**National Flood modelling update**

1.1 During the process of the examination, the EA published an updated National Flood Risk Assessment (NaFRA2). One of the outputs of this was an update to the flood zone data (Flood zones 2 and 3) on the 'Flood Map for Planning'. As this update incorporates surface water flooding to a greater extent than the previous national assessment, it has resulted in some areas of land that were previously only in the national Risk of Surface Water Flooding dataset as now being within flood zones 2 or 3.

1.2 The potential implications for the Additional Site Allocations from the updated modelling were discussed with the EA. The EA has advised that they do not consider that it is necessary, or reasonable (given that this would cause further delay to the examination timetable) to incorporate the NaFRA2 updates into the assessments. The EA advised that they do not consider that the new data sets change the level of risk to an extent that overall conclusions in relation to the acceptability of the proposed allocations would change, when taking into account the conservative approach already taken in both the SFRA and the proposed Local Plan policy on Flood Risk (GS9). This is set out in both the EAs comments on the Additional Site Allocations (REF1.2018) and an updated Statement of Common Ground (EXAM 150).

1.3 At the request of the Inspectors, the Council is however producing some comparison tables to assist the examination. This will address both the additional and previously proposed/examined Site Allocations. These tables allow comparison of the areas at risk of flooding (from both fluvial and surface water sources) using both the updated NaFRA2 data and the previously published data (which informed the work on the SFRAs). For the previously published data, this includes an appropriate allowance for climate change, for both fluvial and surface water flooding. For the NaFRA2 data, an appropriate allowance for climate change is included for fluvial risk (where available in the national modelling) but not for surface water. This is because the EA have confirmed that NaFRA2 modelling for climate change uplifts for surface water is not sufficient for use in planning[1].

1.4 This note is not intended as an update on the findings of the Level 1 and Level 2 SFRA and does not provide an updated analysis on the detailed nature of the changes of flood risk to an individual site (or any subsequent changes in mitigation requirements). It enables an overview of the changes to the Site Allocations and if those changes could have an effect on the development assumptions and estimated capacity of a site.

1.5 The attached table provides the evidence for sites forming discussion in week 2 of the Stage 4 hearings (Sites NWS30, NWS31, SES29, SES30, SS19, SWS18 and SWS19). Based on this analysis, when combined with the conservative approach to development in areas of flood risk already taken by both the SFRA and the proposed Local Plan policy

[1] Risk of Flooding from Surface Water - Product Description (September 2025)

on Flood Risk (GS9), the LPA is satisfied that the changes will not have an impact on the currently estimated capacities for these sites.

* Site boundary revised following SFRA assessment

# Fluvial climate change data unavailable in NaFRA2

| Site Reference | Site use | Site allocation assumed developable area (%) | SFRA assessed flood information (% of site) | | | | | | | Updated (NaFRA2) flood information (% of site) | | | | | | | Impact on potential capacity |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Flood zone 1 + no surface water risk | Fluvial | | | Surface water | | | Flood zone 1 + no surface water risk | Fluvial | | | Surface water | | | |
| | | | | Flood zone 2 (Medium) | Flood zone 3a (High) | Flood zone3b (High | Low | Medium | High | | Flood zone 2 (Medium) | Flood zone 3a (High) | Flood zone3b (High | Low | Medium | High | |
| NWS30*# | Housing | 90% | 85% | 1% | 0% | 1% | 5% | 3% | 5% | 93% | 2% | 0% | 1% | 2% | 1% | 1% | None - minimal change |
| NWS31# | Housing | 90% | 97% | 0% | 0% | 2% | 1% | 0% | 0% | 97.5% | 0% | 0% | 2% | 0.5% | 0% | 0% | None - minimal change |
| SES29* | Housing/Employment | 70% (of housing area, which equates to 43% of total site) | 88% | 0% | 0% | 0% | 7% | 2% | 3% | 93% | 0% | 0% | 0% | 4% | 1% | 2% | None - minimal change |
| SES30 | Housing/Education/Burial facility | 90% (of housing area, which equates to 68% of total site) | 96% | 0% | 0% | 0% | 2% | 1% | 1% | 97% | 1% | 1% | 0% | 1% | 0% | 0% | None - minimal change |
| SS19 | Housing | 70% | 92% | 0% | 0% | 0% | 5% | 1% | 2% | 96% | 1% | 1% | 0% | 2% | 0% | 0% | None - minimal change |
| SWS18 | Housing | 80% | 85% | 0% | 0% | 0% | 10% | 2% | 3% | 82% | 2% | 12% | 0% | 3% | 1% | 0% | None - minimal change |
| SWS19* | Housing | 90% | 92% | 0% | 0% | 0% | 6% | 1% | 1% | 88% | 0% | 0% | 0% | 6% | 2% | 4% | Increase in surface water risk. Restricting development to outside areas of high/ medium and low risk would reduce the developable area to 2.29 Hectares. Estimated 80 homes at 35 dwellings per hectare (loss of 2 units) |