test it must be shown that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The SFRA L2 has demonstrated that it would be possible to meet this requirement, subject to development being placed outside of the areas at risk from surface water flooding and outside of Flood Zone 3 of the Flood Map for Planning, towards the west of the site where elevation is higher. In terms of the local plan allocation, this requirement has therefore been met, but, until a detailed planning application and accompanying FRA (supported by detailed modelling) have been submitted, it is not possible to determine whether this requirement will be met. It will therefore be necessary to reconsider the exception test at the planning application stage.

[57] Application details and appeal decision
[58] NPPF, paragraph 169

20 Appendix L Sequential Test – Exmouth Town Centre Police Station (Exmo_50)

Summary

Sequential test – passed.

Exception test – not required subject to there being no development in the areas of the site at risk of surface water flooding.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[59], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk of flooding.

Fluvial

The proposed development site has not been identified to be in an area at risk of fluvial flooding in the future.

Surface water

The site is shown to be at risk of flooding in the 3.3% and 1% AEP events with localised flooding in the south during the 3.3% AEP event and the north and south of the site during the 1% AEP event averaging 0.23m. During the 0.1% AEP event flow paths connect and extend west onto Clarence Road with average depths of 0.24m. The average hazard and velocity on site during the 0.1% AEP event are shown to be 0.88 ‘a danger to some’ and 0.26m/s respectively.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with localised flooding to the centre and north of the site during the 3.3% plus climate change event, with an average mean depth of 0.24m. During the 0.1% AEP event 38% of the site is shown to flood with a flow path surrounding the existing building on site, increasing the mean depth to 0.29m. The average velocity on site is shown to be no more than 0.43m/s, with a maximum velocity of 1.81m/s during the 0.1% AEP plus 65% climate change event. The average hazard rating is 0.97 and is therefore stated to be a ‘danger to some’.

Key points and constraints from SFRA Level 2

Available access and egress with depths up to 0.3m along Clarence Road.

20% located within surface water flood risk during the 0.1% AEP extent and 38% within 0.1% AEP plus 65% climate change.

No identified sewer, reservoir, tidal or fluvial flood risk and is not located within an area of flood warning and alerts, CDA or Groundwater SPZ.

The site is located within a Nitrate Vulnerable Zone.

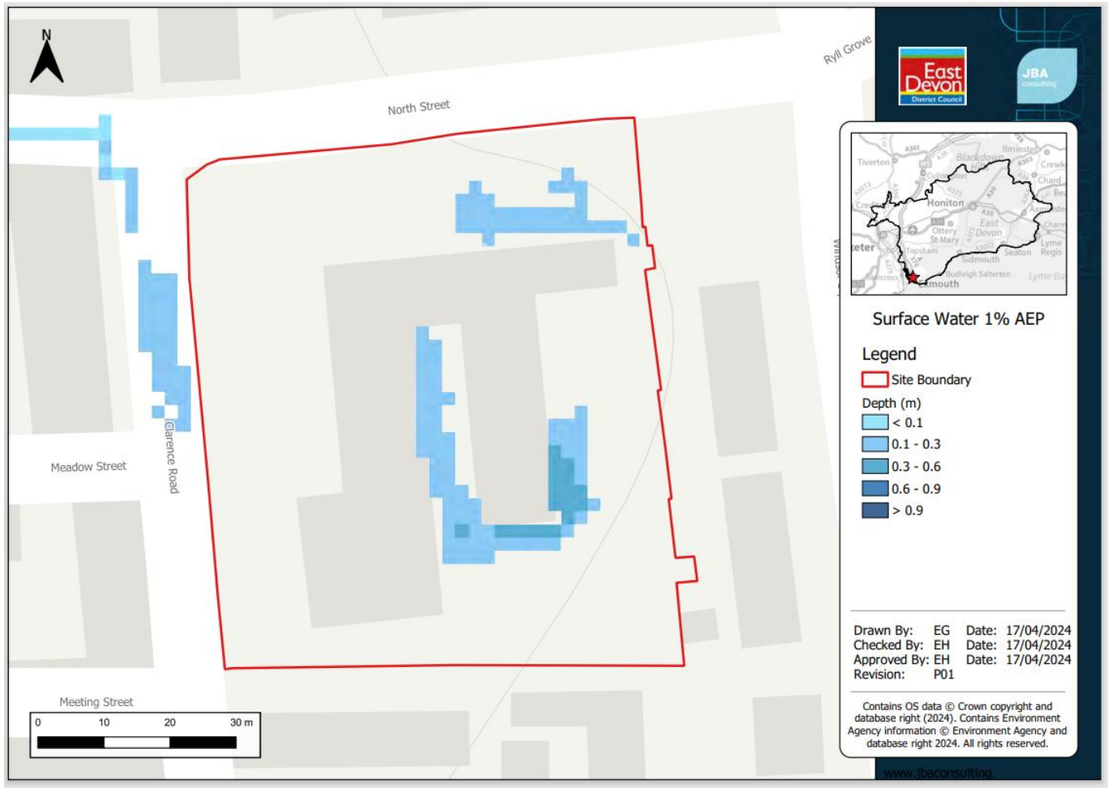
Local Plan Policy

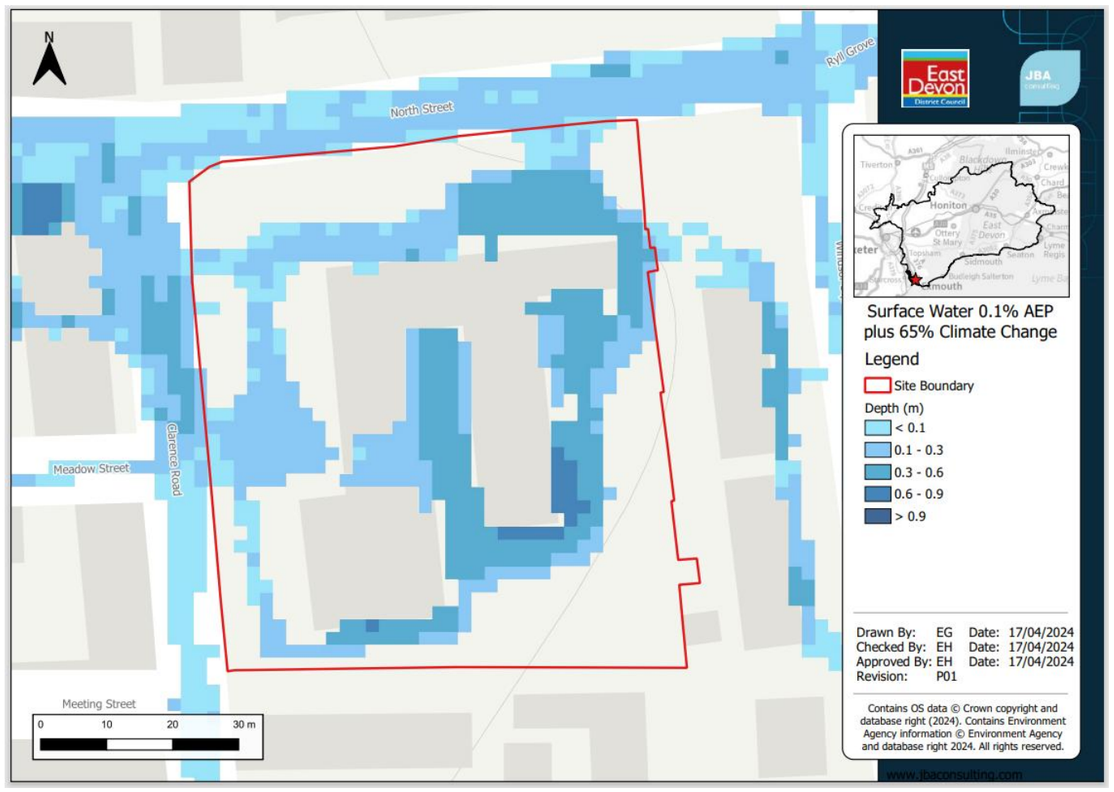
Strategic Policy SD01: Exmouth and its development allocations Exmouth town centre Police Station (Exmo_50)

[59] ccf-003-appendix-a1-exmo_50-site-report.pdf

This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes, though with skilful design, noting the significance heritage interests around the site, a greater number of new homes will be actively encouraged. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Selected Maps[60]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Exmouth with a lower probability of flooding, taking into account wider sustainable development objectives.

Exmouth is the principal settlement in East Devon and the local plan strategy is to promote significant levels of development at the town. 22 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 10 sites are included as allocations. Some of the rejected sites have a lower flood risk than Exmo_50, but other factors meant that they were not suitable for allocation, as set out in the sustainability appraisal. The total number of dwellings proposed at Exmouth is 1,455. This accounts for around 10.7 percent of the total number of homes to be delivered through allocations[61]. This is

[60] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon
[61] Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09.

generally in line with the spatial strategy, but could be considered low were it not for the considerable constraints to development around Exmouth. Many of the allocations have sensitivities that will require very careful design and mitigation.

The Sustainability Appraisal notes the surface water flood risk on Exmo_50, but considers that development can avoid it, and the site was allocated because it is consistent with the spatial strategy, occupies an urban residential location on a brownfield, close to numerous jobs, services and facilities

Parts of the site are at low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the Exception Test is not required for this site, provided development is proposed outside of the areas at risk of surface water flooding.

21 Appendix M Sequential Test - Land to the west and southwest of the Old Inn Kilmington (Kilm_10)

Summary

Sequential test – passed.

Exception test – not required subject to there being no development in the areas of the site at risk of surface water flooding.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[62], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk of flooding.

Fluvial

The proposed development site has not been identified to be in an area at risk of fluvial flooding.

Surface water

The site is shown to be at risk of flooding in the 3.3% and 1% AEP events with localised flooding in the northwest of the site averaging 0.23m. During the 0.1% AEP event flow paths extend south reducing average depths to 0.19m, with additional localised flooding to the south. It is therefore evident that as the flooding extent increases, the average flood depth decreases. The average hazard and velocity on site during the 0.1% AEP event are shown to be a rating of 0.73 ‘a danger to some’ and 0.31m/s respectively.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with localised flooding to the northwest during the 3.33% plus climate change event, with an average mean depth of 0.21m. During the 0.1% AEP event a flow path is formed connecting the south to the north, slightly lowering the mean depth to 0.2m. The average velocity on site during the 0.1% AEP plus 65% climate change event is shown to be 0.54m/s, with a maximum of 1.85m/s. The average hazard rating is shown to be ‘dangerous to some’ at 0.83.

Key points and constraints from SFRA Level 2

Access and egress affected and should be assessed within a site-specific FRA.

18% located within surface water flood risk during the 0.1% AEP extent and 36% within 0.1% AEP plus 65% climate change.

No identified sewer, reservoir, tidal, fluvial flood risk. No flood warnings or alerts.

The site is not located within a CDA, Groundwater SPZ and NVZ.

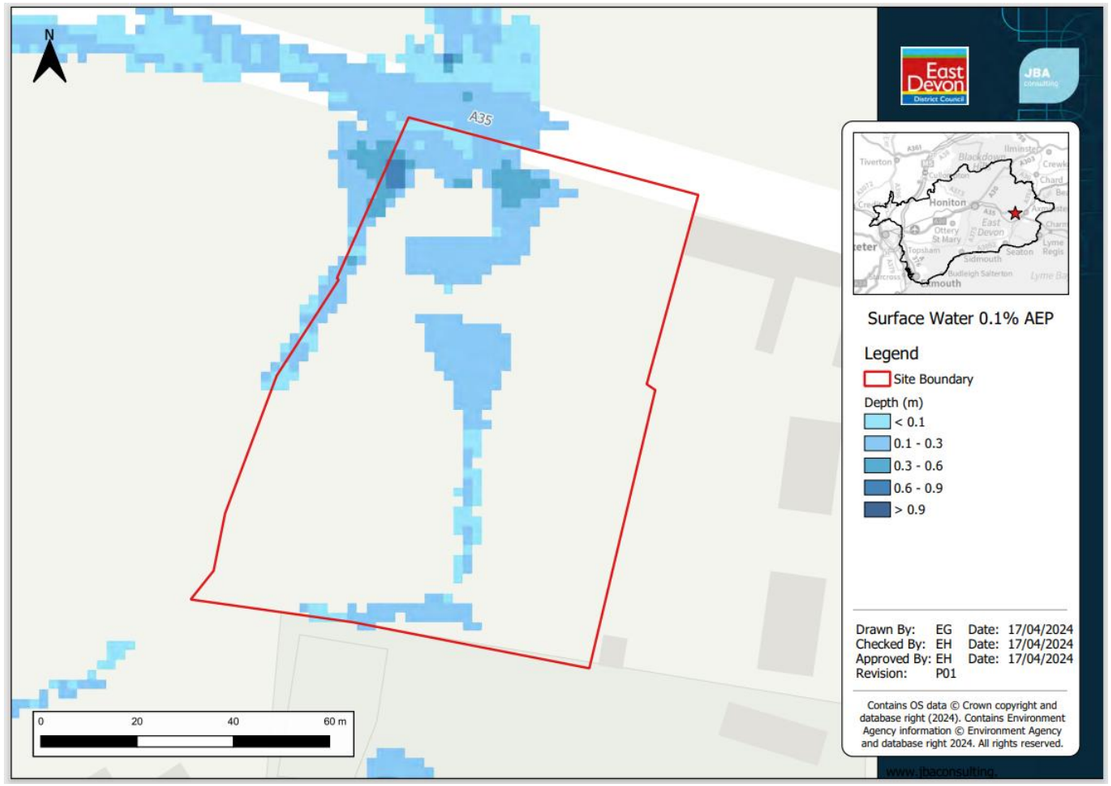
[62] ccf-003-appendix-a1-kilm_10-site-report.pdf

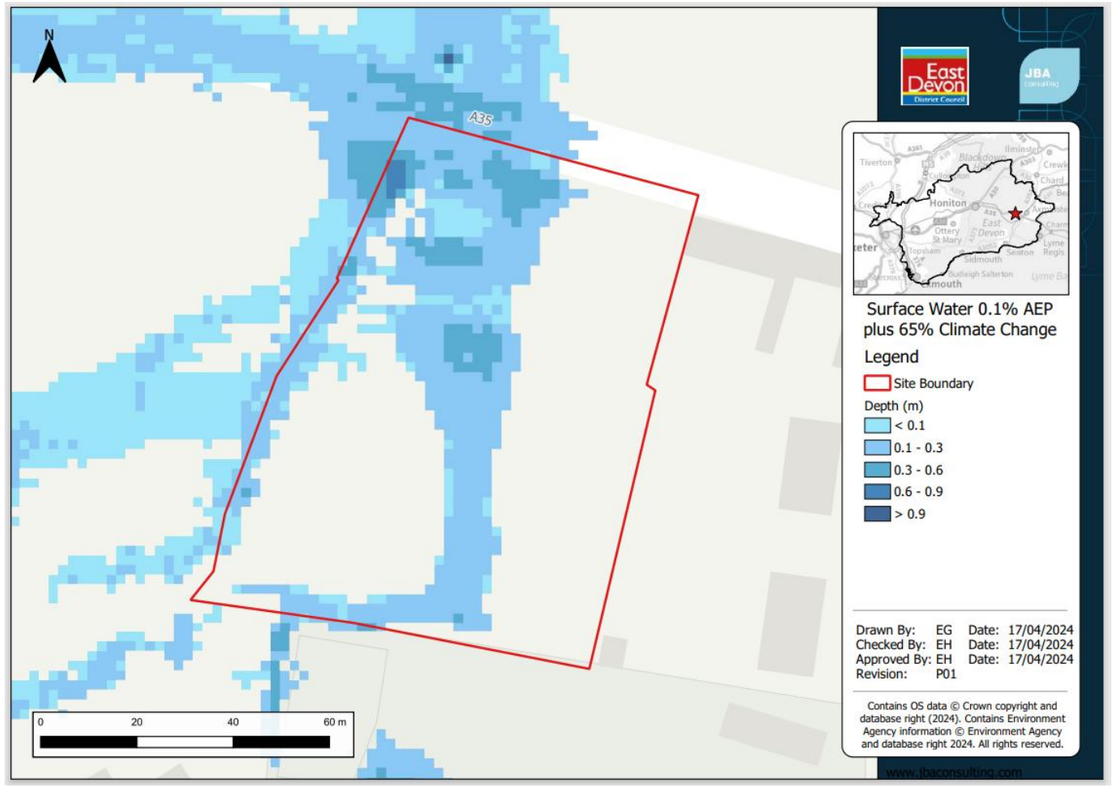
Local Plan Policy

Strategic Policy SD20: Development allocations at Kilmington Land to the west and south west of the Old Inn (Kilm_10).

Land to the west and south west of the Old Inn is allocated for 5 homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be addressed through development proposals. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. A sensitively designed scheme will also be essential to avoid potential for adverse impacts on the listed adjoining public house. The preference is for highway access to this site to be gained from site Kilm_09b to the west.

Selected Maps[63]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Kilmington with a lower probability of flooding, taking into account wider sustainable development objectives.

Kilmington is a service village where limited development is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 10 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 2 sites are included as allocations. All of the other sites have a lower flood risk, but other factors mean that they were not suitable for allocation, as set out in the sustainability

[63] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

appraisal. The total number of dwellings proposed at Kilmington is 28 which would result in a 6% increase in the number of homes in the village, which is compatible with the plan strategy[64]. The Sustainability Appraisal notes that part of Kilm_10 is at risk of flooding, but the site is allocated because it is consistent with the spatial strategy, has good access to facilities and employment, and is partly on previously developed land.

Parts of the site are at low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the Exception Test is not required for this site, provided development is proposed outside of the areas at risk of surface water flooding.

[64] Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09.

22 Appendix N Sequential Test - Land at Baxter's Farm, Musbury (Musb_01a)

Summary

Sequential test – passed.

Exception test – passed in principle but will need to be re-assessed at planning application stage.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[65], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally at low risk of flooding, but a site-specific flood risk assessment will be required to assess the risk of fluvial, surface water and groundwater flooding in relation to the proposed development, and the access and egress arrangements (although access should be taken from the A375, which is in flood zone 1, in accordance with the Baxter's Farm Development Brief). Detailed flood modelling may be required during a site specific flood risk assessment.

Fluvial

The site is mostly located within Flood Zone 1, however a small corner to the northeast of the site is located within Flood Zone 2 and 3. As there is no detailed modelling available for this site, Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b.

Fluvial plus climate change

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset with a climate change allowance has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Surface water

The site is shown to be at risk of flooding in the 3.3% and 1% AEP events with localised flooding in the north and centre of the site. It is likely the maximum flood depth on site (1.1m) during these events is within an agriculturally beneficial depression (previous slurry pit or feed storage area). During the 0.1% AEP event a flow path from west to east connects 'The Street' to the A358, with a mean depth of 0.21m. It is therefore evident that as the flooding extent increases, the average flood depth decreases. The average hazard and velocity on site during the 0.1% AEP event are shown to be a 'danger to some' (0.81) and 0.67m/s respectively across the site. It should be noted that an existing flow path to the south of the site is not represented in the RoFSW mapping, and therefore further investigation will be required within a site-specific FRA.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with localised flooding to the northwest during the 3.33% plus climate change event, with an average mean depth of 0.21m. During the 0.1% AEP event a flow path is formed connecting the south to the north, slightly lowering the mean depth to 0.2m. The average velocity on site during the 0.1% AEP plus 65% climate change event is shown to be 0.54m/s, with a maximum of 1.85m/s. The average hazard rating is shown to be 'dangerous to some' at 0.83.

Groundwater

Groundwater levels on site are split with the eastern half at 'Low risk', and the western half either at or very near (within 0.025m of) the ground surface during a 1% AEP groundwater flood event. Flow paths would be expected to follow the topography of the site and be similar to surface water flow paths. The risk of groundwater flooding will require further consideration in a site-specific flood risk assessment.

[65] ccf-003-appendix-a1-musb_01a-site-report.pdf

Key points and constraints from SFRA Level 2

Access and egress affected and should be assessed within a site-specific FRA.

21% located within surface water flood risk during the 0.1% AEP extent and 41% within 0.1% AEP plus 65% climate change.

A small corner to the northeast of the site is located within Flood Zone 2 and 3.

No identified sewer, reservoir or tidal flood risk. No flood warnings, however, the site is located within a flood alert area.

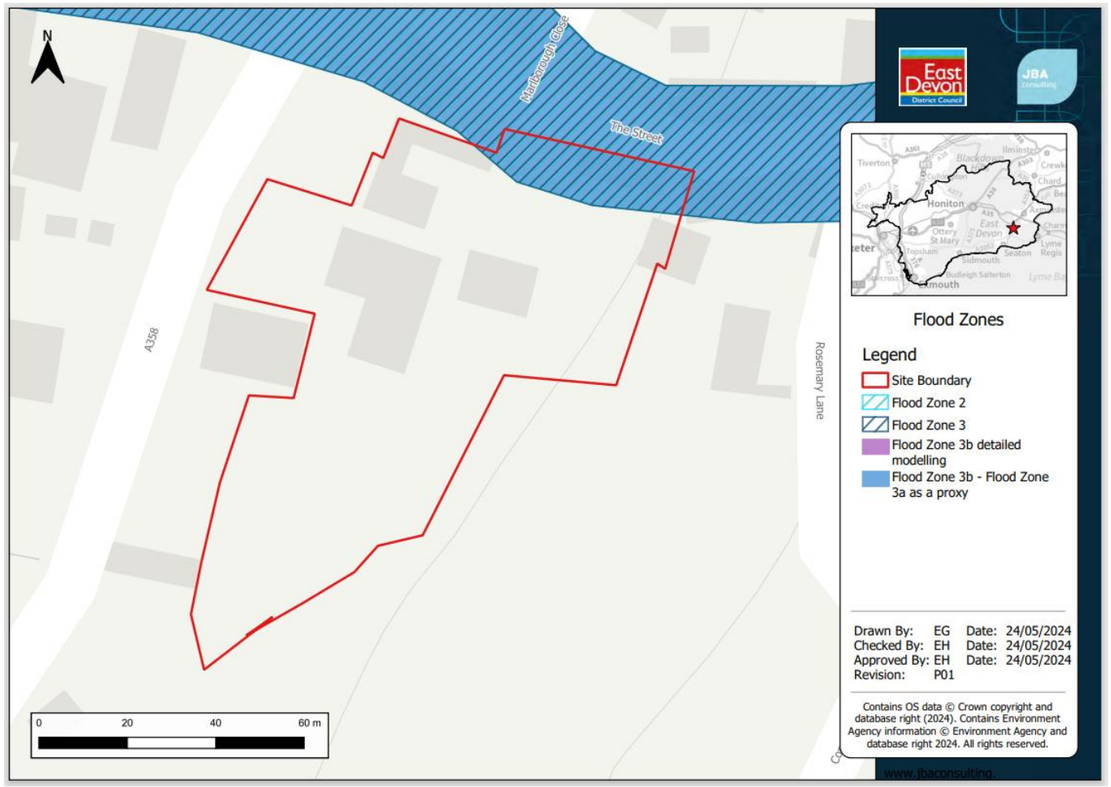
The site is not located within a CDA, Groundwater SPZ and NVZ.

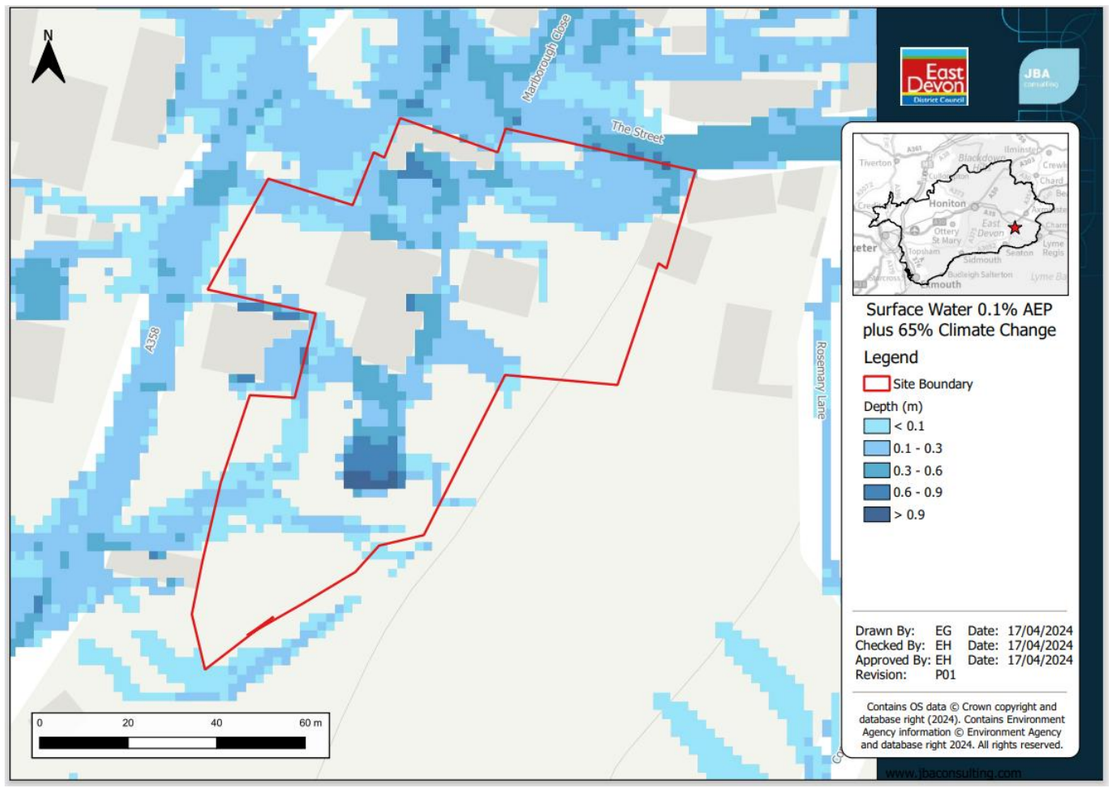
Local Plan Policy

Land at Baxter's Farm (Musb_01a)

The site is allocated for15 new homes with 0.06 hectares of employment uses. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and an exception test have been undertaken as part of the local plan. A high quality scheme is required at this site which is likely to require some conversions and some new build. The Council has prepared a Development Brief for this site (though there is no longer an expectation of the site providing Gypsy and Traveller pitches).

Selected Maps[66]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Musbury with a lower probability of flooding, taking into account wider sustainable development objectives.

Musbury is a service village where limited development is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 4 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and part of one site is included as an allocation. Two of the other sites have a lower flood risk than Musb_01a, but other factors mean that they were not suitable for allocation, as set out in the sustainability appraisal. The total number of dwellings proposed at Musbury is 15, which would result in a 6% increase in the number of homes in the village, which is compatible with the plan strategy. The Sustainability Appraisal notes that part of Musb_01 is at risk of flooding, but the site is allocated because it is consistent with the spatial strategy with good access to services/facilities and it makes good use of existing building and former farmyard. Parts of the site are at low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

[66] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Exception test

The SFRA L2 advises that the exception test is needed for this site.

In order to pass Part A of the exception test, it must be demonstrated that the development would "provide wider sustainability benefits to the community that outweigh the flood risk"[67].

The site comprises a former farmyard with a collection of agricultural buildings and a small field that is largely surrounded by buildings. There is a locally listed farmhouse, which is in flood zone 3, and some older farm buildings that are heritage assets. There are also some more modern farm buildings that are dilapidated and unattractive areas of hardstanding. The site is vacant, and its redevelopment would provide wider community benefits, including the conservation of a local heritage assets. Provision of a small range of business uses fronting Seaton Road (in accordance with the development brief) would help to create employment opportunities in the village. Implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could provide wider sustainability benefits to the site and surrounding area.

To pass 'Part B' of the exception test it must be shown that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The SFRA L2 advises that development is placed outside of the areas at risk from surface water flooding and within Flood Zone 1 and could reduce the flood risk to the site.

In terms of the local plan allocation, this requirement has been met, but, until a detailed planning application and accompanying FRA have been submitted, it is not possible to determine whether this requirement will be met. It will therefore be necessary to reconsider the exception test at the planning application stage.

[67] NPPF, paragraph 169

23 Appendix O Sequential Test - Land at Salston Barton, Ottery St. Mary (Otry_10)

Summary

Sequential test – passed.

Exception test – not required subject to there being no development in the areas of the site at risk of fluvial or surface water flooding.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[68], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk, with a small portion of land to the south that is unlikely to be developable.

Fluvial

The site is partially located within Flood Zone 2 and 3 to the south of the site, and Flood Zone 2 to the northeast. The remainder (the majority) of the site is located within Flood Zone 1. As there is no detailed modelling available for this site, Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b.In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment

Fluvial plus climate change

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset with a climate change allowance has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment

Surface water

The site is shown to be at risk of flooding in the 3.3% AEP event with less than 1% at risk to the south of the site, and a mean/max depth of 0.17m. The extent of flooding increases in the southern portion of the site across the 1% and 0.1% AEP events. It is evident that as the flooding extent increases from the 3.3% AEP to the 1% AEP events, the average flood depth decreases. The mean velocity and hazard during the 0.1% AEP events are shown to be 1m/s and 0.94 rated as a ‘danger to some’.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios to the south of the site with an average depth in the 0.1% AEP plus 65% climate change of 0.34m. The average velocity is shown to be 1.59m/s, with a maximum of 2.96m/s. The average hazard rating is shown to be a ‘danger to most’ at 1.53, however this only relates to a small proportion of the site, as only 13% of the site is at risk of flooding in the 0.1% AEP plus climate change event.

Groundwater

During a 1% AEP groundwater flood event, groundwater levels on site are predominantly either at or very near (within 0.025m of) the ground surface, with a small portion to the west of the site between 0.025m and 0.5m below the ground surface. Flow paths would be expected to follow the topography of the site and be similar to surface water flow paths. The risk of groundwater flooding will require further consideration in a site-specific flood risk assessment.

[68] ccf-003-appendix-a1-otry_10-site-report.pdf

Key points and constraints from SFRA Level 2

Access and egress is available with depths up to 0.07m along Strawberry Lane in the 1% AEP plus climate change surface water modelling.

9% located within surface water flood risk during the 0.1% AEP extent and 13% within 0.1% AEP plus 65% climate change.

The site is partially located within Flood Zone 2 and 3.

No identified sewer, reservoir or tidal flood risk.

The site is located within a Nitrate Vulnerable Zone, and an area of flood warning and alerts.

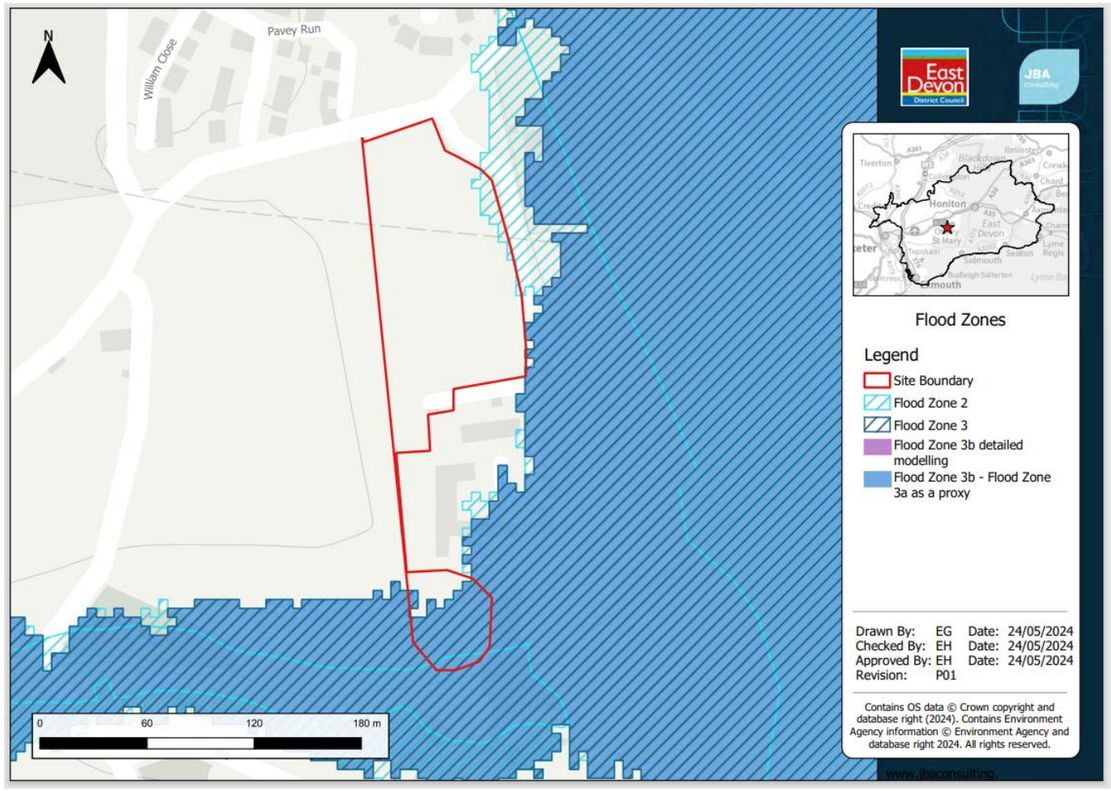
The site is not located within a Critical Drainage Area and Groundwater Source Protection Zone.

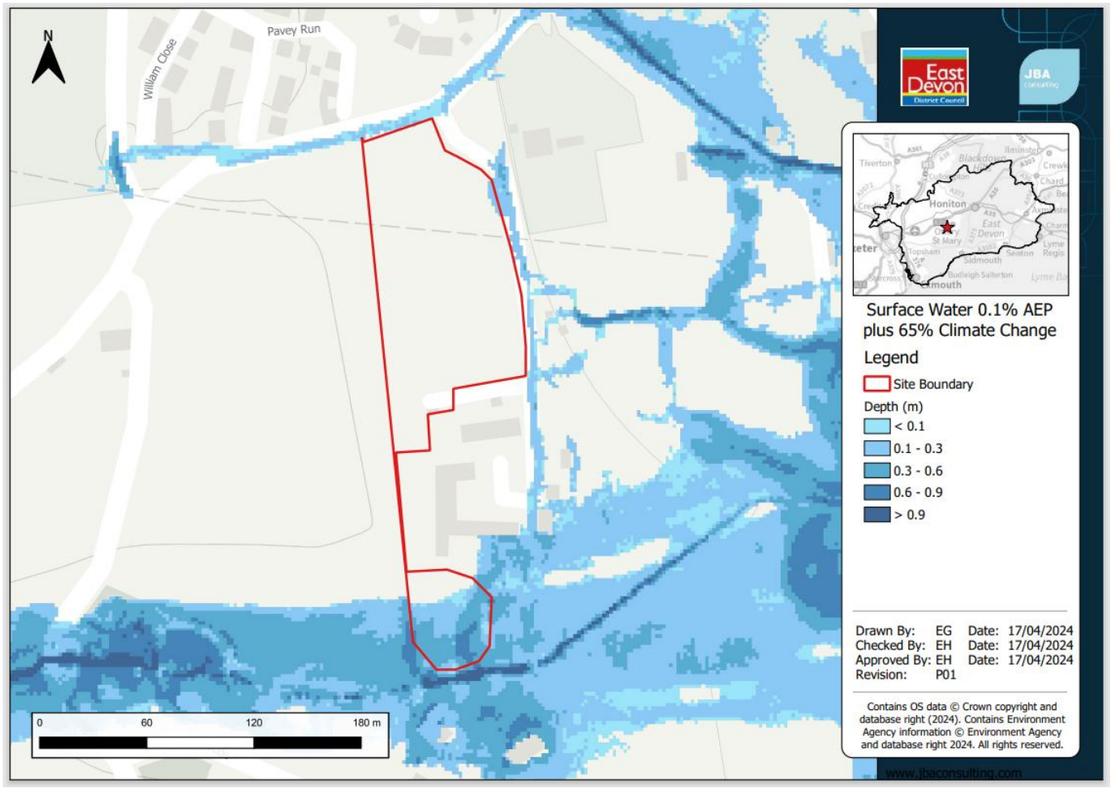
Local Plan Policy

Strategic Policy SD04: Ottery St Mary and its development allocations Land at Salston Barton (Otry_10).

This land, which lies north and south of Salston Barton, is proposed for 20 houses. Archaeological assessment will be required prior to development commencing. This allocation must be supported by details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Selected Maps[69]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Ottery St. Mary with a lower probability of flooding, taking into account wider sustainable development objectives.

Ottery St. Mary is a main centre where significant development is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 13 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 6 sites are included as allocations. The Sustainability Appraisal notes that “a significant band of flooding bisects the town along the River Otter and its tributaries, leading to one site being discounted at stage 1. The remaining sites are largely unaffected by river or surface water flooding constraints, however those which have small parts within flood zone 2 and 3 are Otry_09, Otry_10, GH/ED/26, GH/ED/27, Otry_21, Otry_18, GH/ED/31, GH/ED/33/GH/ED/34 and GH/ED/35. This is unlikely to have a significant bearing on the area of the sites to be developed as in most cases it is a narrow band of flooding along a boundary”. Otry_10 was allocated because it is consistent with the spatial strategy, reasonably well located in relation to the town, accessible to most facilities and performed well in landscape, ecology and heritage terms. Alternative sites were rejected for a variety of reasons including poor relationship to town, highway capacity/safety concerns and impacts on ecology, heritage and landscape.

The total number of dwellings proposed at Ottery St. Mary is 318 which would result in a 12% increase in the number of homes in the town, which is compatible with the plan strategy.

[69] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Most of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the Exception Test is not required for this site, provided providing development is proposed to the north/west of the site (outside of the areas at risk of fluvial or surface water flooding).

24 Appendix P Sequential Test - Land south of Strawberry Lane, Ottery St. Mary (GH/ED/27)

Summary

Sequential test – passed.

Exception test – not required subject to development being sited outside of the areas at risk and within Flood Zone 1.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[70], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site is partially located within Flood Zone 2 and 3 to the south of the site. The remainder (the majority) of the site is located within Flood Zone 1. As there is no detailed modelling available for this site, Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b.In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Fluvial plus climate change

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset with a climate change allowance has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment

Surface water

The site is shown to be at risk of flooding to the south of the site in all three scenarios, with a mean depth of 0.11m in both the 3.33% and 1% AEP events. During the 0.1% AEP event the surface water extent covers the southern portion of the site, with a mean depth of 0.18m. The velocity on site during the 0.1% AEP event is shown to be 1.21m/s, with a maximum of 2.93m/s. The hazard rating is stated to be a ‘danger to some’ at 0.94.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios to the south of the site with an average depth in the 0.1% AEP plus 65% climate change of 0.37m. The average velocity is shown to be 2.02m/s, with a maximum of 3.35m/s. The average hazard rating is shown to be a ‘danger to most’ at 1.86, however this only relates to a small proportion of the site, as only 14% of the site is at risk of flooding in the 0.1% AEP plus climate change event.

Groundwater

During a 1% AEP groundwater flood event, groundwater levels on site are predominantly between 0.025m and 0.5m below the ground surface, with small areas to the north and south of the site either at or very near (within 0.025m of) the ground surface. The west of the site has groundwater levels between 0.5m and 5m below the ground surface. Flow paths would be expected to follow the topography of the site and be similar to surface water flow paths. The risk of groundwater flooding will require further consideration in a site-specific flood risk assessment.

[70] ccf-003-appendix-a1-gh-ed-27-site-report.pdf

Key points and constraints from SFRA Level 2

Access and egress is likely to be possible with depths up to 0.07m along Strawberry Lane in the 1% AEP plus climate change surface water modelling.

12% located within surface water flood risk during the 0.1% AEP extent and 14% within 0.1% AEP plus 65% climate change.

The site is partially located within Flood Zone 2 and 3

No identified sewer, reservoir or tidal flood risk.

The site is located within a Nitrate Vulnerable Zone, and an area of flood warning and alerts.

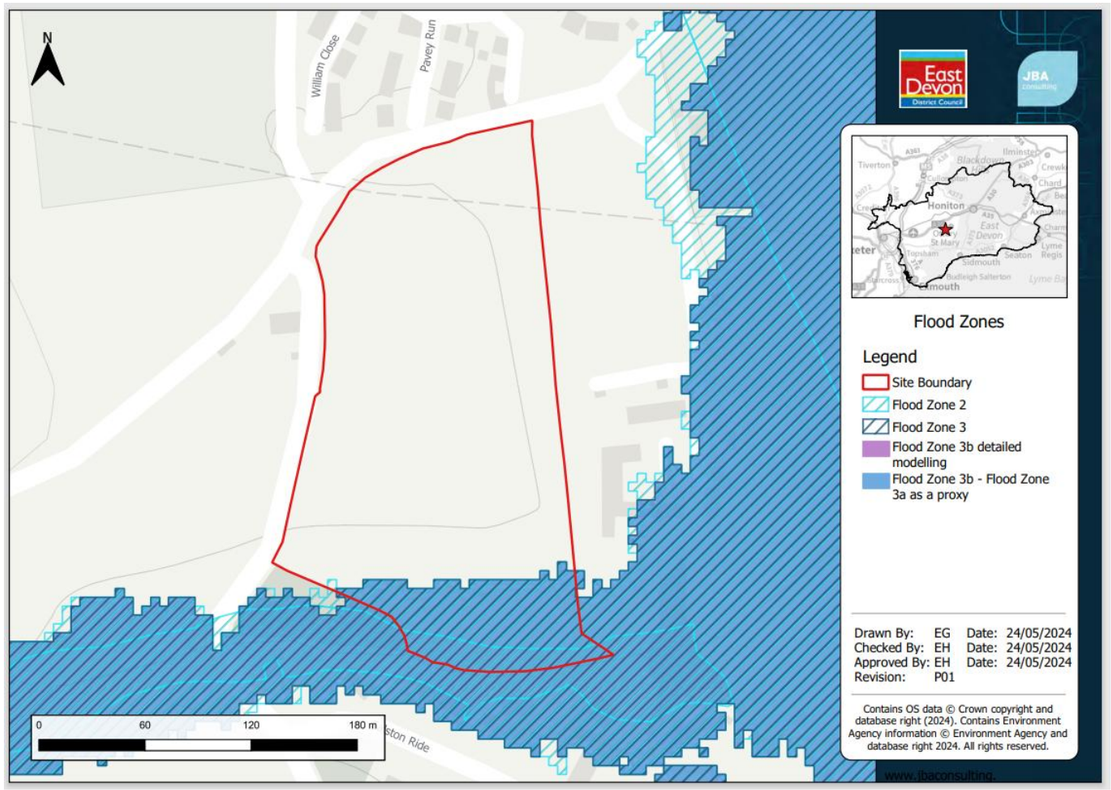
The site is not located within a Critical Drainage Area and Groundwater Source Protection Zone.

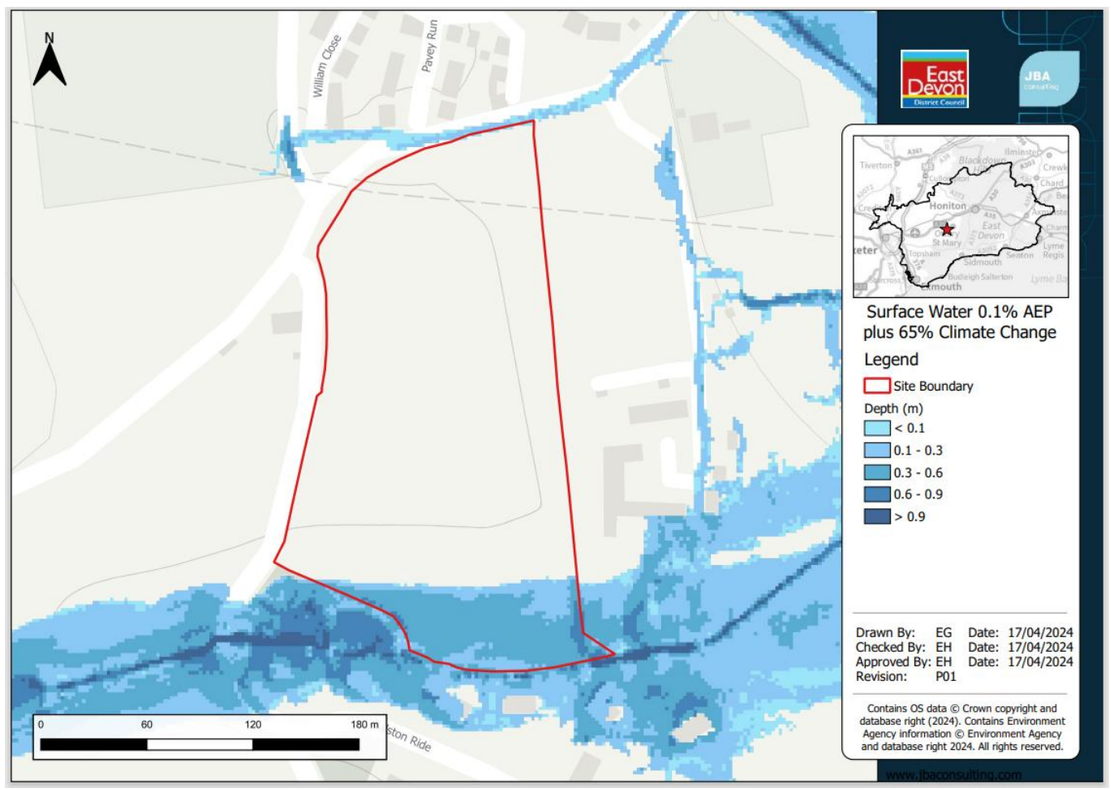
Local Plan Policy

Strategic Policy SD04: Ottery St Mary and its development allocations Land south of Strawberry Lane (GH/ED/27)

This land lies south of Strawberry Lane and is proposed for 60 houses. This allocation will need to be supported by further flood risk assessment work, details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Selected Maps[71]





Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Ottery St. Mary with a lower probability of flooding, taking into account wider sustainable development objectives.

Ottery St. Mary is a main centre where significant development is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 13 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 6 sites are included as allocations. The Sustainability Appraisal notes that “a significant band of flooding bisects the town along the River Otter and its tributaries, leading to one site being discounted at stage 1. The remaining sites are largely unaffected by river or surface water flooding constraints, however those which have small parts within flood zone 2 and 3 are Otry_09, Otry_10, GH/ED/26, GH/ED/27, Otry_21, Otry_18, GH/ED/31, GH/ED/33/GH/ED/34 and GH/ED/35. This is unlikely to have a significant bearing on the area of the sites to be developed as in most cases it is a narrow band of flooding along a boundary”. GH.ED.27 was allocated because it was consistent with the spatial strategy, had no major negative environmental effect and would ‘round-off’ this part of the town. Alternative sites were rejected for a variety of reasons including poor relationship to town, highway capacity/safety concerns and impacts on ecology, heritage and landscape.

The total number of dwellings proposed at Ottery St. Mary is 318 which would result in a 12% increase in the number of homes in the town, which is compatible with the plan strategy.

[71] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Most of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the Exception Test is not required for this site, provided development is proposed outside of the areas at risk and within Flood Zone 1, the Exception Test is not required for this site. Should development be proposed within areas at risk of flooding, the Exception Test will be required and detailed flood modelling should be undertaken during a site-specific FRA.

25 Appendix Q Sequential Test - Land at Station Road, Whimple (Whim_11)

Summary

Sequential test – passed.

Exception test – not required subject to development being development to the south of the site (outside of the areas at risk).

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[72], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site is partially located within Flood Zone 2 and 3 to the north of the site adjacent to the unnamed watercourse. The remainder (the majority) of the site is located within Flood Zone 1. As there is no detailed modelling available for this site, Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b. In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Fluvial plus climate change

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset with a climate change allowance has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Surface water

The site is shown to be at risk of flooding in the 3.3% and 1% AEP events with localised flooding in the northwest of the site averaging a maximum of 0.25m. During the 0.1% AEP event the flooding extends south, decreasing the mean depth to 0.2m. It is therefore evident that as the flooding extent increases, the average flood depth decreases. The average velocity and hazard on site during the 0.1% AEP event is shown to be 0.54m/s and 0.92 (a ‘danger to some’).

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios to the north of the site with an average mean depth in the 0.1% AEP plus 65% climate change of 0.72m. It is evident that as the flooding extent increases between the 3.33% AEP and the 1% AEP event, the average flood depth decreases. The average velocity is shown to be 1.89m/s, with a maximum of 3.89m/s. The average hazard rating is shown to be a ‘danger to all’ at 2.67, however this only relates to a small proportion of the site, as only 20% of the site is at risk of flooding in the 0.1% AEP plus climate change event.

Groundwater

Groundwater levels on site are shown to be predominantly ‘low risk’ with a small area to the north of the site where levels are either at or very near (within 0.025m of) the ground surface during a 1% AEP groundwater flood event.

[72] ccf-003-appendix-a1-whim_11-site-report.pdf

Key points and constraints from SFRA Level 2

Access and egress is likely possible with depths predominantly less than 0.3m.

12% located within surface water flood risk during the 0.1% AEP extent and 20% within 0.1% AEP plus 65% climate change.

The site is partially located within Flood Zone 2 and 3.

No identified sewer, reservoir or tidal flood risk, and is not located within a Groundwater SPZ and NVZ.

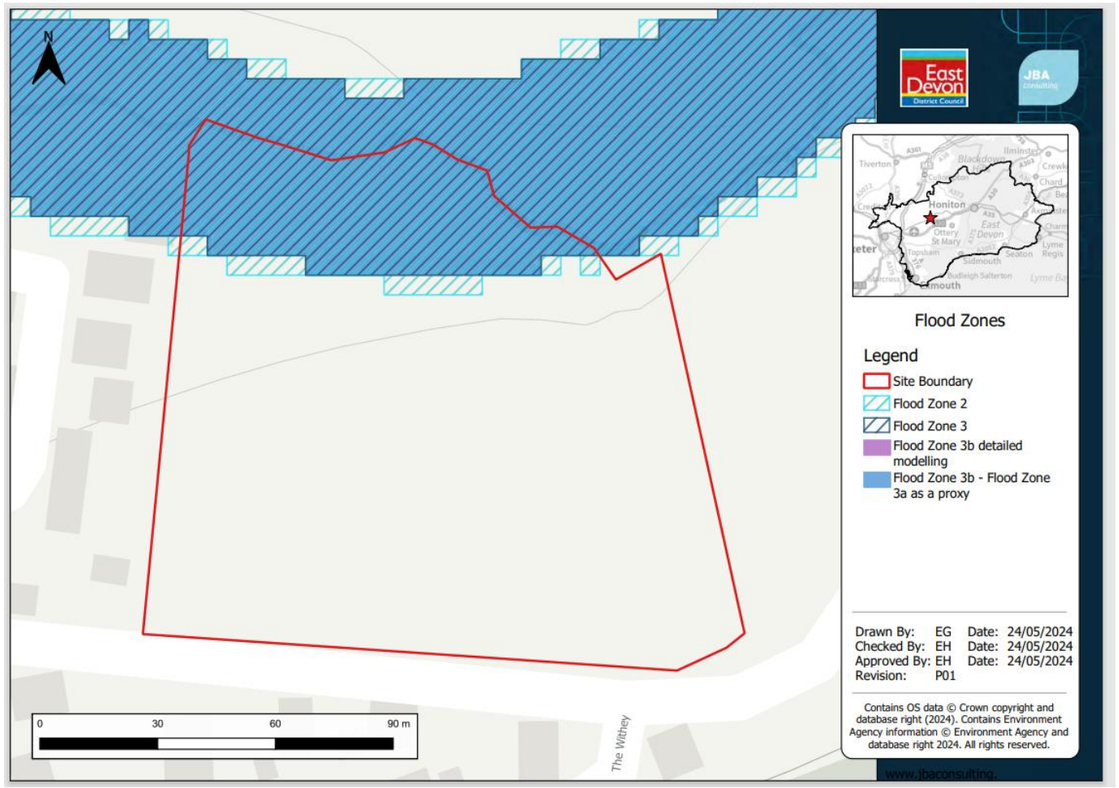
The site is located within a CDA and an area of flood alerts.

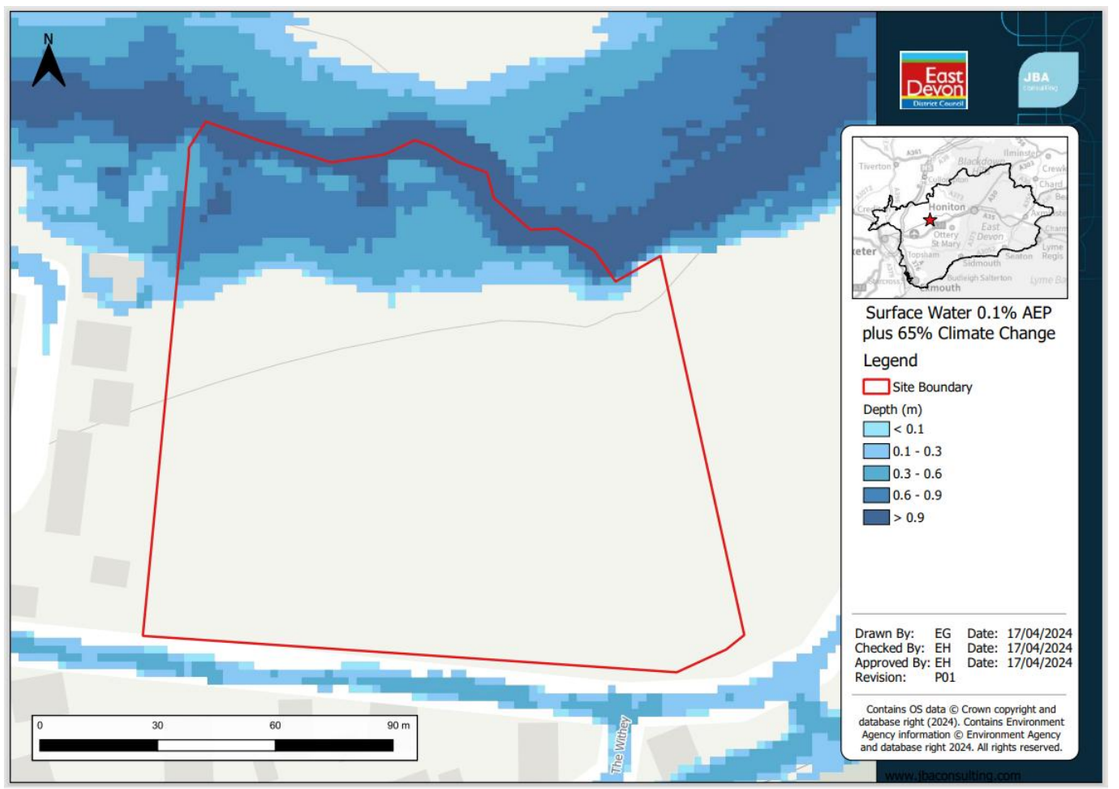
Local Plan Policy

Strategic Policy: SD29: Development allocations at Whimple Land at Station Road (Whim_11).

This site is proposed for 33 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. There may be a need for a site-specific Flood Risk Assessment at this site to assess the risk of fluvial and surface water flooding and herefore to inform development proposals. A line of trees to the site frontage and two trees within the field are subject to Tree Preservation Orders. These must be retained in development proposals. Site layout should be planned to enable convenient east to west pedestrian and cycle links to the site frontage, but behind the existing hedge and protected trees. Development proposals should deliver a footway extension from the west and tie into the site. A pedestrian access opposite the Withey should be provided if compatible with protection of trees and highway safety. Careful attention should be paid to the setting of Slewton House, a Grade II listed building. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Selected Maps[73]





[73] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Sequential test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Whimple with a lower probability of flooding, taking into account wider sustainable development objectives.

Whimple is a service village where limited development is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 9 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 2 sites are included as allocations. Many of the reasonable alternatives have elements of flood risk. The Sustainability Appraisal notes that “Whim_04, 07, 11, and 13 are wholly in a critical drainage area and partly in flood zones 2 and 3. Whim_03 is partly in a critical drainage area and partly in flood zones 2 and 3. Small parts of Whim_08 are in flood zones 2 and 3 and a small part of Whim_09 together with the land adjacent to Whim_10 are in flood zone 2.” Whim_11 was allocated because it was consistent with spatial strategy with relatively few constraints. Whim_08a was allocated as it was consistent with the spatial strategy with no major adverse effects. However, further SFRA L2 work is required on Whim_08a to understand the nature and extent of flood risk.

The total number of dwellings proposed at Whimple is 83 which would result in a 14% increase in the number of homes in the village. This scale of growth is a higher percentage increase than some similar sized settlements, but is compatible with the plan strategy and makes use of the village’s sustainable location with a station on the Exeter to London Waterloo railway.

Most of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas. The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity, helping meet requirements for the critical drainage area. This could also provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the site is partially located within Flood Zone 2 and 3, and the 0.1% AEP surface water extent, but providing development is proposed to the south of the site (outside of the areas at risk), the Exception Test is not required. Should development be proposed within Flood Zone 2 or 3, the Exception Test will be required.

26 Appendix R Sequential Test - Land east of Exeter Airport for employment purposes (GH/ED/43)

Summary

Sequential test – passed.

Exception test – not required subject to development being outside of the areas at risk.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[74], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site has not been identified to be in an area at risk of fluvial flooding.

Surface water

The site is shown to be at risk of flooding in the 1% and 0.1% AEP events with a flow path from north to southwest along the western and northern boundaries with predominantly shallow depths (averaging 0.37m). During the 3.33% AEP events localised areas to the northwest and west are shown to be at risk, with a maximum depth of .88m. The average hazard and velocity on site during the 0.1% AEP event are shown to be 1.05 ‘danger to some’ and 0.6m/s.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with a flow path from north to southwest, along the western and northern boundaries with moderate depths (averaging 0.41m in the 0.1% AEP event). It is evident that as the flooding extent increases between the 3.33% AEP and 1% AEP events, the average flood depth decreases. The maximum flood depth in the 0.1% AEP plus 65% climate change event is shown to be 1.6m along the western boundary of the site. The average velocity is shown to be no more than 0.83m/s, with a maximum velocity of 2.85m/s during the 0.1% AEP event with 65% climate change. The average hazard rating is 1.22 and is therefore stated to be a ‘danger to some’.

Groundwater

Groundwater levels on site are predominately shown to be at ‘low risk’. There is a small area in the northwestern corner where groundwater levels are modelled to be either at or very near (within 0.025m of) the ground surface or between 0.025m and 0.5m during a 1% AEP groundwater flood event. Flow paths would be expected to follow the topography of the site and be similar to surface water flow paths.

Key points and constraints from SFRA Level 2

Available access and egress with depths up to 0.22m along Long Lane.

17% located within surface water flood risk during the 0.1% AEP extent and 26% within 0.1% AEP plus 65% climate change.

No identified sewer, reservoir, tidal or fluvial flood risk and is not located within an area of flood warning and alerts, Critical Drainage Area or Groundwater Source Protection Zone.

The site is located within a Nitrate Vulnerable Zone.

[74] ccf-003-appendix-a1-gh-ed-43-site-report.pdf

Local Plan Policy

Strategic Policy WS06: Employment land east of airport

An area of 24.34 hectares of land east of existing airport buildings and lying either side of Long Lane, is allocated for employment uses (GH/ED/43 and GH/ED/45 and Rock_09a). The site will form a mixed-use business park and the following uses will be considered appropriate:

A. B2 (general industrial);

B. B8 (storage and distribution);

C. E(g) (Uses which can be carried out in a residential area without detriment to its amenity:

1. Offices to carry out any operational or administrative functions,

2. Research and development of products or processes;

3. Industrial processes;

D. A limited element of ancillary uses such as indoor sports, recreational or café will be permitted but only where strictly supporting and subordinate to the development of the above employment uses;

E. With its proximity to Exeter Airport the site is well positioned to assist the role of the airport. Uses which relate to the aviation sector and its wider supply chain will be particularly supported alongside other high value employment uses that facilitate economic growth within the area.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The masterplan must include measures to provide fully for infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan. The masterplan will need to demonstrate that the following will also be achieved/undertaken:

F. Traffic mitigation to avoid additional traffic negatively impacting on the operation of the local highway network in particular the Long Lane B3184 Intersection;

G. Safe cycle and pedestrian access to nearby facilities and enhancement of public transport accessibility;

H. Protection of the County Wildlife Site;

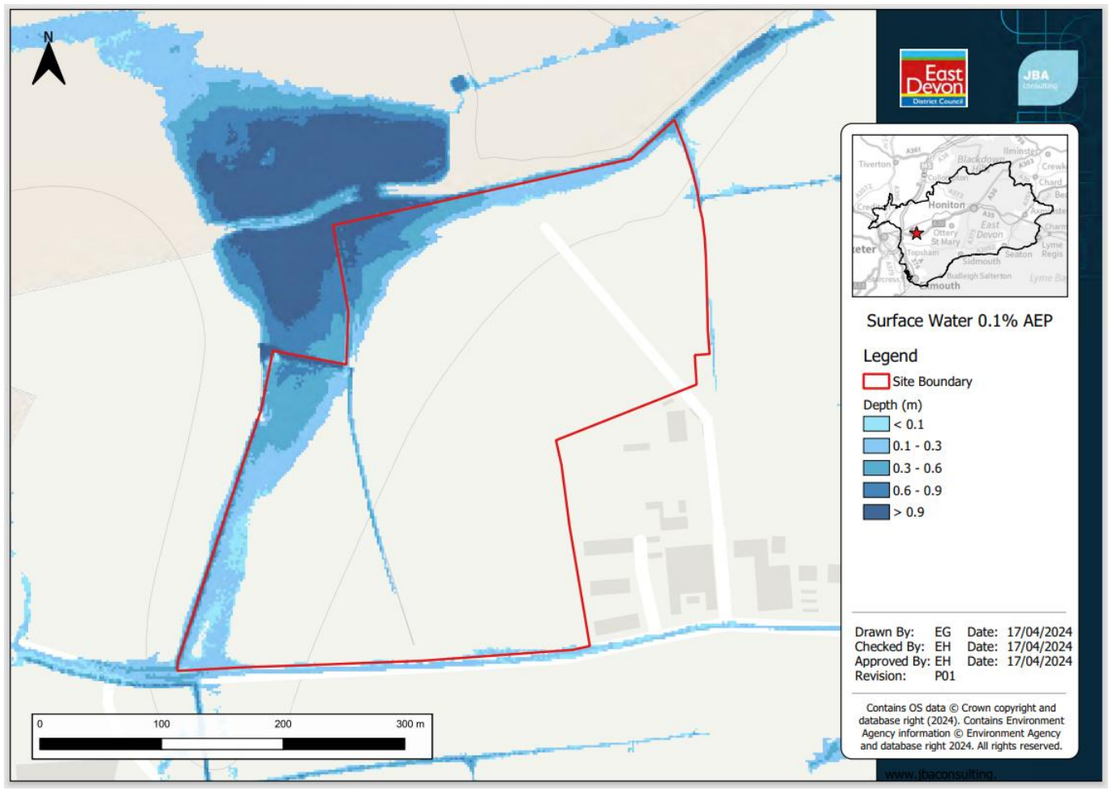
I. Archaeological assessment to ensure that any impact on the historic WWII airfield is minimised and mitigated;

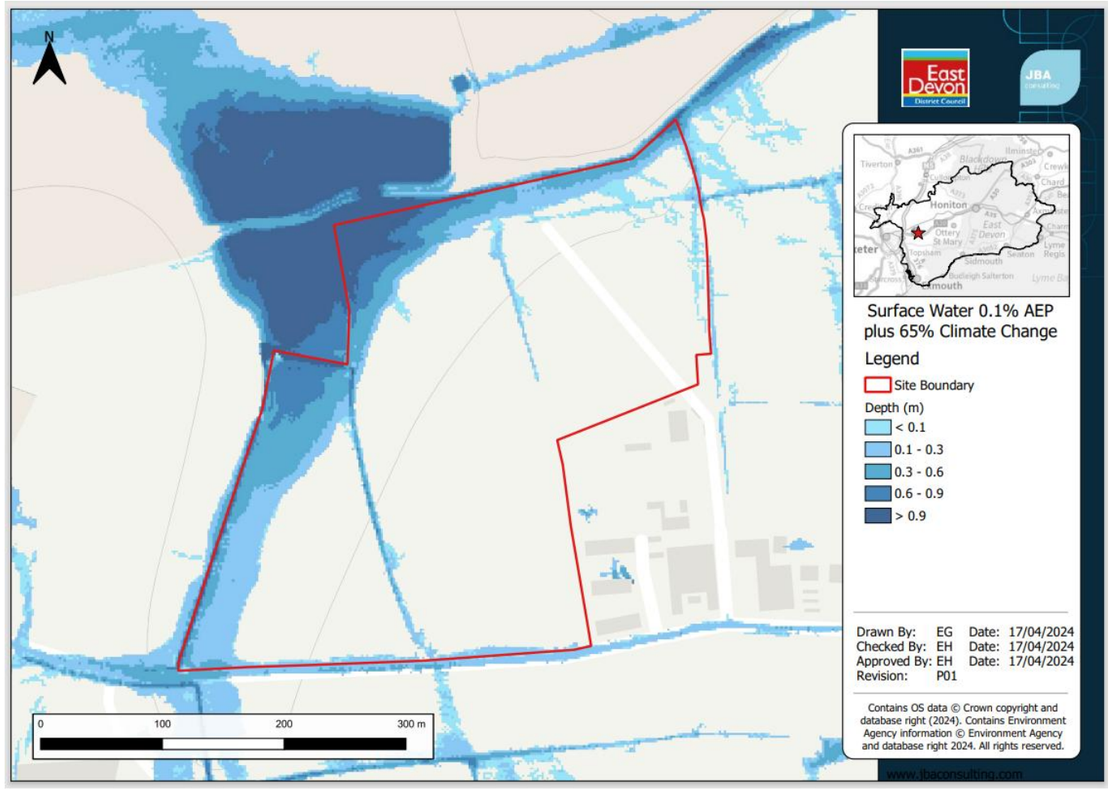
J. Heritage impact assessment and mitigation taking account of nearby heritage assets (including Grade I listed Rockbeare Manor and its associated Grade II Registered Historic Park and Garden) with careful consideration of setting, building height, design, and landscaping;

K. A comprehensive site-specific Flood Risk Assessment is to be undertaken to assess the risk of surface water and groundwater flooding in relation to the proposed development, and the access and egress arrangements and development should be placed outside of the areas at risk from surface water flooding;

L. Infiltration rates are to be assessed on site as part of a drainage strategy and there is to be early engagement with the Lead Local Flood Authority and the Environment Agency on the proposed sustainable drainage system measures and infiltration rate.

Selected Maps[75]





[75] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Sequential test

To pass the Sequential Test, it must be shown that there are no reasonably available sites in the western part of East Devon that are in areas with a lower probability of flooding that would be appropriate to accommodate the proposed strategic employment uses (taking into account wider sustainable development objectives).

This site forms part of a strategic scale employment site that will provide a business park focussed on airport-related and clean green technology uses. It is required to support airport-related and aeronautical business activities that will promote high-skilled, high-quality green jobs. The site's proximity to the airport and other development sites enhances its attractiveness for businesses and educational establishments so that very close proximity to the airport is essential. No alternative sites suitable for the proposed use are available.

Most of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas. This is helped by the site being part of a wider allocation, where the other parcels of land are at less risk of flooding. The SFRA L2 notes that Implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity, helping meet requirements for the Nitrate Vulnerable Zone. This could provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that, given the site is in Flood Zone 1, and the limited surface water extent in the 0.1% AEP event, provided development is proposed outside of the areas at risk, the Exception Test is not required for this site.

27 Appendix S Sequential Test - Employment land at Darts Farm, North of Topsham Road (Clge_23a)

Summary

Sequential test – passed.

Exception test – not required subject to development being outside of the areas at risk.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[76], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site has not been identified to be in an area at risk of fluvial flooding.

Surface water

The site is not shown to be at risk of flooding in the 3.3% AEP event, with less than 1% at risk of flooding in the 1% AEP event. The average flood depth in this southwestern corner of the site is shown to be 0.11m. During the 0.1% AEP event a flow path crosses the site from the east to the southwest, with predominantly shallow depths (averaging 0.1m). It is therefore evident that as the flooding extent increases, the average flood depth decreases. The average hazard and velocity on site during the 0.1% AEP event are shown to be 0.61 '(caution') and 0.65m/s respectively.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with a flow path in a south-westerly direction, with predominantly shallow depths (averaging less than 0.15m). The maximum flood depth in the 0.1% AEP plus 65% climate change event is shown to be 0.55m in the southwestern corner of the site. The average velocity is shown to be no more than 0.91m/s, with a maximum velocity of 2.69m/s during the 0.1% AEP event with 65% climate change. The average hazard rating is 0.73 and is therefore stated to be a 'caution'.

Groundwater

During the 1% AEP groundwater flood event, groundwater levels on site are modelled to be predominantly between0.025m and 0.5m below the ground surface to the east of the site with localised areas at or very near (within 0.025m of) the ground surface. Flow paths would be expected to follow the topography of the site and be similar to surface water flow paths. To the west of the site groundwater levels are between 0.5m and 5m below the ground surface. The risk of groundwater flooding will require further consideration in a sitespecific flood risk assessment.

Key points and constraints from SFRA Level 2

Flood free access and egress along Topsham Road. 2

7% located within surface water flood risk during the 0.1% AEP extent and 60% within 0.1% AEP plus 65% climate change.

No identified sewer, reservoir, tidal or fluvial flood risk and is not located within an area of flood warning and alerts, Critical Drainage Area or Groundwater Source Protection Zone.

The site is located within a Nitrate Vulnerable Zone.

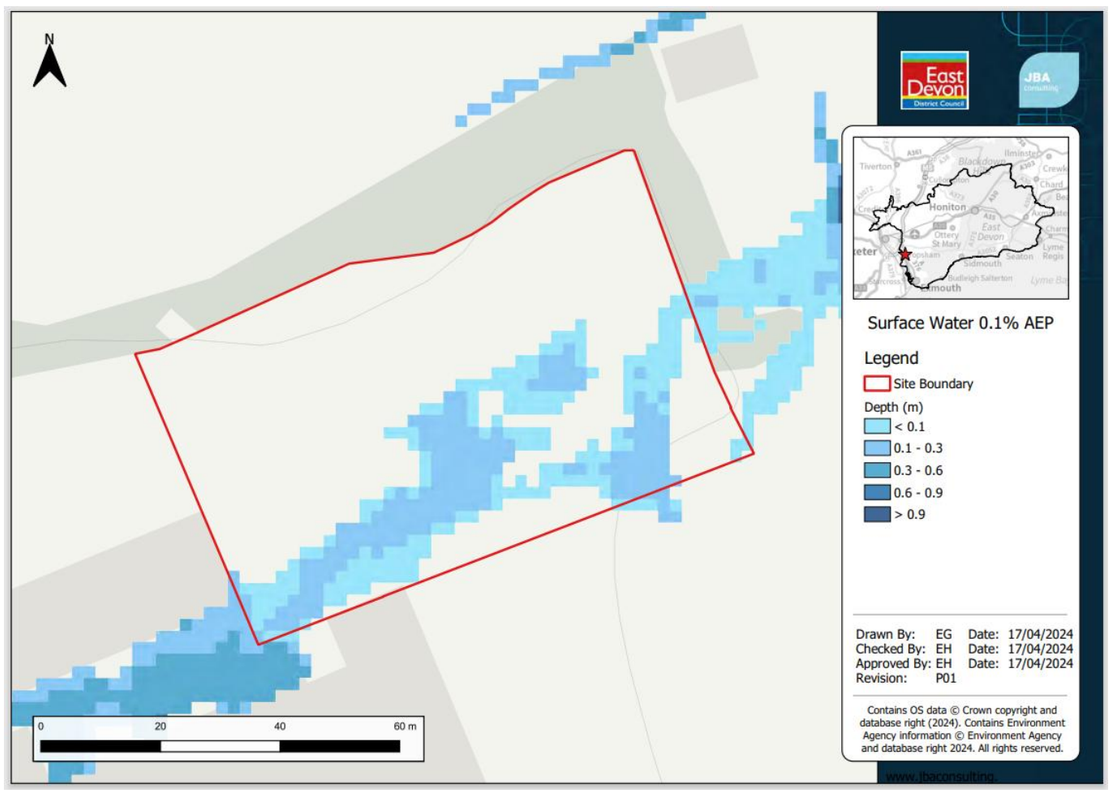
[76] ccf-003-appendix-a1-clge_23-site-report.pdf

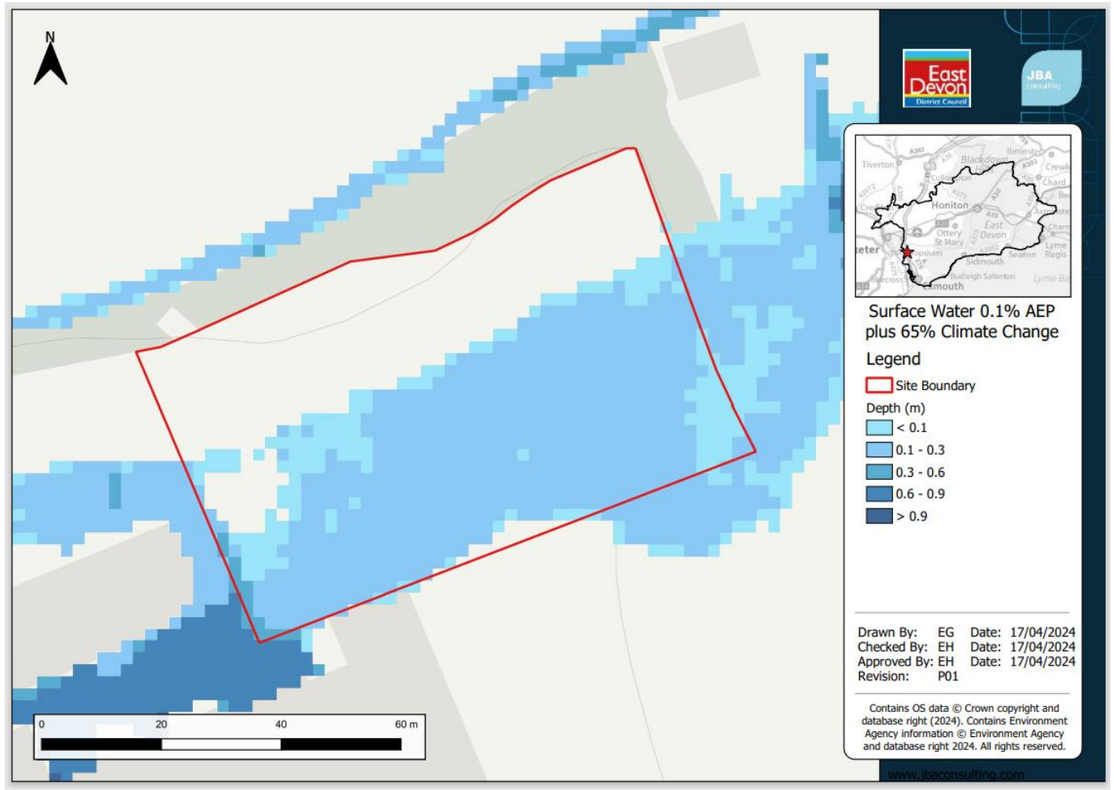
Local Plan Policy

Strategic Policy WS15: Employment land at Darts Farm. An area of 2.13 hectares of land, as shown on the Policies Map, is allocated for small business units in Use Class E(g) for the manufacture or processing of locally grown food and drink products (Clge_23a and Clge_25a).

Road access for this allocation will most likely need to be through the main Darts Farm access, with the likelihood of highway improvements being needed, and development proposals will be required to demonstrate that this can be achieved safely and without detriment to the existing commercial activities and car parking provision on the wider site. The developer may also be required to contribute towards localised mitigation on the highway network. Archaeological assessment will be required prior to development commencing. A site-specific FRA will be required to assess the risk of surface water and groundwater flooding in relation to the proposed development, and development should be placed outside of the areas at risk from surface water flooding. Infiltration rates will need to assessed on site as part of a drainage strategy. Noting that the site is located within a Nitrate Vulnerable Zone, Impact Risk Zone for the Exe Estuary SPA may be triggered if there is any discharge of water or liquid waste that is discharged to ground or to surface water. If the development will affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA will be required.

Selected Maps[77]





[77] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Sequential test

To pass the Sequential Test, it must be shown that there are no reasonably available sites in the western part of East Devon that are in areas with a lower probability of flooding that would be appropriate to accommodate the proposed strategic employment uses (taking into account wider sustainable development objectives).

This site is allocated for small business units to complement the adjoining retail use, add value to locally produced goods, and meet an identified need in the District. Darts Farm, a popular shopping centre, and Clge_23a forms part of a wider allocation on adjacent land that is allocated for employment use. Very close proximity to the existing food hub at Darts Farm is essential and there are no alternative sites available.

Much of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity, helping meet requirements for the Nitrate Vulnerable Zone. This could provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that, The NPPF classifies the usage as “Less Vulnerable” and that, given the site is in Flood Zone 1, provided development is proposed outside of the areas at risk of surface water flooding, the Exception Test is not required for this site.

28 Appendix T Sequential Test - Employment land opposite airport buildings, south of A30 (Farr_01)

Summary

Sequential test – passed.

Exception test – not required subject to development being outside of the areas at risk.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[78], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site has not been identified to be in an area at risk of fluvial flooding.

Surface water

The site is not shown to be at risk of flooding in the 3.33% AEP event, with 1% of the site at risk of flooding in the 1% AEP event. The average flood depth in the 1% AEP event is shown to be 0.28m. During the 1% and 0.1% AEP events two localised areas flood in the east and northwest of the site, with flood extents increasing in the 0.1% AEP event, with predominantly shallow depths (averaging 0.33m in the 0.1% AEP event). The average hazard and velocity on site during the 0.1% AEP event are shown to be 0.98 ‘danger to some’ and 0.17m/s respectively.

Surface water plus climate change

The site is not shown to be at risk of flooding in the 3.33% AEP event, with 1% of the site at risk of flooding in the 1% AEP event. The average flood depth in the 1% AEP event is shown to be 0.28m. During the 1% and 0.1% AEP events two localised areas flood in the east and northwest of the site, with flood extents increasing in the 0.1% AEP event, with predominantly shallow depths (averaging 0.33m in the 0.1% AEP event). The average hazard and velocity on site during the 0.1% AEP event are shown to be 0.98 ‘danger to some’ and 0.17m/s respectively.

Key points and constraints from SFRA Level 2

Flood free access and egress along the B3184.

11% located within surface water flood risk during the 0.1% AEP extent and 24% within 0.1% AEP plus 65% climate change.

No identified sewer, reservoir, tidal or fluvial flood risk and is not located within an area of flood warning and alerts, Critical Drainage Area or Groundwater Source Protection Zone.

The site is located within a Nitrate Vulnerable Zone.

[78] ccf-003-appendix-a1-farr_01-site-report.pdf

Local Plan Policy

Strategic Policy WS08: Employment land opposite airport buildings, south of A30. An area of 1 hectare of land, as shown on the Policies Map, is allocated for small business units (Farr_01).

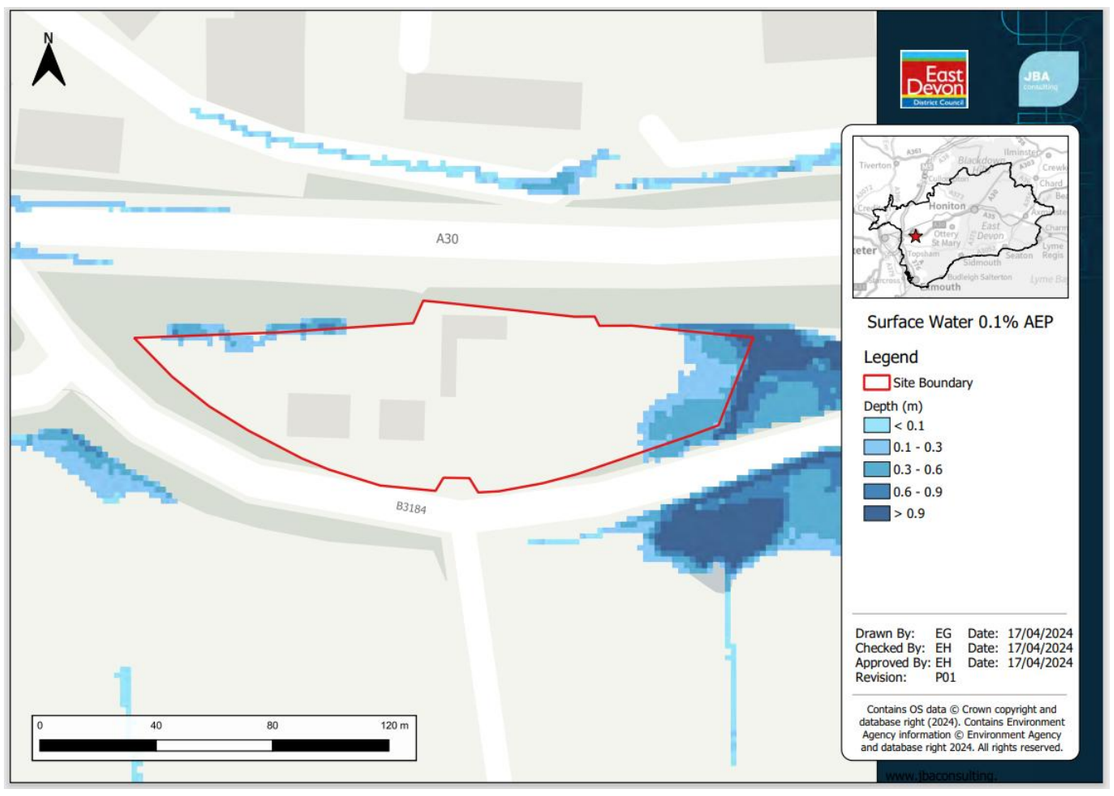
The following uses will be considered appropriate;

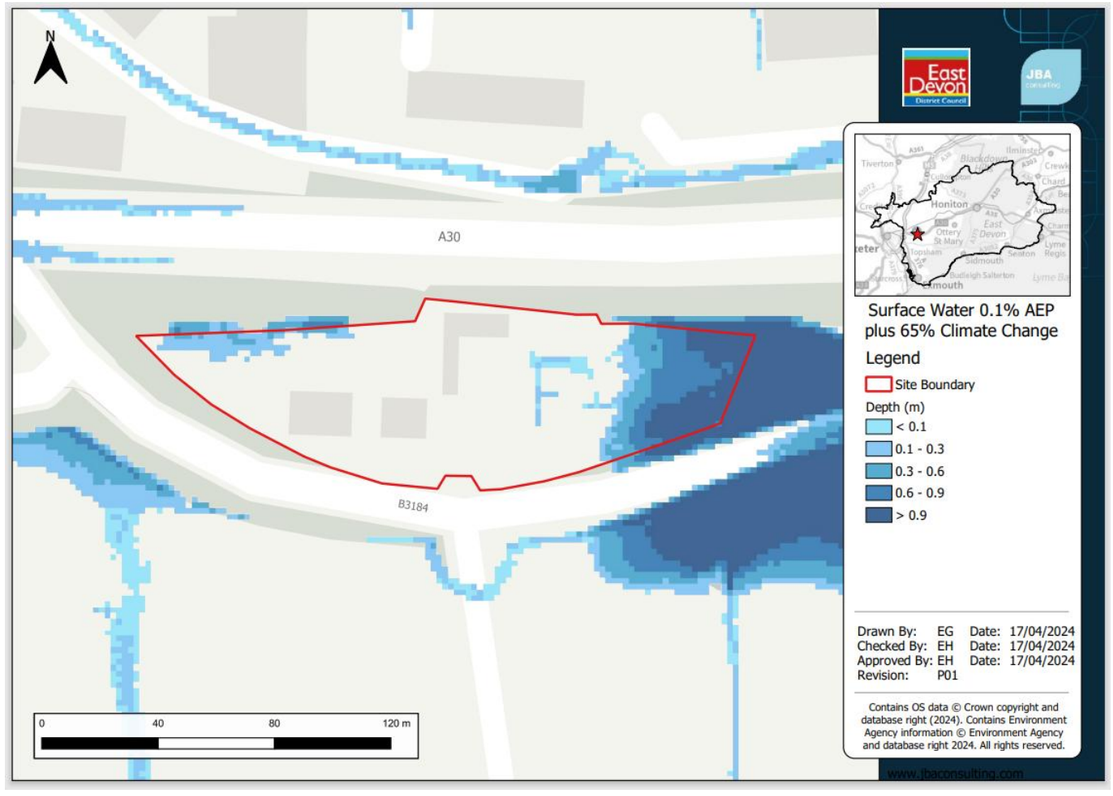
A. B2;

B. E(g).

Archaeological assessment will be required prior to development. Site-specific Flood Risk Assessment is required and development should be placed outside of the areas at risk from flooding. This site will require private sewage/drainage measures and infiltration rates must be assessed on site as part of a drainage strategy.

Selected Maps[79]





Sequential test

[79] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

To pass the Sequential Test, it must be shown that there are no reasonably available sites in the western part of East Devon that are in areas with a lower probability of flooding that would be appropriate to accommodate the proposed strategic employment uses (taking into account wider sustainable development objectives).

The site comprises previously developed land in the form of buildings and hard standings that were designed for agricultural purposes but were separated from the related holding when the A30 was built and have subsequently been used for a range of purposes.

This site is specifically allocated for small business or start-up units to offer flexibility and meet the need for smaller, less expensive premises not otherwise available in this area. Occupiers may provide supporting services to nearby residents and businesses at the airport. There are no other sites suitable for this use in the area.

Much of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity, helping meet requirements for the Nitrate Vulnerable Zone. This could provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that, given the site is in Flood Zone 1, and the limited surface water extent in the 0.1% AEP event, provided development is proposed outside of the areas at risk, the Exception Test is not required for this site.

29 Appendix U Sequential Test - Employment land adjoining Darts Farm Clge_25a

Summary

Sequential test – passed.

Exception test – not required subject to development being outside of the areas at risk due to its location within Flood Zone 1, with a limited surface water extent.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[80], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site has not been identified to be in an area at risk of fluvial flooding.

Surface water

Flooding during the 3.3% and 1% AEP events is shown to be localised, with a small area of flooding to the southwest of the site, with an additional area during the 1% AEP to the south. The flood extent is shown to increase to 14% during the 0.1% AEP event connecting the two localised areas into a flow path crossing the south of the site from east to west. as the flood extent increases the mean flood depth on site decreases, due to decreased ponding. The mean depth, velocity and hazard within the 0.1% AEP event are shown to be 0.15m, 0.85m/s and 0.73 (a 'Caution') respectively.

The superseded RoFSW dataset used in this assessment has been compared with the March 2025 NaFRA2 dataset. The flood extent is shown to be similar to the 0.1% AEP event for both datasets, with similar proportional percentages below, however the 2025 dataset shows an additional area at risk of surface water flooding in the centre of the site, extending from the existing flow path to the north of the site.

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with flooding in two localised areas to the south of the site during the 3.3% and 1% AEP plus climate change events. Flooding increases during the 0.1% AEP plus climate change event connecting as a flow path from east to west, with an additional branch of flooding flowing north. This additional branch is also shown within the new NaFRA2 dataset. The mean depth is shown to be 0.16m in the 0.1% AEP event plus 65% climate change. The average velocity on site is 1.14 m/s, with a maximum of 2.36m/s. The average hazard rating during the 1% AEP plus 65% climate change event is 0.8 and is therefore stated to be a 'danger to some'.

Groundwater

Groundwater levels on site are shown to be between 0.025m and 0.5m below the grounds surface during a 1% AEP groundwater flood event. A small pixelized area is shown to be located either at or very near (within 0.025m of the grounds surface) to the northwest of the site. In these instances, where groundwater levels are close to the ground surface, there is a significant risk of groundwater emergence during a flood event. Subsurface development or development requiring deep foundations run the risk of interfering with groundwater levels by displacing water. There is a requirement for site-specific flood risk investigations to determine the groundwater risk at the site through ground investigations and to demonstrate that proposed development will not impact the risk posed within or surrounding the site. Site-specific FRAs should assess the suitability of Sustainable Drainage Systems (SuDS) within the areas at potential risk of groundwater emergence.

Key points and constraints from SFRA Level 2

[80] CCF-003 SFRA Level 2 Appendix A Site Reports Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Access and egress to Darts Farm is shown to be largely unaffected during all assessed events, with depths of up to 0.1m across the site entrance to the east of the Darts Farm car park during the 1% AEP plus climate change surface water modelling.

The maximum hazard rating identified on site within the 0.1% AEP plus 65% climate change surface water flooding extent is shown to be a 'Danger to all', however the mean hazard is shown to be a 'Danger to some'. The majority of the site is not shown to be at risk of flooding.

No identified sewer, reservoir, tidal or fluvial flood risk and is not located within an area of flood warning and alerts, Critical Drainage Area or Groundwater Source Protection Zone.

The site is located within a Nitrate Vulnerable Zone.

Local Plan Policy

An area of 2.13 hectares of land, as shown on the Policies Map, is allocated for small business units in Use Class E(g) for the manufacture or processing of locally grown food and drink products (Clge_23a and Clge_25a).

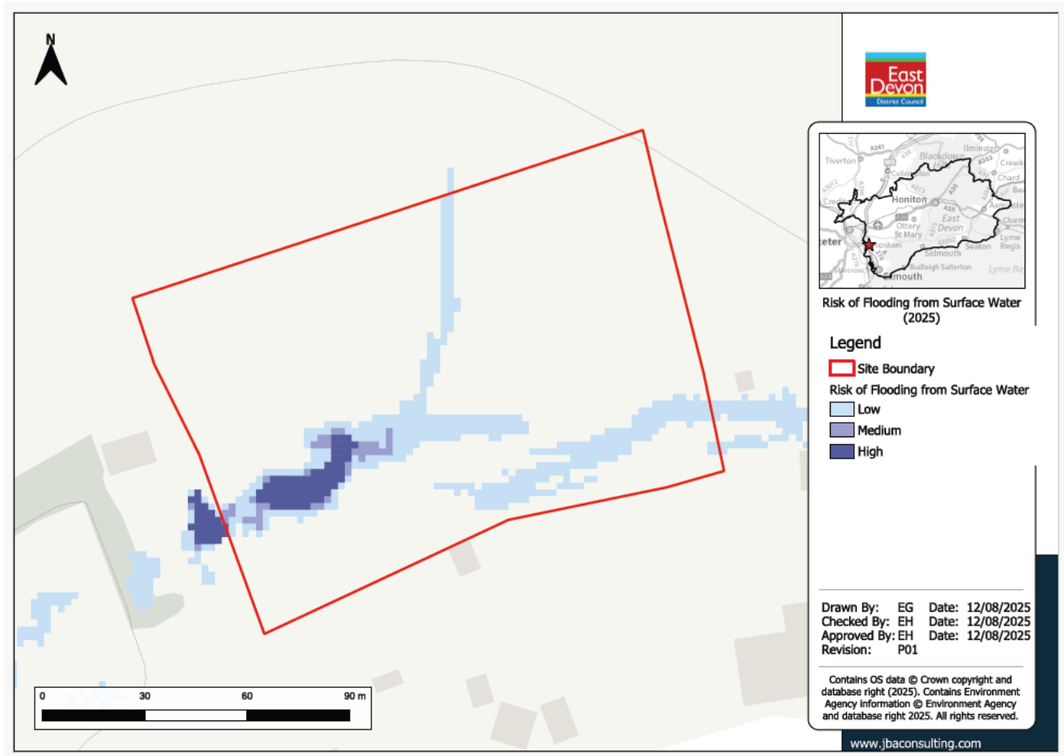
Road access for this allocation will most likely need to be through the main Darts Farm access, with the likelihood of highway improvements for pedestrian and vehicular access being needed, and development proposals will be required to demonstrate that this can be achieved safely and without detriment to the existing commercial activities and car parking provision on the wider site. The developer may also be required to contribute towards localised mitigation on the highway network.

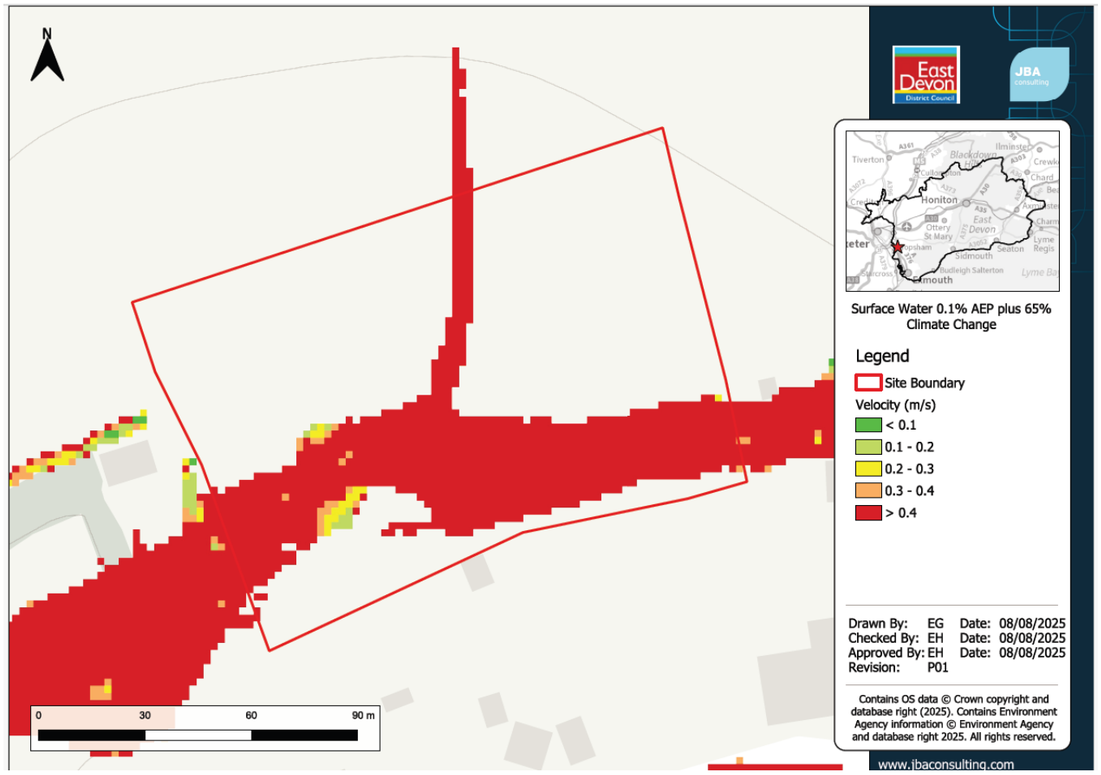
Archaeological assessment will be required prior to development commencing.

A site-specific FRA will be required to assess the risk of surface water and groundwater flooding in relation to the proposed development, and development should be placed outside of the areas at risk from surface water flooding. Infiltration rates will need to assessed on site as part of a drainage strategy. Noting that the site is located within a Nitrate Vulnerable Zone, Impact Risk Zone for the Exe Estuary SPA may be triggered if there is any discharge of water or liquid waste that is discharged to ground or to surface water. If the development will affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA will be required.

Selected Maps[81]

[81] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon





To pass the Sequential Test, it must be shown that there are no reasonably available sites in the western part of East Devon that are in areas with a lower probability of flooding that would be appropriate to accommodate the proposed strategic employment uses (taking into account wider sustainable development objectives).

This site is allocated for small business units to complement the adjoining retail use, add value to locally produced goods, and meet an identified need in the District. Darts Farm, a popular shopping centre, and Clge_25a forms part of a wider allocation on adjacent land that is allocated for employment use. Very close proximity to the existing food hub at Darts Farm is essential and there are no alternative sites available.

Much of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas.

The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that, given the site is in Flood Zone 1, and the limited surface water extent in the 0.1% AEP event, provided development is proposed outside of the areas at risk, the Exception Test is not required for this site.

30 Appendix V Sequential Test - Land to north (Phase 1) of Exeter International Airport Chlo_09

Summary

Sequential test – passed.

Exception test – not required provided development is proposed outside of the areas at risk as the site use is classified as Less Vulnerable.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[82], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at medium risk due to the location of the unnamed watercourse flowing through the site boundary, effecting both fluvial and surface water flooding extents.

Fluvial

The site is shown to be entirely located within Flood Zone 1 of the Flood Map for Planning released in March 2025. However, the watercourse flowing through the site is not represented within the Flood Map for Planning due to its small catchment size. The Exeter Skypark modelling has therefore been used to assess the fluvial flood risk to the site.

The site is shown to flood during all three events, along the unnamed watercourse. In the 3.3% AEP event, the majority of flooding is shown to follow the watercourse, with flooding extending across topographical depressions to the west and south of the south of the site, covering 12%. Flood extents increase to 31% during the 0.1% AEP event, covering a significant portion of the south of the site. The mean depth, velocity and hazard during the 0.1% AEP event is shown to be 0.17m, 0.23m/s and 0.32 (a 'Caution') respectively.

Fluvial plus climate change

Flooding is shown to follow the unnamed watercourse across all climate change events, increasing in extent across the western/southern portion of the site from 22% up to 29%. The mean depth, velocity and hazard during the 0.1% AEP event is shown to be 0.16m, 0.21m/s and 0.31 (a 'Caution') respectively.

Surface water

The Risk of Flooding from Surface Water dataset shows that flooding is shown to increase from 5% to 25% across the site. Flooding is predominantly shown to flow along the watercourse, with a small area of flooding across the centre of the site during the 3.3% AEP event. The flood extent is shown to increase quite significantly during the 0.1% AEP event with flow paths crossing the centre and southern portions of the site from east to west. The mean depth, velocity and hazard during the 0.1% AEP event is shown to be 0.23m, 0.55m/s and 0.85 (a 'Danger to some') respectively.

Within the Skypark modelling it is evident that the average flood risk is identified to be significantly lower than the superseded Risk of Flooding from Surface Water mapping. It should however be noted that the maximum depth, hazard and velocity is identified to be more significant in both the 3.3% and 1% AEP events. The flood extent is shown to be similar to the Risk of Flooding from Surface Water dataset, predominantly following the watercourses across the site, with additional shallow coverage scattered across the site. The mean depth, velocity and hazard during the 1% AEP event is shown to be 0.05m, 0.07m/s and 0.08 (a 'Caution') respectively.

The superseded RoFSW dataset used in this assessment has been compared with the March 2025 NaFRA2 dataset. The flood extent is shown to be similar to the 0.1% AEP event for both datasets, with similar proportional percentages below, however the 2025 dataset shows a larger percentage at risk of surface water flooding during the 3.3% and 1% AEP events with slightly wider flow paths.

- 3.3% AEP – 12%
- 1% AEP – 18%

[82] CCF-003 SFRA Level 2 Appendix A Site Reports Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

- 0.1% AEP - 35% Surface water

Surface water plus climate change

The Environment Agency Risk of Flooding from Surface Water dataset shows flooding to cross the site from east to west and predominantly follow the watercourses, with associated ponding covering 13%. The flood extent is shown to significantly increase during the 0.1% AEP plus climate change event to cover 54% of site, with flow paths covering the majority of the site. The mean depth, velocity and hazard is shown to be 0.27m, 0.78m/s and 1.02 (a 'Danger to some') respectively.

During the Skypark surface water modelling, flooding extents remain similar, with significantly smaller average depths, velocities and hazards. The maximum values are however shown to be greater. The mean depth, velocity and hazard during the 1% AEP plus climate change event is shown to be 0.06mm, 0.09m/s and 0.1 (a 'Caution') respectively.

Groundwater

Groundwater levels on site are shown to be 'low risk' to the north and across the centre of the site, with levels predominantly shown to be between 0.025m and 0.5m below the grounds surface. Small, localised areas are shown to contain ground levels either at or very near (within 0.025m of the grounds surface) to the west and across the southern portion of the site during a 1% AEP groundwater flood event.

In these instances, where groundwater levels are close to the ground surface, there is a significant risk of groundwater emergence during a flood event. Subsurface development or development requiring deep foundations run the risk of interfering with groundwater levels by displacing water. There is a requirement for site-specific flood risk investigations to determine the groundwater risk at the site through ground investigations and to demonstrate that proposed development will not impact the risk posed within or surrounding the site. Site-specific FRAs should also assess the suitability of SuDS within the areas at potential risk of groundwater emergence.

Access and egress

Access and egress is unlikely to be possible due to significant flood depths (up to 400mm and 600mm) along the entrance to the site during the 1% AEP plus climate change surface water and fluvial events respectively. Access and egress may be possible to the south of the site off the former runway, however flood depths bisecting the centre of the site restrict access. The maximum hazard rating identified on site is shown to be a 'Danger to all', however the mean hazard is shown to be a 'Danger to some' covering the western and southern portions of the site.

Access and egress should be assessed in a site-specific assessment in relation to the proposed development and a Flood Response Plan should be developed.

Key points and constraints from SFRA Level 2

The site is generally identified to be at medium risk due to the location of the unnamed watercourse flowing through the site boundary, effecting both fluvial and surface water flooding extents. Development is likely to progress if:

- A site-specific FRA is undertaken to assess the risk of fluvial and surface water flooding in relation to the proposed development.
- Development is placed outside of the areas at risk from fluvial and surface water flooding.
- The extent of Flood Zone 3b will need to be confirmed during a site-specific assessment as development will not be permitted in this area.
- Infiltration rates are assessed on site as part of a drainage strategy.
- The risk of groundwater flooding should be considered within a site-specific assessment to determine the groundwater risk at the site through ground investigations and to demonstrate that proposed development will not impact the risk posed within or surrounding the site. Site-specific FRAs should also assess the suitability of SuDS within the areas at potential risk of groundwater emergence.
- There is early engagement with the LLFA and the Environment Agency on the proposed SuDS measures and infiltration rate to discuss requirements on the site meeting relevant conditions due to the sites location within a Nitrate Vulnerable Zone and the location of the fire station.
- Cumulative Impact Assessment policy documents must be understood, and the cumulative impact of development should be considered.

- Consideration is given to the safe access and egress to the site during the design flood event. A Flood Response Plan should be prepared in line with ADEPT guidance

Local Plan Policy

An area of 15.3 hectares of land, as shown on the Policies Map to the north of the airport, is allocated for employment uses (Clho_09). The following uses will be considered appropriate;

A. The majority (or all) to be B2 (General industrial);

B. With the remainder (if any) B8 and E(g).

The development will need to come forward in accordance with an approved phasing plan and promote active travel measures and other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business uses.

Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements and a new access onto London Road capable of safely accommodating the level of traffic likely to be generated when the site is at capacity.

This allocation will need to be supported by further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved.

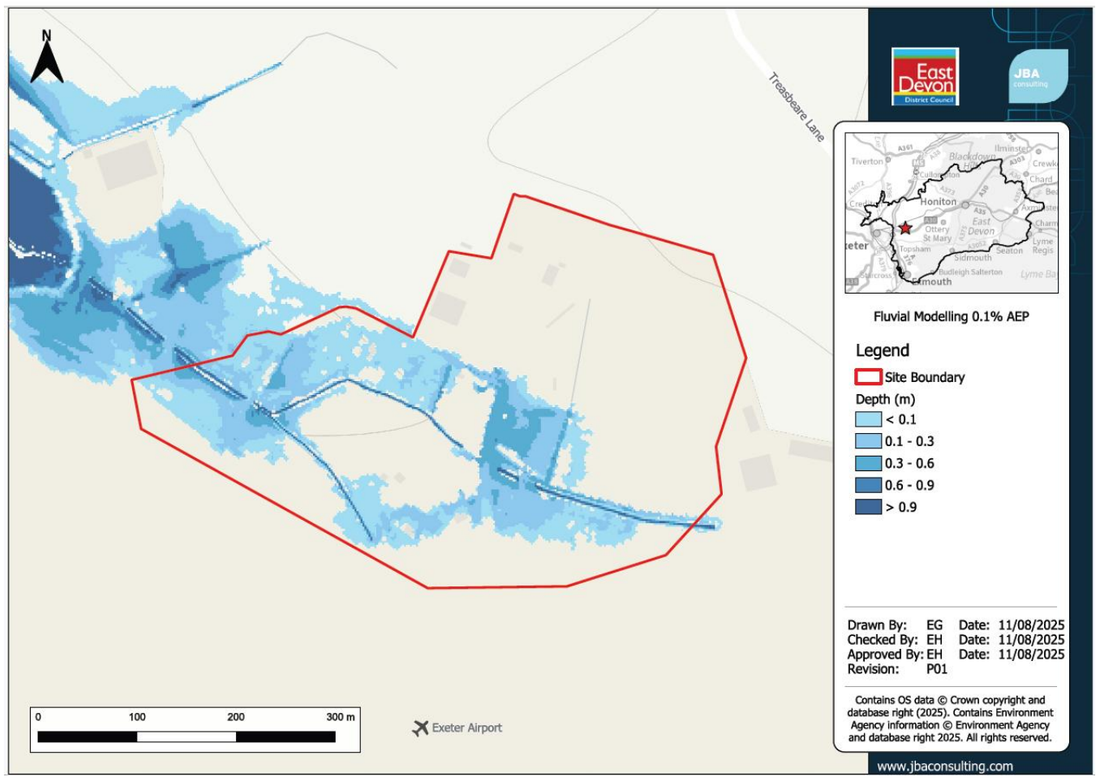
Archaeological assessment will be required prior to development commencing to ensure that any impact on the historic WWII airfield is minimised and mitigated.

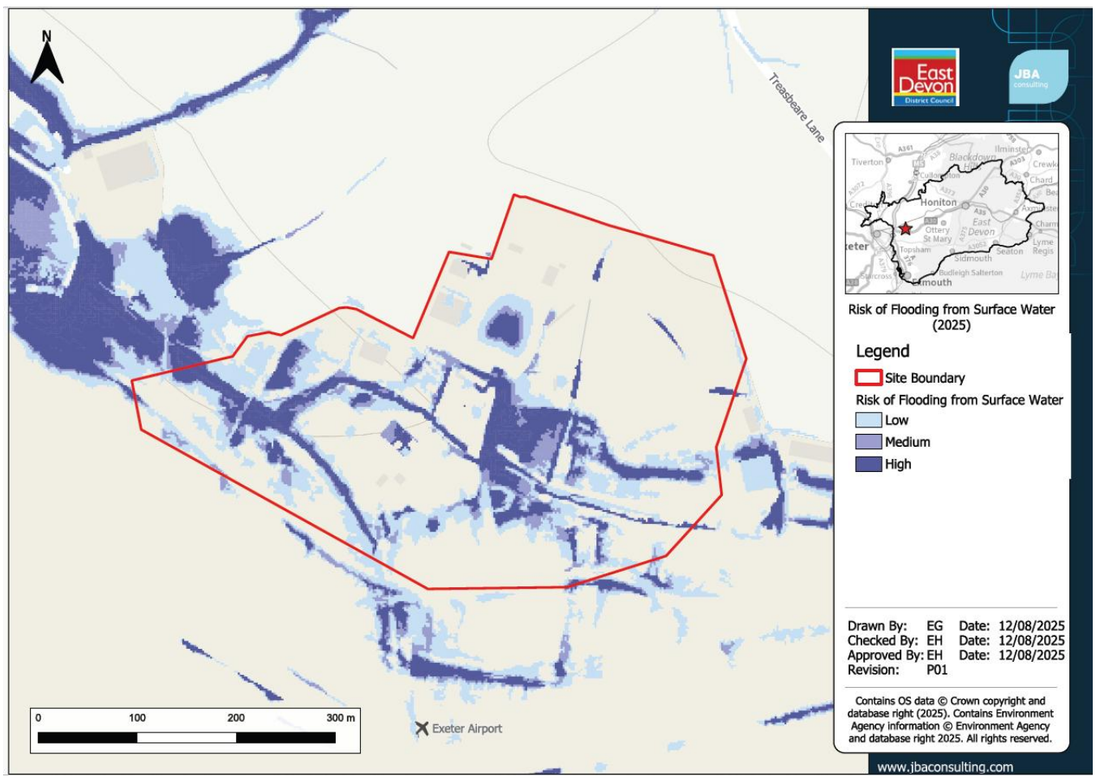
Heritage impact assessment and mitigation will be required, taking account of nearby designated and non-designated heritage assets (including Grade II listed Treasbeare Farmhouse) with careful consideration of setting, building height, design, and landscaping

This policy does not apply in the Cranbrook Plan area.

Selected Maps[83]

[83] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon





To pass the Sequential Test, it must be shown that there are no reasonably available sites in the western part of East Devon that are in areas with a lower probability of flooding that would be appropriate to accommodate the proposed strategic employment uses (taking into account wider sustainable development objectives).

This site is allocated mainly for general business uses with, possibly, some B8 and E(g) uses. Four employment sites near to Exeter Airport were considered in the sustainability appraisal[84]. Three of these were allocated and one site was rejected due to impacts on heritage assets (GH/ED/66). Clho_09 was preferred as it is well located to recent and planned development as part of the expansion of Cranbrook with facilities reasonably close to the site and few constraints to development. Clho_09 is a strategic allocation to provide for the types of general industrial and logistic uses that aren't planned for through the other strategic allocations and allocations that meet the need for settlement self-containment. These are generally light industrial due to close proximity to housing, expansion of existing businesses on small sites, clean-growth/aviation technology type uses and small business units. Clho_09 has capacity for large scale, general industrial and logistic use which require a location away from housing and close to major roads, for which there are no suitable alternative sites.

The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

[84] csd-003-sustainability-appraisal.pdf

Exception test

The SFRA L2 advises that, provided development is proposed outside of the areas at risk, the Exception Test is not required for this site as the site use is Less Vulnerable.

31 Appendix W Sequential Test - Land at Meeting Lane, Lympstone GH_ED_72a

Summary

Sequential test – passed.

Exception test – the SFRA L2 advises that the Exception Test is not required as the entire proposed development site is located within Flood Zone 1, although there is some surface water flood risk.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[85], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk due to its location within Flood Zone 1, with a limited surface water extent.

Fluvial

The site has not been identified to be in an area at risk of fluvial flooding.

Surface water

During the 3.3% AEP event, 3% of the site is shown to be at risk of flooding, located in a localised depression along the northwestern site boundary. As the durations increase the flood extent is shown to increase in a southeasterly direction following a topographical valley, before extending out onto Meeting Lane to the east of the site and onto Nutwell Road flowing northwest across Nutwell Park during the 0.1% AEP event. The mean depth, velocity and hazard within the 0.1% AEP event are shown to be 0.2m, 0.75m/s and 0.81 (a 'Danger to some') respectively.

During a comparison with the March 2025 NaFRA2 dataset, the flow path is shown to be similar, extending from Nutwell Road to Meeting Lane, however the flood extent is shown to cover a much smaller proportion of the site.

- 3.3% AEP – 4%
- 1% AEP – 4%
- 0.1% AEP - 8%

Surface water plus climate change

The site is shown to be at risk of flooding in all scenarios with flooding extending from the northwest down to Meeting Lane in all events. The flood extent is shown to increase to 24% during the 0.1% AEP plus 65% climate change event with an average depth, velocity and hazard of 0.22m, 0.98m/s and 0.88 (a 'Danger to some') respectively.

Groundwater

Groundwater levels on site are shown to be 'low risk' across the development site, with a number of small pixels containing levels between 0.025m and 0.5m below the ground surface, along the northern boundary, during a 1% AEP groundwater flood event.

Access and Egress

[85] CCF-003 SFRA Level 2 Appendix A Site Reports Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Access and egress is shown to be largely unaffected during all assessed events, with depths of up to 0.25m along Meeting Lane to the southeast of the site during the 1% AEP plus climate change surface water modelling. It should be noted that a flow path is shown to bisect the site, which may cause access and egress issues between the northern and southern portions and should be investigated within a site-specific assessment during detailed design.

The maximum hazard rating identified on site within the 0.1% AEP plus 65% climate change surface water flooding extent is shown to be a 'Danger to most', however the mean hazard is shown to be a 'Danger to some'. The majority of the site is not shown to be at risk of flooding.

It may therefore be necessary that a Flood Response Plan is developed.

Key points and constraints from SFRA Level 2

The site is generally identified to be at low risk due to its location within Flood Zone 1, with a limited surface water extent. Development is likely to progress if:

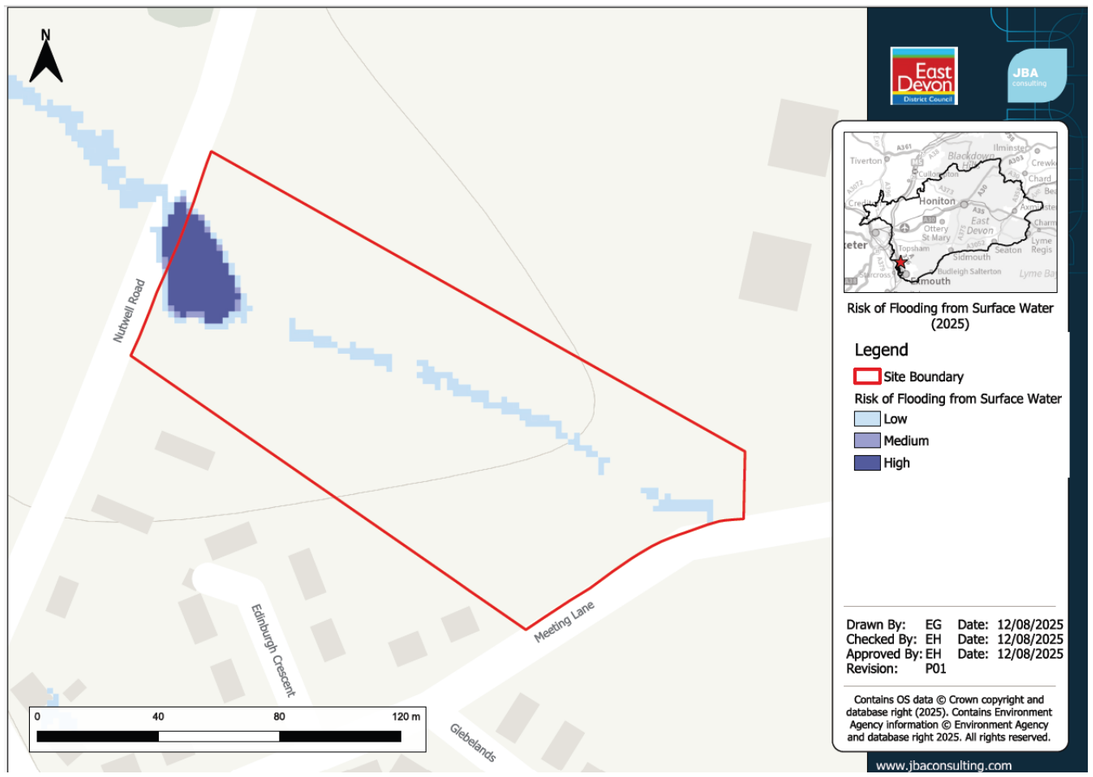
- Development is placed outside of the areas at risk from surface water flooding, and a site-specific FRA is undertaken to assess the risk of surface water flooding in relation to the proposed development.
- Infiltration rates are assessed on site as part of a drainage strategy.
- Consideration is given to the safe access and egress to the site during the design flood event. A Flood Response Plan could be prepared in line with ADEPT guidance.
- There is early engagement with the LLFA and the EA on the proposed SuDS measures and infiltration rate to discuss requirements on the site meeting relevant conditions due to the sites location within a Nitrate Vulnerable Zone.
- Cumulative Impact Assessment policy documents must be understood, and the cumulative impact of development should be considered.

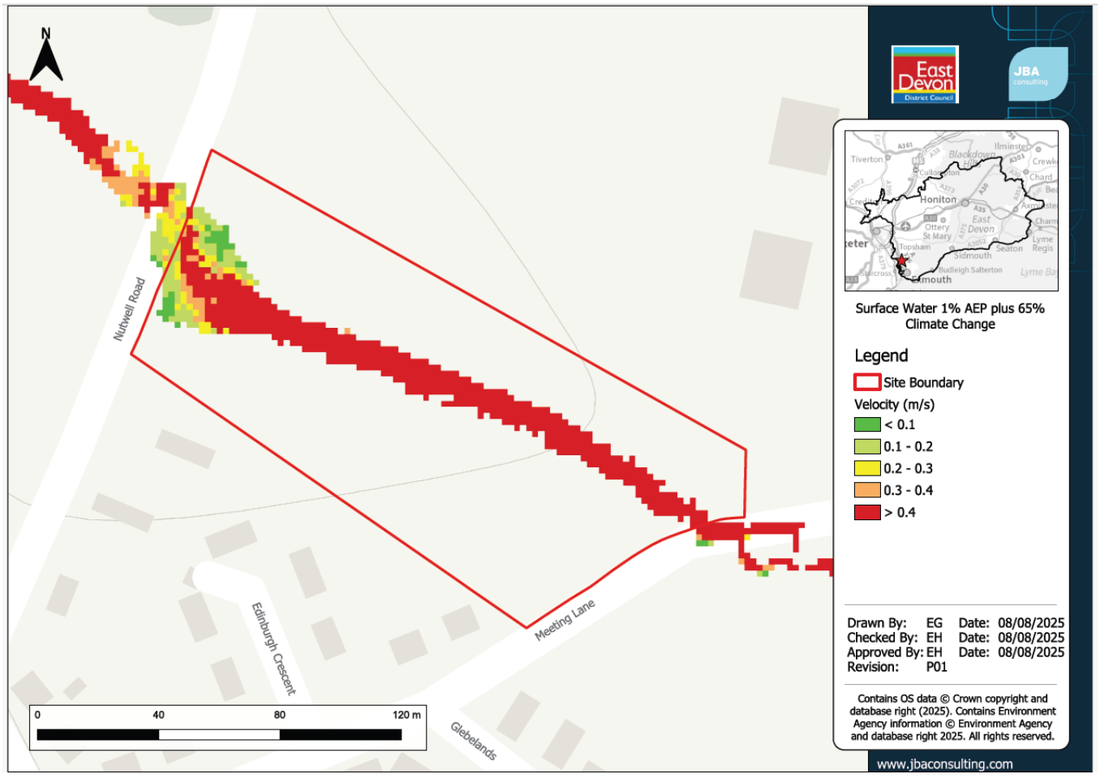
Local Plan Policy

This site is allocated for 42 new homes. Tree planting along the western and northern edge should be provided to mitigate the impact upon Nutwell Park. A pedestrian link should connect with the existing footpath on Meeting Lane to the south. Development should explore opportunities for localised improvements/contributions (e.g at the Exmouth Road/Meeting Lane intersection).

Selected Maps[86]

[86] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon





Sequential Test

To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Lympstone with a lower probability of flooding, taking into account wider sustainable development objectives.

Lympstone is a local centre where development that meets local needs and those in the immediate surroundings is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 4 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 3 sites are included as allocations. GH/ED/72b – Land at Meeting Lane is rejected due to adverse landscape impact, and adverse impact on the historic environment with 3x Grade II listed assets within 100m, and potential harm to Nutwell Court, an attractive parkland around a Grade II* country house adjacent to west boundary.

The total number of dwellings proposed at Lympstone is 92 which would result in a 10.4% increase in the number of homes in the village. This scale of growth is compatible with the plan strategy and makes use of the village's sustainable location with a station on the Exeter to London Waterloo railway.

Most of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas. The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could also provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The SFRA L2 advises that the Exception Test is not required as the entire proposed development site is located within Flood Zone 1, although there is some surface water flood risk.

32. Appendix X Sequential Test - Land west of Bramley Gardens, Whimple Whim_08

Summary

Sequential test – passed.

Exception test – the SFRA L2 advises that, providing development is proposed outside of the areas at risk of fluvial or surface water flooding, the Exception Test is not required for this site.

Description of flood risk.

This description is taken from the relevant detailed site summary sheet[87], which should be referred to for a fuller picture of flood risk on the site.

The SFRA L2 concludes that the site is generally identified to be at low risk.

Fluvial

The site is partially located within Flood Zone 2 across the centre of the site and within Flood Zone 3 along the western site boundary. The remainder (the majority) of the site is located within Flood Zone 1. As there is no detailed modelling available for this site, Flood Zone 3a has been used as a proxy for Flood Zone 3b. Detailed modelling should be undertaken as part of a detailed site-specific Flood Risk Assessment to define the extent of Flood Zone 3b. In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset (available prior to March 2025) has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment.

Surface water

In the absence of detailed modelling, the Risk of Flooding from Surface Water dataset (available prior to March 2025) has been used to assess the depth, hazard and velocity flood risk to the site, as extents are shown to be similar to the Flood Zones. Consideration should still be given to the Flood Zones and detailed modelling may be required within a site specific assessment. site, within a small topographical depression. The majority of the risk is shown to be along the western boundary along the drainage ditch. The extent of flood risk increases up to 13% during the 0.1% AEP event, as a connected flow path enters the site at the eastern boundary, and flows from the east to northwest, along a small topographical valley across the site. It should be noted that as the flood extent increases the mean flood depth on site decreases, due to decreased ponding. The mean depth, velocity and hazard within the 0.1% AEP event are shown to be 0.2m, 1.01m/s and 0.85 (a ‘danger to some’) respectively.

The superseded RoFSW dataset used in this assessment has been compared with the March 2025 NaFRA2 dataset. The flood extent is shown to be similar within the 0.1% AEP event, with no significant differences. The flow path is shown to be slightly different to the 3.3% and 1% AEP events, by extending across the centre of the site during all events.

- 3.3% AEP – 6%
- 1% AEP – 8%
- 0.1% AEP- 13%

Surface water plus climate change

The site is shown to be at risk of flooding in all three scenarios with flooding along the western boundary and across the centre of the site. A surface water flow path is shown to cross the site from northwest to east, increasing in extent throughout the AEP events. The mean depth is shown to be 0.23m in the 0.1% AEP event plus 65% climate change. The average velocity on site is 1.34 m/s, with a maximum of 4.36m/s. The average hazard rating during the 1% AEP plus 65% climate change event is 1.0 and is therefore stated to be a ‘danger to some’.

Groundwater

[87] CCF-003 SFRA Level 2 Appendix A Site Reports Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon

Groundwater levels on site are shown to be 'low risk' to the south and north, with levels either at or very near (within 0.025m of the grounds surface) crossing the site from west to east, clipping the northwestern corner. Furthermore, across the southwestern and the northeastern corner of the site levels are shown to be between 0.025m and 0.5m below the grounds surface during a 1% AEP groundwater flood event.

In these instances, where groundwater levels are close to the ground surface, there is a significant risk of groundwater emergence during a flood event. Subsurface development or development requiring deep foundations run the risk of interfering with groundwater levels by displacing water. There is a requirement for site-specific flood risk investigations to determine the groundwater risk at the site through ground investigations and to demonstrate that proposed development will not impact the risk posed within or surrounding the site. Site-specific FRAs should assess the suitability of Sustainable Drainage Systems (SuDS) within the areas at potential risk of groundwater emergence.

Access and Egress

Access and egress is shown to be largely unaffected during all assessed events, with depths of up to 0.3m along Church Road heading south from the site during the 1% AEP plus climate change surface water modelling. It should be noted that the flow path crossing the site may cause inaccessibility to the southern portion of the site, however flood depths generally remain shallow.

The maximum hazard rating identified on site within the flooding extent is shown to be a 'Danger to all', however the mean hazard is shown to be a 'Danger to some'. The majority of the site is not shown to be at risk of flooding.

Key points and constraints from SFRA Level 2

The site is generally identified to be at low risk, and development is likely to progress if:

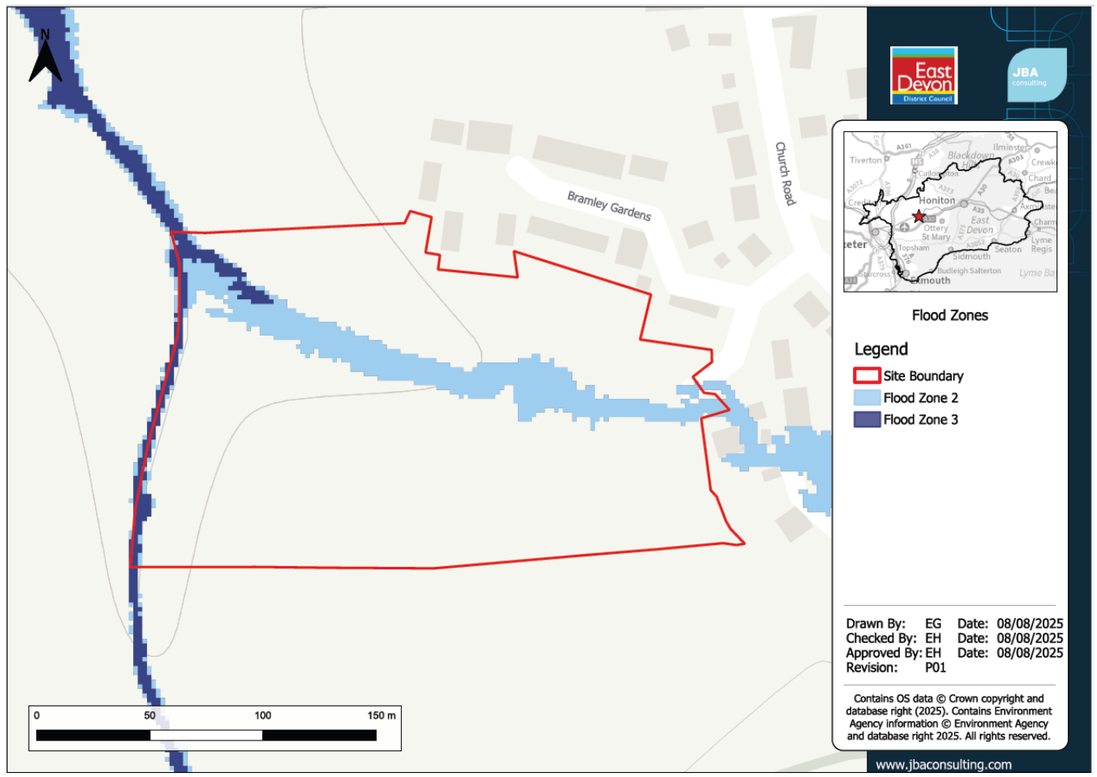
- A site-specific FRA is undertaken to assess the risk of fluvial, surface water and groundwater flooding in relation to the proposed development, and the access and egress arrangements.
- Development is placed outside of the areas at risk from surface water and fluvial flooding and within Flood Zone 1. Should development be proposed within areas at risk (within Flood Zones 2 and 3 or within at area at risk of surface water flooding) detailed flood modelling must be undertaken within a site-specific FRA.
- The area of Flood Zone 3 shown should be allocated as an undeveloped open space corridor and not as gardens, car parking or other features associated with individual plots.
- It is recommended that detailed flood modelling is undertaken to assess the risk of flooding to the proposed development even if development is located within Flood Zone 1.
- Infiltration rates are assessed on site as part of a drainage strategy.
- There is early engagement with the LLFA and the Environment Agency on the proposed SuDS measures and infiltration rate to discuss requirements on the site meeting relevant conditions due to the sites location within a nitrate vulnerable zone.
- Cumulative Impact Assessment policy documents must be understood, and the cumulative impact of development should be considered.

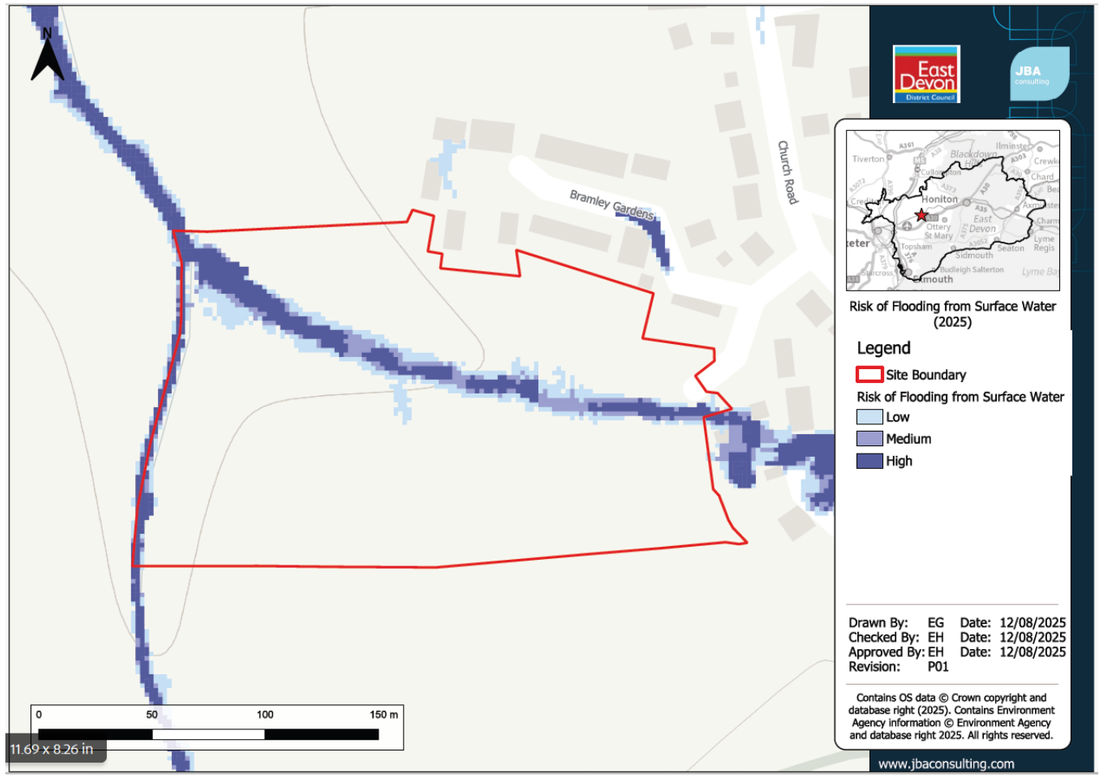
Local Plan Policy

The site is allocated for 50 homes and a community orchard. The residential development element of the scheme should be located south of the existing Bramley Gardens development. Provision of an orchard, that could include open space provision associated with new housing, will be encouraged on land to the north of the new houses. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. Where development cannot be located outside of the area at risk of flooding (over the lifetime of development) an FRA will be required to assess the risk of fluvial, surface water and groundwater flooding and therefore to inform development proposals so that no gardens or other domestic features are sited within the area of flood risk. Access would need to be off Bramley Gardens. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Prior to development, an archaeological investigation should be undertaken to understand the nature and extent of the structure noted in the Devon Historic Environment Record

Selected Maps[88]

[88] For full suite of maps see SFRA L2 Appendix A at Evidence and Examination Library - Climate Change and Flooding (CCF) - East Devon





To pass the Sequential Test, it must be shown that there are no alternative sites for the proposed development that are well related to Whimple with a lower probability of flooding, taking into account wider sustainable development objectives.

Whimple is a service village where limited development is promoted in the local plan (Strategic Policy SP01 – Spatial Strategy). 9 reasonable alternative sites were considered for potential allocation in the Regulation 19 local plan and 2 sites are included as allocations. Many of the reasonable alternatives have elements of flood risk. The Sustainability Appraisal notes that “Whim_04, 07, 11, and 13 are wholly in a critical drainage area and partly in flood zones 2 and 3. Whim_03 is partly in a critical drainage area and partly in flood zones 2 and 3. Small parts of Whim_08 are in flood zones 2 and 3 and a small part of Whim_09 together with the land adjacent to Whim_10 are in flood zone 2.” Whim_11 was allocated because it was consistent with spatial strategy with relatively few constraints. Whim_08a was allocated as it was consistent with the spatial strategy with no major adverse effects.

The total number of dwellings proposed at Whimple is 83 which would result in a 14% increase in the number of homes in the village. This scale of growth is a higher percentage increase than some similar sized settlements but is compatible with the plan strategy and makes use of the village’s sustainable location with a station on the Exeter to London Waterloo railway.

Most of the site is at a low risk of flooding, and it will be possible to adopt a sequential approach to the layout so that the most vulnerable uses could avoid the highest risk areas. The SFRA L2 notes that implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could also provide wider sustainability benefits to the site and surrounding area.

Based on the above reasoning, it is considered that this site passes the Sequential Test.

Exception test

The NPPF classifies the usage as “More Vulnerable”, this type is taken into consideration for the Exception Test.

The site is partially located within Flood Zone 2 and 3, and the 0.1% AEP surface water extent. During a 1% AEP groundwater flood event, groundwater levels on site are partially located either at or very near (within 0.025m of) the ground surface across the centre of the site. Flow paths would be expected to follow the topography of the site and be expected to be similar to surface water flow paths.

Providing development is proposed to the north or south of the site (outside of the areas at risk of fluvial or surface water flooding), the Exception Test is not required for this site, however it is recommended that detailed flood modelling is undertaken to assess the risk of flooding to the proposed development. Should development be proposed within Flood Zone 3, the Exception Test will be required and detailed flood modelling must be undertaken during a site-specific FRA.

32 Appendix Y – Approach to flood datasets used in additional SFRA Level 2

Section	Data source
Tidal risk – present and climate change	The additional sites being assessed are not at risk of tidal flooding.
Fluvial - present and climate change	Modelling from Level 1 SFRA – none of the additional sites are within the extents of existing models. New FmFP will be assessed. The NaFRA2 data does not include depth, hazard and velocity data. Clge_25a – site is not at risk of fluvial flooding. Chlo_09 – there is an existing Devon County Council model of the site, Exeter Skypark Model, developed by JBA Consulting in 2023, and this will be used to inform the fluvial flood risk. GH/ED/72a – site is not at risk of fluvial flooding. Whim_08 - RoFSW should be sufficient to assess risk to this site. The catchment area is <5km^2 and the previous RoFSW extent is similar to the updated Flood Zone extent. The previous RoFSW dataset will be used to assess depth, hazard and velocity.
Surface water risk – present and climate change	RoFSW - This will use the superseded dataset as the newly released data is not suitable for planning. The NaFRA2 data does not include depth, hazard and velocity data for surface water and the climate change

Section	Data source
	data is not suitable for planning. Return periods to be considered are 3.3%, 1% and 0.1% AEP. A comparison between the surface water extents from the two datasets will be undertaken and described in the individual site summary tables. This will compare the superseded RoFSW data with the new data sets. We have compared for the four additional sites and the extents are similar between the new and old datasets so this should provide a reasonable representation.
Groundwater	JBA Groundwater flood risk mapping – Present day 1% AEP.
Sewer	South West Water data DWMP
Breach	Not required as no sites are defended
Reservoir	Environment Agency wet and dry day reservoir risk
Flood history	Environment Agency historic flood outline EDDC/DDC flood history datasets
Topography	LiDAR
Geology/soil types	BGS Geology Viewer and Soilscapes
Defences	AIMS dataset
Flood warnings	Environment Agency FAAs and FWAs