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03/PO1-L01
Your ref:
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Dear Mr Dittman

ATHERSTONE: LOCAL PLAN ALLOCATIONS

SEQUENTIAL TEST 2019

I write in response to your draft Sequential Test report for the Atherstone site allocations affected by flooding which are currently under consideration by the Planning Inspectorate as part of your Local Plan examination.

The NPPF has recently been updated with regards to taking climate change into account when undertaking the sequential test: (paras 155, 157 and 158).

The revised NPPF is now much clearer that the Sequential Test, and the wider sequential approach, should take into account future flood risk from all sources (taking into account the predicted impacts of climate change). SFRA's will normally form the basis for applying the test, and we have previously noted that your Level 1 SFRA (2013) and Level 1 SFRA Update (2013) predate 2016 changes to climate change allowances. We also have concerns previously documented regarding the validity of conclusions drawn from the site specific technical note undertaken as part of the examination in support of these allocations, specifically relating to the accuracy of the flood extents produced as an output and the use of terms such as 'areas A and B' as used on the supporting site maps for zoning purposes.

References to 'zones' have generally been changed to 'areas' to recognise the reduced role of the Flood Zones for the Sequential Test – given they only show present-day risk. It is of note that your approach to the Sequential Test is based on flood zones only. References to 'probability' have also been changed to 'risk' to allow for more local choice and more sophisticated approaches to establishing risk.

More information on the appropriate climate changes to be used can be found at the following link - <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

In the first instance, the Sequential Test should be done on a precautionary basis, ignoring the presence of flood risk management infrastructure. However, where these flood risk areas can't be avoided (especially where they are widespread), it may then be appropriate to apply the test on the basis of sub-delineation using factors such as depth or hazard. Where defences are present, sub-delineation should be based on residual risk i.e. the failure or overtopping of defences (local circumstances will determine which of these scenarios or combination of these scenarios will form the most suitable basis).

Further guidance on this should be provided in the PPG, however I note the section on the Sequential Test has not been updated since 2014 and as such does not reflect these recent changes to the NPPF. The NPPG guidance is available [here](#).

Furthermore, it should be considered the extent to which your allocations are required to be in compliance with recent updates to the NPPF in 2018 and 2019, as the bulk of the work was undertaken under the NPPF 2012.

Yours sincerely

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