



The applicant should demonstrate that a safe access and egress route with a 'very low' hazard rating in accordance with the 'Framework and Guidance for Assessing and Managing Flood Risk for New Development' (FD2320/TR2) and the National Planning Policy Framework (NPPF) can be provided from the development to an area wholly outside of the 1% annual exceedence probability (AEP) plus an appropriate allowance for climate change flood extent. Any other classification of route, for example 'danger for some' or 'danger for most', will place future occupants of the development, including vulnerable people, at risk from potential flood water depths and flows. Vulnerable occupants include children, the infirm and the elderly. Where this cannot be achieved there will be an increased burden placed on your authority, the emergency services and other associated parties during times of flood.

It should be noted that during a prolonged flood event, safe refuge in the development may not be suitable due to lack of supplies (i.e. fresh drinking water and food), power supply or sanitary provision and these issues should be considered. Generally in previous flood events some foul sewage networks have not been functioning correctly due to capacity issues and/or their outlets/pumping stations being offline.

All local authorities are 'category one responders' under the Civil Contingencies Act. As you know this means you must have plans in place to respond to emergencies, and control or reduce the impact of an emergency. The approval of development within flood risk areas increases this future burden on your authority.

Therefore, it is essential that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% AEP plus an allowance for climate change flood event. If a safe route cannot be provided your authority should consider refusing the application in accordance with paragraph 103 of the NPPF and your local flood risk planning policy. Please note, safe access and egress applies to all forms of development and not solely those which are required to pass the exception test.

Where a route with a 'very low' hazard rating is not possible the local authority may deem an evacuation plan a suitable approach to mitigate the risk posed. Paragraph ID 7-057-20140306 of the National Planning Practice Guidance (NPPG) states that those proposing developments should take advice from

the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

However, this is for you the Local Planning Authority (LPA) to assess and determine. If this option is proposed you should be satisfied that the hazards associated with the proposed development can be managed for its' lifetime. Additionally you must accept any increased burden, including any financial or other resourcing matters, on the emergency services.

The Environment Agency does not comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.