



# Flood Risk Sequential and Exception Tests

Evidence Report  
September 2013

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## 1. Introduction

Fenland District Council is producing the Fenland Local Plan - Core Strategy Development Plan Document which provides the framework for how development will be considered across the district to 2031. The Core Strategy sets out that approximately 11,000 new homes and 7,200 new jobs will be provided during the plan period.

In establishing where new growth should occur the Council has had regard to a range of sustainability criteria including flood risk, and the findings are provided in its Sustainability Appraisal. This report though provides a more in-depth analysis of how the Flood Risk Sequential Test (and where necessary the Exception Test) have been undertaken to inform the policies in the Core Strategy.

## 2. National Planning Policy on Flood Risk

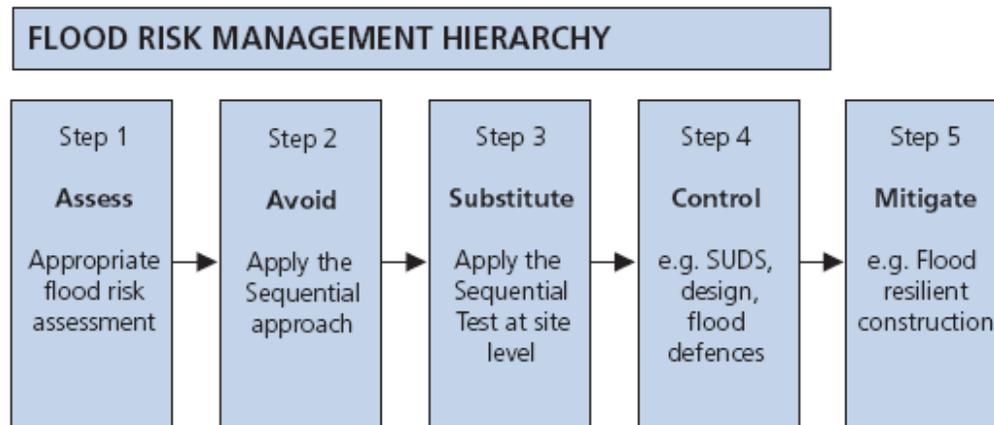
The National Planning Policy Framework – March 2012 (NPPF) advises (in paragraph 99) that “Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape.”

Furthermore in paragraph 100 it advises: “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..... Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying 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; and
- 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.”

The Sequential Approach is a key component of the hierarchical approach to avoiding and managing flood risk as shown in Figure 1 below.

Figure 1



In undertaking the Sequential Test and where necessary the Exception Test (as detailed in Section 9 of this document) for its strategic allocations and broad locations, the Council has had regard to the advice in the NPPF, the Technical Guidance accompanying the NPPF, the retained Practice Guide for PPS25, as well as two current SFRA's for the district. The Fenland Neighbourhood Planning Vision study (FNPV) has also been used to inform the report.

### 3. Sequential Test

The Sequential Test is a decision making tool designed to ensure that areas at little or no risk of flooding are developed in preference to areas of higher risk. NPPF advises (in paragraph 101) 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."

Moreover, a Strategic Flood Risk Assessment (SFRA) should provide the basis for applying the Sequential Test, and a sequential approach should be used in areas known to be at risk from any form of flooding.

The Practice Guide to Planning Policy Statement 25 (PPS25) - December 2009, was not revoked with the main document at the time of the introduction of the NPPF in March 2012, and for the time being still provides relevant guidance. The Practice Guide advises that the Sequential Test should cover the whole local planning authority (LPA) area, as there may be lower risk areas which are unsustainable for development in other ways (paragraph 4.17).

The Practice Guide also advises (paragraph 4.20) that, "An LPA allocating land for development must demonstrate that it has considered the range of possible options in conjunction with the flood zone information from the SFRA and vulnerability of development and applied the Sequential Test, and where necessary the Exception Test, in the site allocation process."

## **4. Exception Test**

Paragraph 102 of the NPPF allows the application of the Exception Test by the LPA where following application of the Sequential Test it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower risk of flooding. The Exception Test therefore provides a method of managing flood risk while still allowing development to occur.

There are two elements to the Exception Test as set out below. Both elements need to be passed.

- a) 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
- b) A site-specific flood risk assessment (FRA) 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.

Table 3 “Flood risk vulnerability and flood zone compatibility” in the Technical Guidance to the NPPF, sets out when development is appropriate and when the Exception Test needs to be undertaken. Information in Table 1 “Flood zones” and Table 2 “Flood risk vulnerability classification” also needs to be considered at the same time.

## **5. Background Evidence**

The next two sections consider the available evidence for establishing flood risk, and sets out the key assumptions which have been used to inform the initial criteria for choosing which areas should be allocated for development.

## **6. Relevant Strategic Flood Risk Assessments (SFRAs)**

A District-wide Level 1 SFRA was prepared for the Council in July 2011 by Scott Wilson consultants. This built on a previous SFRA produced in 2005 under now superseded guidance in PPG25. The District-wide SFRA includes the Environment Agency’s Flood Map which shows the risk of flooding throughout the district without any flood defence infrastructure being present. Information from the SFRA has been used to inform the Council’s Local Plan work including the preparation of the Sustainability Appraisal and Core Strategy.

A Level 2 SFRA has also been prepared for the Council for the Wisbech area (June 2012) by WSP consultants. This is more detailed than the Level 1 SFRA, with its primary aim being to inform the Exception Test. This SFRA takes into account current flood defence infrastructure and the potential impact on the study area in the event that these were to fail. The results are shown on a series of maps in the Appendices which indicate a range of possible flood events, whilst also taking the effects of climate change into account. The Wisbech Level 2 SFRA has also been used to inform the preparation of the Sustainability Appraisal and Core Strategy.

## **7. Planning Background and Key Assumptions**

The Core Strategy sets out that the Council is planning to provide approximately 11,000 new homes and 7,200 new jobs by 2031.

The distribution of this growth is set out in Core Strategy Policy CS3 – Spatial Strategy, the Settlement Hierarchy and the Countryside. The majority of the growth is to be directed to the four Market Towns of Chatteris, March, Whittlesey and Wisbech with some directed to the Growth Villages of Doddington, Wimblington, Manea and Wisbech St Mary. A lesser number still are to be provided in the Limited Growth Villages, Small Villages and Other Villages. This report only considers the Sequential Test as it applies to its strategic allocations and broad locations in the four Market Towns.

Part 2 of the Sustainability Appraisal sets out the details of the assessment for each of the towns and the reasoning behind the choice of sites based on a range of sustainability criteria, including flood risk. This report though considers flood risk issues in terms of the Sequential Approach and Test (and where necessary the Exception Test) and how these have come to inform the allocation process.

The following factors were used to guide the allocation process in the first instance:

- In identifying potential areas of land for new development in the Market Towns, the Council is mindful that there are limited opportunities within the existing footprint of these settlements to accommodate the proposed housing numbers.
- In addition, whilst acknowledging the Government's preference to utilise Brownfield Land – Previously Developed Land (PDL) over Greenfield sites for new development, there are currently few opportunities to utilize PDL in the district (both within and outside the built footprint of settlements), to achieve the proposed numbers. As a result the Council has been obliged to consider significant areas of Greenfield land for development.
- In order to develop as sustainably as possible the Council is also mindful that in identifying new areas for development these should be located adjacent to the settlement wherever possible in the first instance.

## **8. Applying the Sequential Test**

The following sections explain how the known risk of flooding and the Sequential Approach were considered in the selection of the strategic allocations and broad locations for development in each of the four Market Towns, and how the Sequential Test and Exception Test (where necessary) were utilized in the process. The report therefore complements the evidence provided in Part 2 of the Sustainability Appraisal.

Each of the four Market Towns is considered as follows:

## 9. Chatteris

### Housing

The Core Strategy sets out that approximately 1,600 new dwellings will be built in Chatteris during the plan period.

The District Wide SFRA and Environment Agency's Flood Map indicate that most of the built-up area of the town is situated within Flood Zone 1 (Low risk) with the exception of areas to the north and west including the Dock Road Industrial Estate north of the A142 and the Honeysome Road Industrial Area west of the A141.

Flood Zones 2 (Medium risk) and Flood Zones 3 (High risk) are predominantly located to the north and west of the town.

There are large areas of undeveloped land to the east, south, and north-west of the town which fall within Flood Zone 1. There is also an area to the south-west which may be able to accommodate new development. These areas were therefore considered for new housing growth in the first instance in line with the sequential approach.

Land to the east and south satisfy a range of sustainability criteria including relatively easy access to the town centre and other key services such as primary and secondary schools. Both these areas are therefore included as strategic allocations (East Chatteris and South Chatteris).

However, the area to the north-west is some distance from the town centre, "severed" from the main part of the town by the A141, and would adversely affect the town's morphology. Land to the south-west is considered insufficient in area to be either a strategic allocation or broad location in the Core Strategy (i.e. not able to provide a minimum 250 dwellings), is some distance from the town centre, would encroach into open countryside, and would adversely affect the town's morphology. Both these areas are therefore considered to be less sustainable locations for new development than those to the east and south.

An area adjacent to the north-east of the built up area of the town and south of the A142 was also identified as a potential location for development due to it satisfying a range of sustainability criteria including its proximity to the town centre and other services, and its limited impact on the morphology of the town. However, about two thirds of this area falls within Flood Zone 3, with the remaining third (adjacent to the built up area) falling in Flood Zone 1.

### Employment

The Council has estimated that it will require approximately 20ha of employment land in Chatteris during the plan period. Some employment is likely to be provided to the south of the town as part of the strategic allocation. However a substantial requirement will remain. Any enlargement of the two main employment areas at Dock Road and Honeysome Road would be within Flood Zone 3. Development in these areas would also fail to satisfy a range of other sustainability criteria including severance from the remainder of the town, encroachment into open countryside and an adverse impact on the town's morphology.

There are therefore no other reasonable locations in and around the town that the Council considers would be suitable for new employment purposes. Employment uses fall under the “Less vulnerable” category in Table 3 of the Technical Guidance to the NPPF, and the Exception Test would not be required. The Council considers that providing that any development is compatible with the criteria in the Technical Guidance to the NPPF, the area to the north-east provides an opportunity to develop in a way that satisfies a range of sustainability issues. North Chatteris is therefore identified as a broad location for growth as an opportunity for mixed development including for housing to be located in Flood Zone 1.

### Summary

Areas to the east, south, and north-east are all within Flood Zone 1 and are therefore those given preference as strategic allocations or broad locations for new housing as shown on the Chatteris Key Diagram in the Core Strategy document. Parts of the north-east area would be likely to be used for employment purposes (or similar compatible flood risk uses) as this is considered the most sustainable location for this type of use when set against a range of sustainable criteria and when compared to other options, and would not require the Exception Test to be passed. The Council considers that these areas will be sufficient to provide for the town’s expected growth during the plan period.

## **9. March**

### Housing

The Core Strategy sets out that approximately 4,200 new dwellings will be built in March during the plan period.

The District-wide SFRA and Environment Agency’s Flood Map shows that the majority of the existing built-up area of the town is located within Flood Zone 1 (Low risk) with some relatively minor areas to the east, west, south-east and north (including part of the March Trading Estate) falling within Flood Zone 2 (Medium risk) and Flood Zone 3 (High risk).

Flood Zones 2 and 3 are generally located closest to the town to the east and west and further away to the north. To the south is generally the higher clay “island” ground which extends towards the villages of Wimblington and Doddington. To the east the alignment of the disused March to Chatteris railway line and the existing Peterborough to Ely railway broadly form a demarcation line between Flood Zones 2 and 3 and Flood Zone 1. On the west side of the town the A141 provides a clearer demarcation between Flood Zones 2 and 3 and Flood Zone 1.

There are therefore substantial areas of undeveloped land around and adjacent to the town which fall within Flood Zone 1. These include areas to the north-east, east, south and west.

These areas were those considered for inclusion as strategic allocations and broad locations for new development in the first instance in line with the Sequential Test.

Areas to the north-east, south-east, south-west and west are all totally, or predominantly, within Flood Zone 1. In addition to low flood risk all of these areas satisfy a range of other sustainability criteria to varying degrees. The sites that have been taken forward in

the Core Strategy are those shown on the Key Diagram for March either as a strategic allocation or a broad location. These are South-east March, South-west March, and West March. These areas were considered to be the most preferable based on the full range of sustainability issues as set out in Part 2 of the Sustainability Appraisal.

### Employment

The Council is proposing to provide approximately 30ha of new employment land in March during the plan period. The March Trading Estate is currently the main employment area in the town and has scope to expand, though other areas (such as the West March and South-west March strategic allocations) may include some employment provision. The March Trading Estate is therefore also identified in the Core Strategy as a broad location for growth.

The March Trading Estate is well related to the existing employment area and the remainder of the town and satisfies a number of other sustainability criteria. There are a number of sites within and to the north of it which would be available for development and which are in Flood Zone 1. There is also a substantial area of land to the south of Hostmoor Avenue and north of the railway line which falls within Flood Zone 3. Any development of this land including for business/ employment uses would need to be compatible with the flood risk category as specified in the Technical Guidance to the NPPF and the Council is confident that this can be achieved.

### Summary

There are significant areas to the south-east, south-west and west of the town which fall within Flood Zone 1 and are allocated for predominantly housing in the Core Strategy. Parts of the March Trading Estate are also within Flood Zone 1 and would allow expansion of this established employment area in accordance with the Sequential Test. There is though a sizeable area adjacent to existing employment activities that falls within Flood Zone 3, and as it satisfies a range of other sustainability criteria and is seen as an appropriate area for expansion provided any uses are compatible with its flood risk status, is included within the broad location.

## **10. Whittlesey**

### Housing

The Core Strategy sets out that approximately 1,000 new dwellings will be built in Whittlesey during the plan period.

The majority of the built-up area of the town falls within Flood Zone 1 (Low risk) as shown in the District-wide SFRA and Environment Agency's Flood Map, with a few relatively small residential areas to the north, and commercial areas to the south and west, falling within Flood Zone 2 (Medium risk) and Flood Zone 3 (High risk).

Flood Zones 2 and 3 effectively "surround" the town, but there are currently undeveloped areas of land particularly to the east and north-west as well as more minor areas to the south-west and north which fall within Flood Zone 1. These areas were therefore considered for inclusion as strategic allocations and broad locations for housing growth in the first instance in line with the Sequential Test.

The areas to the south-west and north by virtue of their size (i.e. not capable of providing 250 dwellings or more) were not considered suitable for inclusion either as a strategic allocation or broad location. Whilst relatively large the area to the north-west is very close to the internationally designated Nene Washes and an Appropriate Assessment under the Habitats Regulations would be required to establish whether any development in this area was acceptable. In addition this area would be some distance from key services with a potential impact on the town's morphology.

As well as being in Flood Zone 1 land to the east of the town is less constrained by nature conservation designations, is relatively close to a number of key services and satisfies a range of sustainability criteria. It is therefore included as a strategic allocation for mainly residential purposes in the Core Strategy.

### Employment

The Core Strategy sets out that the Council needs to provide approximately 5.0ha of employment land in the town during the plan period. The Council is not proposing to allocate any land in Whittlesey specifically as a strategic allocation or broad location for employment purposes, although large parts of the likely areas identified for this type of use (including the Station Road / Benwick Road Industrial Area, and to the west of the town along the A605 and to the north of King's Dyke as far as Field's End Bridge) fall within Flood Zone 1.

### Summary

The area to the east of the town and north and south of the A605 (East Whittlesey) is within Flood Zone 1 and satisfies a range of sustainability criteria. It is shown on the Key Diagram for Whittlesey as a strategic allocation and the Council considers this area will be able to provide for the town's main housing growth during the plan period.

## **11. Wisbech**

### Housing

Wisbech is one of the two larger market towns in the district with a large range of services and good employment base and consequently identified as a key area for growth during the plan period. The Council considers that new developments and associated infrastructure will bring important benefits to the town.

Policy CS4 – Growth and Housing in the Core Strategy sets out that approximately 3,000 dwellings will be built in Wisbech during the plan period, subject to highways and flood risk issues being resolved in detail through the master planning process. In addition, there are areas outside the district boundary and situated within the Borough Council of Kings Lynn and West Norfolk where new development of about 550 new homes is likely to come forward.

The District-wide SFRA and Environment Agency's Flood Map indicate that approximately one half of the existing built-up area of Wisbech falls within Flood Zone 1 (Low risk) with the remainder falling within Flood Zone 2 (Medium risk) and Flood Zone 3 (High risk). The northern and western parts of the town, including substantial residential areas are predominantly in Flood Zones 2 and 3 with the eastern and southern areas predominately in Flood Zone 1.

Undeveloped areas of land to the north and west fall predominantly within Flood Zones 2 and 3, whilst those to the east and south are mainly within Flood Zone 1.

In seeking to allocate land for new housing the Council has identified areas to the east and south which fall within Flood Zone 1 which would be suitable for new development in accordance with the Sequential Test (East Wisbech and South Wisbech).

Although two significant areas for new housing falling within Flood Zone 1 have been identified, there are no other suitable or available sites to cater for the Council's growth ambitions. As a result the Council has been obliged to consider areas to the west of the River Nene which fall predominantly within Flood Zones 2 and 3 to provide for the additional numbers, as well as to satisfy a number of wider sustainability issues. As a result the Exception Test has been undertaken as explained as follows.

## Sustainability Issues in Wisbech other than Flood Risk

There are a number of sustainability issues in Wisbech other than flood risk which are inter-related and are set out briefly below:

### Town Morphology

The Council considers that an excessive expansion of the town only to the east and south would result in its shape becoming "unbalanced." This would not assist in the town developing in a sustainable way and be contrary to the sustainability objectives of both national planning legislation and the Core Strategy.

### Distance from Town Centre

The historic development of Wisbech has resulted in a town where the incremental addition of new residential areas over time has meant the distance from the town centre has increased such as to make the journey by more sustainable modes of travel (walking and cycling) from the outer areas less and less likely. In addition the poor public transport service means that people are left with little choice but to use private vehicles, and particularly cars, to travel to key services in the town including the town centre.

### Highway Network

The reliance on the private cars has meant there is a significant adverse impact on the local highway network. The network is already overstretched as indicated in the emerging Wisbech Area Transport Study, particularly along the main arterial routes into the town and around the Freedom Roundabout in the centre. Movement on the A47 to the south of the town is also hampered by a lack of capacity and over-use including from local traffic. The reliance on private cars and associated carbon emissions is contributing to climate change. This is contrary to sustainability principles underlying the current national planning system, as well as one of the main objectives of the Core Strategy which is to "limit or reduce vulnerability to the effects of climate change."

### Vitality and Viability of the Town Centre

Despite its exceptional historic quality Wisbech town centre is presently in decline. The Fenland Retail Study Update 2009 highlighted amongst other issues that that the town centre had slipped in the national retail rankings from 368th in 2001 to 511<sup>th</sup> position in 2008, there was a relatively limited retail offer, there were a high number of long term

vacancies, and the public realm in some parts needed improvement. Part of the decline was due to people choosing to shop in out of town centre shops, or other towns and cities altogether, thereby having a further detrimental impact on the vitality and viability of the town centre.

### Heritage Assets

The town boasts some exceptional heritage assets mainly located mainly within the Wisbech Conservation Area. The decline of the town centre and associated long term vacancies has also had an adverse impact on these heritage assets, culminating in some instances in devastating arson attacks on empty listed buildings in the very recent past. The configuration of the existing highway network also results in an adverse impact on the heritage assets particularly along North Brink on the west side of the River Nene.

### Deprivation

Wisbech is also characterized by high levels of deprivation in some areas and a number of factors including poor educational attainment and low skills levels contribute to the local economy's lack of competitiveness and ability to attract new investment. There is also a noticeable shortage of public open space within the town which contributes to health inequalities, economic deprivation and a low quality living environment.

In order to tackle these wider sustainability issues the Council is therefore proposing a broad location for predominantly housing with potentially some business uses on the west side of the River Nene. The area falls mainly within Flood Zones 2 and 3. As a result of advice from the Environment Agency the Council commissioned a Level 2 SFRA for Wisbech which was completed in June 2012 and has been used to inform the Exception Test.

## Key findings from the Wisbech Level 2 SFRA

Relevant issues identified in the Wisbech SFRA are:

- Wisbech is currently well defended from the risk of flooding.
- The low lying topography means that the area is pump-drained by a highly developed system which will be retained and upgraded into the foreseeable future.
- The town's flood defences are currently being upgraded by the Environment Agency (the work is substantially completed) to maintain the flood defence standard of being capable of dealing with a 1 in 200 year flood event.
- The River Nene and Great Ouse Catchment Flood Management Plans both identify Wisbech as falling within an area where further action will be taken to sustain flood risk now and in the future.
- The flood defence infrastructure is therefore to be maintained in the town for the foreseeable future.
- Computer modelling and mapping identifies those areas most at risk from the breaching or overtopping of defences.
- Whilst some areas closest to the river would be more at risk from a failure of the defences the further away from the west side of the river, the lower the flood risk.

- Appropriate mitigation measures could allow development to proceed in particular locations assuming that all relevant flooding issues are taken into consideration and adequately addressed.
- Proposed new developments in the town already falling within high risk flood zones will need to pass a range of criteria specified in a Toolkit Guidance Note accompanying the SFRA.

The Council has had extensive discussions with the Environment Agency about potential development to the west side of Wisbech over the last four years or so. Environment Agency officers formed part of the Steering Group which advised WSP consultants in the preparation of the Wisbech SFRA. The Environment Agency has been at the forefront in ensuring that the Wisbech SFRA considered all relevant issues and has accepted the findings of the SFRA. The Agency has also advised on appropriate wording for planning policies in the Core Strategy to address future development on the west side of the town to ensure flood risk issues are adequately considered and addressed.

### Exception Test in Wisbech

In assessing whether the allocation to the west side of Wisbech satisfies the Exception Test as set out in the NPPF the Council's consideration of both elements is set out as follows:

1. **The Council considers that there are wider sustainability benefits to the community that outweigh the risk of flooding, informed by a Strategic Flood Risk Assessment where one has been prepared, namely:**
  - It will prevent an “unbalanced” shaped town emerging.
  - Developing closer to the town centre will allow a choice for more sustainable modes of travel i.e. walking and cycling to key services.
  - The vitality and viability of the town centre and existing heritage assets will be enhanced.
  - There will be potentially less impact on the existing highway network and overall will require less highway infrastructure to enable the development than in other locations, such as a major urban extension with relief road.
  - Infrastructure associated with new developments to the west including a new river crossing could help overcome existing infrastructure deficits making travel around and through the town easier and safer by all modes of travel.
  - The Conservation Area to the west side of the river will be improved by alterations to the local highway network.
  - Multi-functional green infrastructure to be provided as an integral part of the development, partly to cater for flood risk, will be available as public open space for local residents.
  - A high quality living environment will be created.
  - It will assist the town in its wider regeneration objectives, help prevent social deprivation, and improve the competitiveness of the local economy.
  - The Council's commitment to master planning the area (as set down in Core Strategy Policy CS7 – Urban Extensions) will ensure that sustainable benefits for the community can be realised.

- 2. A site-specific flood risk assessment (FRA) 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:**
- The Council has stipulated in Core Strategy Policy CS8 – Wisbech, that any comprehensive delivery scheme (master plan) for West Wisbech will be required to be informed by a detailed area Flood Risk Assessment. The area FRA will need to provide strategic landscaping and flood risk mitigation to ensure that land uses vulnerable to flood risk are protected.
  - In adopting a master planning approach to development in its urban extensions including for West Wisbech, the Council is committed to working with all statutory agencies and other bodies responsible for avoiding flooding. This partnership working is evidenced by the joint production of a number of recent studies including the Council's Water Cycle Study (Scoping, Outline, and Detailed Phases), the District-Wide SFRA and the Wisbech SFRA2, as well as work on the Cambridgeshire Surface Water Management Plan (SWMP).
  - The Council will expect any master plan and FRA to comprehensively consider the risks of flooding to ensure development is safe, will not increase flood risk elsewhere, and where possible will reduce flood risk overall. The Council would not be prepared to support any comprehensive delivery scheme or area FRA that did not have the full backing of the Environment Agency and other authorities responsible for maintaining and operating the drainage system. Following discussions with developers and agents the Council is confident that an area FRA can be provided to the satisfaction of all relevant parties.

The Council considers that in allocating the West Wisbech broad location that both parts of the Exception Test in the NPPF can be satisfied, and as such the allocation is sound in planning terms.

#### Employment

The Council needs to provide approximately 30ha of new employment land in Wisbech during the plan period. The existing employment area in the south of Wisbech is well related to the remainder of the town and has scope to expand. Whilst other areas such as West Wisbech and the Nene Waterfront and Port Area will be able to provide some employment the Council considers the southern employment area is the most suitable area for a substantial amount of new business use.

The western part of this area identified for expansion (the South Wisbech broad location) however falls within Flood Zone 3. Any development would therefore need to be compatible with the flood risk category as specified in the Technical Guidance to the NPPF and the Council is confident that this can be achieved.

#### Summary

Areas to the east and south falling within Flood Zone 1 are identified for new housing in accordance with the Sequential Test. For wider sustainability benefits the Council considers that the Exception Test can be passed to warrant residential development on the west side of the River Nene. Whilst in Flood Zone 3, land to the south-west of the town is included as a broad location for employment purposes.

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## **12. Conclusion**

In accordance with national guidance the Council has used the Sequential Test and where necessary the Exception Test to inform the allocation of land in its Core Strategy either as a strategic allocation or broad location for growth.

For proposed housing sites within March, Chatteris, Whittlesey and to the east and south of Wisbech, these would all be within Flood Zone 1 and be in accordance with the Sequential Test. For a range of wider sustainability benefit reasons the west side of Wisbech has been identified as an appropriate location for new residential development. This is supported by evidence in the Wisbech SFRA, the fact that the Council considers the Exception Test can be passed, and the Environment Agency's response confirming that this approach has its conditional support providing that residual risk can be mitigated against through an approved area FRA and a comprehensive master plan for the area.

The Council considers that the proposed strategic allocations and broad locations provide the most appropriate way of utilizing land in accordance with the identified flood risk status while at the same time taking into account wider sustainability issues which would be of benefit to the community.