

## **NPPF - COMMENT BY EMERGENCY SERVICES AND EMERGENCY PLANNERS**

### References:

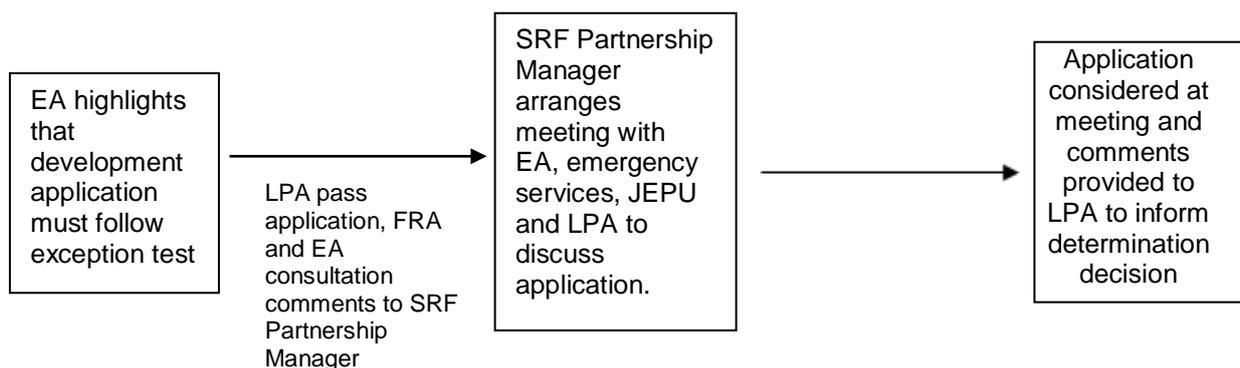
- A. National Planning Policy Framework - Planning Guidance dated July 2018. – revised version - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)
- B. MHCLG advice on [flood risk and coastal change](#) published March 2014.
- C. The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005.

1. Reference A, paragraphs 155-165 provide guidance for determining planning applications in areas at risk of flooding. The guidance requires that the development is appropriately flood resilient and resistant, including safe access and egress routes where required, and that any residual risk can be safely managed, including by contingency planning. Further advice for managing risks associated with flooding and coastal change in the planning process is issued at Reference B. This advice points local planning authorities (LPA) to consult with local authority emergency planners on the suitability of flood evacuation plans and on planning applications which have implications for emergency planning. This consultation should extend to Local Resilience Forums where issues affecting the emergency services are identified

2. Planning for flood emergencies within Suffolk is a process that is overseen by the Suffolk Local Resilience Forum (SRF) in accordance with Reference C. Specifically, the risk of flooding is assessed, and appropriate contingency planning is undertaken. The outcome of these activities is published within the Suffolk Community Risk Register and in the SRF Flood Plan; both documents available at [www.suffolkresilience.com](http://www.suffolkresilience.com). These documents demonstrate that Suffolk has assessed the risk of flooding within the county and has developed appropriate flood emergency response arrangements to deal with flood emergencies.

3. Legal advice taken by Suffolk Constabulary, Suffolk Fire and Rescue Services and Suffolk local authority emergency planning indicates that to avoid potential future liability it is not appropriate to provide a definitive statement with regards to the safety or adequacy of flood evacuation plans for developments in flood risk areas. However, recognising its collective responsibility for emergency planning, the SRF has signposted advice to developers on the content of a Flood Emergency Plan (available on the SRF website) along with other information from national and local agencies to help planning in flood risk areas.

4. A process that brings together the Environment Agency (EA), emergency services, local authority emergency planners and relevant LPA has been developed to allow a collective discussion of planning applications requiring application of the Exception test. This process allows any Suffolk (LPA) to seek advice on planning applications via a single point of contact (the SRF Partnership Manager) and for emergency responders/planners to collectively consider and provide comment on applications considering the associated Flood Risk Assessment. This process is shown as follows:



5. The outcome of this collective process is an auditable consultation with emergency services and emergency planners that allows any agency to highlight issues or concerns within the competence of the organisation over the proposed development. The process will not state the development is safe or that the Flood Evacuation plan is adequate.

6. The SRF comment will not be provided on any application that has not been shown to pass the Sequential test.

### **Point of Contact - SRF Partnership Manager 01473 265316.**

This collective approach does not replace existing mechanisms for statutory consultation with the emergency services to comment on any applications under the Town and Country Planning Act.