



Pink Planning

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Penny Hill Road, Holbeach

Flood Risk Sequential Test

Proposed residential development

Studio 11 Architecture & Ashwood
Homes

April 2016

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1. Introduction

- 1.1 Pink Planning has been instructed to undertake a Flood Risk Sequential Test in support of a full planning application for 44 dwellings on Penny Hill Road, Holbeach.
- 1.2 A separate Flood Risk Assessment has been prepared because the development is located in Flood Zone 3 and covers an area greater than 1 hectare.

2. Site location and description

- 2.1 The site comprises a vacant piece of land, approximately 1.3 hectares in size to the north of Holbeach. It lies within the South Holland IDB Drainage District.
- 2.2 The site was previously occupied by commercial glasshouses associated with a nursery business.
- 2.3 The site is bordered by Penny Hill Road to the west, open fields to the east, Tolls Lane residential estate to the north and a football club facility to the south.

3. The proposed development

- 3.1 The application proposes 44 residential units comprising a mix of terraced and semi-detached dwellings with associated gardens and driveways. Access is proposed via Penny Hill Road.
- 3.2 More detail about the proposed development including a site layout plan can be viewed in the accompanying Supporting Planning Statement and Design and Access Statement by Studio 11 Architecture.

4. Flood risk

- 4.1 Flood Zone classification
 - 4.1.1 The site lies within Flood Zone 3 of the Environment Agency's Flood Maps, having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in

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200 or greater annual probability of flooding from the sea (>0.5%) in any year (Figure 1). However, these maps do not take flood defences into account.

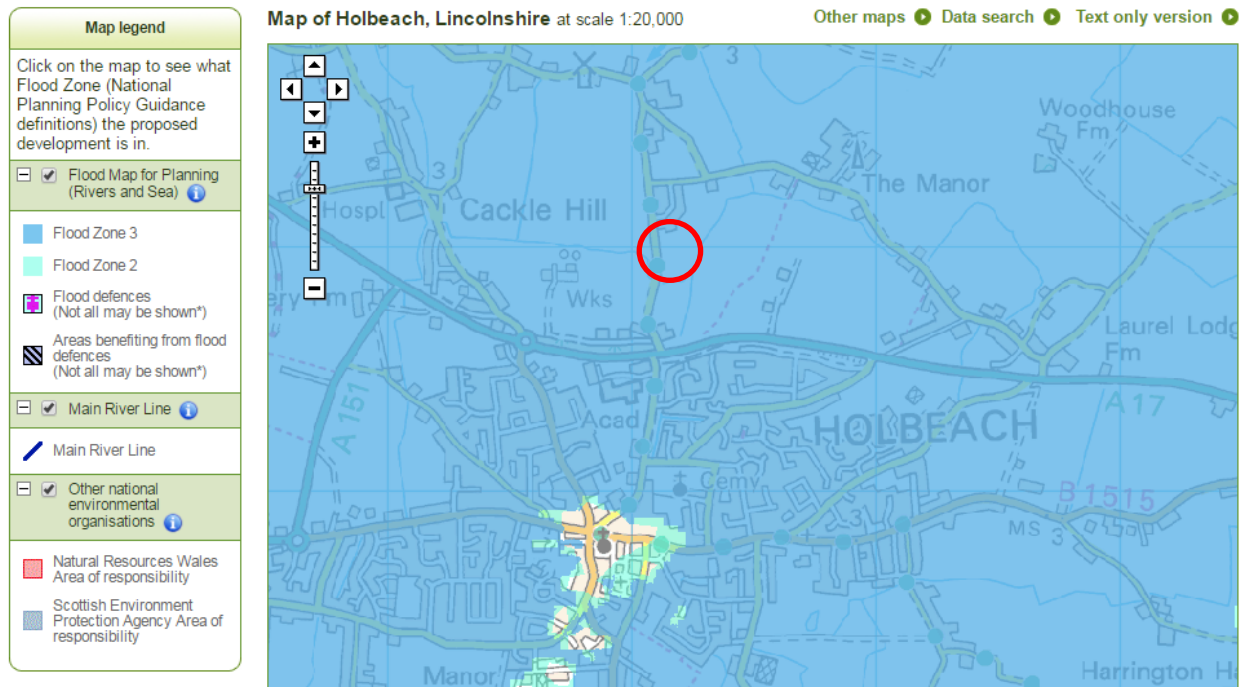


Figure 1. Information extracted from www.environment-agency.co.uk

4.1.2 The Council's Strategic Flood Risk Assessment (2010) provides more definitive Flood Risk Maps than those published by the Environment Agency and analyses flood return periods of flood defences to account for the effects of climate change.

4.1.3 The SFRA shows the site to be within a defended floodplain and outside of any Hazard Zones up to 2115. The likelihood of flooding is therefore considered to be small.

4.2 Vulnerability

4.2.1 The NPPF Technical Guidance Document sets out flood risk vulnerability classifications for various land uses, acknowledging that not all land uses have the same vulnerability to flooding.

4.2.2 Residential development is classified as 'More Vulnerable' and requires an Exception Test where it is located within Flood Zone 3.

5. Policy context

5.1 National policy context

5.1.1 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and sets out the Government's planning policies for England and how these are expected to be applied.

5.1.2 Paragraph 100 of the NPPF advises that "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere". The NPPF therefore requires a sequential approach where areas at little or no risk of flooding are developed in preference to areas at higher risk. The aim is to avoid flood risk to people and property and manage any residual risk. It is advised that this should be achieved by:

- Applying the Sequential Test and if necessary, the Exception Test
- Safeguarding land from development that is required for current and future flood management
- Using opportunities offered by new development to reduce the causes and impacts of flooding
- Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

5.1.3 Paragraph 101 of the NPPF confirms that: "The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding".

5.1.4 Having completed the Sequential Test, the Exception Test aims to provide a method of managing flood risk whilst still allowing necessary development to occur in the interests of sustainable development.

5.1.5 There are two elements to the Exception Test that need to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- A site-specific Flood Risk Assessment must demonstrate 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.

5.2 Local policy

5.2.1 Information on flood risk within the district is provided in the 'South Holland District Council Update of Strategic Flood Risk Assessment: Final Report (2010)'.

5.2.2 A Catchment Flood Management Plan was produced by the Environment Agency for the Welland catchment in 2009, which covers Holbeach. The preferred policy for the Fenland area is to "take further activities to maintain the current level of flood risk management into the future."

5.2.3 The adopted South Holland Local Plan (2006) sets out the vision and strategy for land use and development across the district until 2021 and includes specific policies and proposals to guide and manage development. Policy GG9 relating to development and flood risk was withdrawn in 2009. The application site is not allocated for development within the Local Plan.

5.3 The Sequential Test

5.3.1 As the proposed development is located in Flood Zone 3, there is a requirement to apply the NPPF Sequential Test to determine if there are any 'reasonably available' and suitable alternative sites at lower flood risk. However, it is considered that the Sequential Test as defined in the NPPF has been passed for the following reasons:

- A large extent of Holbeach including the whole of the immediate surrounding area is located within Flood Zone 3 (see Figure 1) and

therefore there are no suitable alternative sites at lower flood risk within the town.

- It is a material consideration that the Council has permitted residential development on the site (ref. H09-0789-11).
- Although currently undetermined, an application for a residential development of a similar scale within Holbeach at Northon's Lane (ref. H09-0844-14) has been found to be acceptable in terms of meeting the sequential and exception tests¹. This site is located within the same Flood Risk area.
- The Local Plan allocates an area for housing in Holbeach which lies within the same flood risk area.

5.4 The Exception Test

5.4.1 The site is shown on the Environment Agency Flood Maps to be within Flood Zone 3 (Figure 1). The Exception Test has been carried out in accordance with the NPPF (see section 5.1.4).

5.4.2 The first part of the Exception Test is addressed by the wider benefits provided by the new development which include:

- The provision of 44 new homes, contributing to the current shortfall in housing supply in the District.
- Enabling the development of the adjacent community sports facility.
- Incorporating onsite surface water attenuation and thereby reducing the level of surface water run-off from the site.
- Associated social, economic and environmental benefits from the redevelopment of a derelict brownfield site thus reducing the need to develop greenfield sites.

5.4.3 The second part of the Exception Test is addressed within the accompanying Flood Risk Assessment which clearly demonstrates that the site is safe for its lifetime.

5.4.4 In summary, the Exception Test is passed and the development is appropriate in flood risk terms.

¹ Officer's report dated 5th August 2015

6. Conclusions

- 6.1 Pink Planning were instructed to undertake a Flood Risk Sequential Test in relation to a site at Penny Hill Road, Holbeach.
- 6.2 Given the particular circumstances of the case as outlined in section 5.3.1, it has not been considered relevant or necessary to conduct a detailed review of reasonably available alternative sites within Flood Zones 1 and 2. It is noted that the Council accepted this approach for a similar scale residential development in Holbeach (ref. H09-0844-14). The site is considered to have satisfied the sequential test and is available for development.
- 6.5 The two elements of the Exception Test were then considered. It was concluded that the site provides significant sustainability benefits to the community, development would be located on previously developed land and, as demonstrated by the Flood Risk Assessment, the development will be safe, without increasing flood risk elsewhere.
- 6.6 In conclusion, the site meets all relevant parts of both the Sequential and Exception Tests required by the NPPF and the proposed development is therefore considered appropriate in flood risk terms.

