



**Sequential Test Report
Great Staughton Neighbourhood Plan**

Parish Council meeting 12th September 2024

29th August 2024

Cambridgeshire ACRE

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INTRODUCTION

1. This report documents the sequential test appropriate to flood risk that has been undertaken to inform the site allocations in the Great Staughton Neighbourhood Plan to 2036.

NATIONAL POLICY REQUIREMENTS

2. National Planning Practice Guidance (NPPG) sets out requirements for the sequential and exception tests for flood risk. Specifically, the National Planning Practice Guidance on Flood Risk and Coastal Change states that the overall approach in paragraph 161 (now paragraph 167) of the National Planning Policy Framework applies to neighbourhood planning. PPG states:

‘Where they make provision for development, the qualifying bodies involved in neighbourhood planning will need to:

- ensure that neighbourhood plans (and any neighbourhood development/community right to build orders) are informed by suitable assessment of flood risk from all sources, both now and in the future;
- steer development to areas of lower flood risk as far as possible;
- ensure that any development in an area at risk of flooding would be safe, for its lifetime taking account of climate change impacts;
- be able to demonstrate how flood risk to and from the plan area/ development site(s) will be managed, so that flood risk will not be increased overall, and that opportunities to reduce flood risk, for example, through the use of sustainable drainage systems where appropriate, are included in the plan/order’.

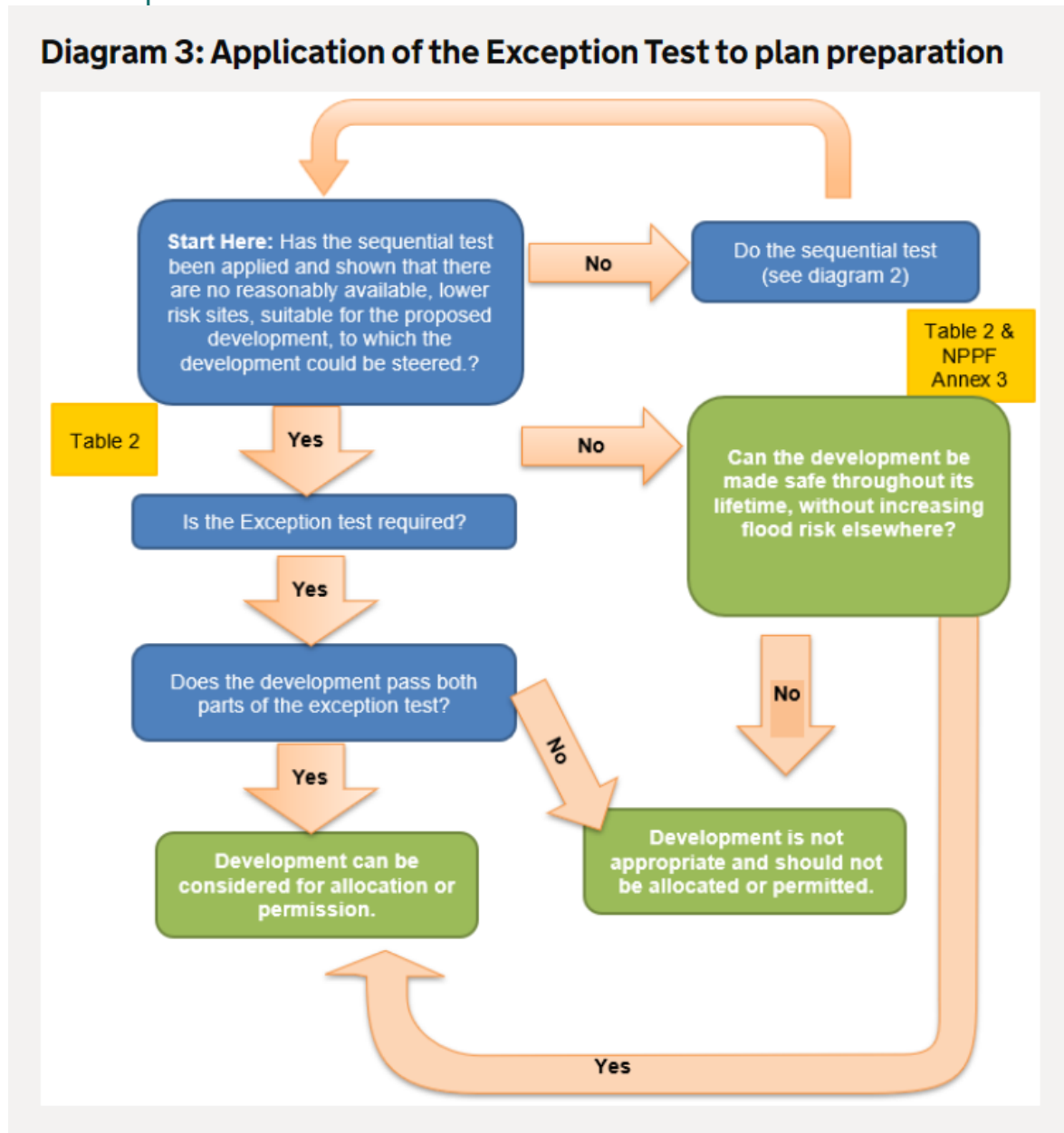
What is the aim of the Sequential Test for the location of development?

3. Paragraph 168 of the National Planning Policy Framework states:

‘The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding’.

4. The sequential test process is detailed below.

Diagram 3: Application of the Exception Test to plan preparation



Source: NPPG Flood Risk and Coastal Change

SEQUENTIAL TEST - EVIDENCE BASE

Evidence Base – Strategic Flood Risk Assessment

- The application of the sequential in this report is informed by the evidence available to Huntingdonshire District Council (HDC) during the examination of the Adopted Local Plan. This includes the Huntingdonshire Strategic Flood Risk Assessment (SRFA) Level 1 and 2 (June 2017), including level 2 detailed site assessments for those sites that were considered potential local plan allocations at that time. The level 2 detailed site assessments did not include the consideration of allocation sites in Great Staughton. The SRFA can be located [here](#).

6. HDC are undertaking a revised SFRA to support the Local Plan review. The outputs are not published. HDC has confirmed that the site south of 29 The Green has been assessed and will be progressing to a Level 2 SFRA to assess the surface water flood risk on site (it is still within flood zone 1). The outputs of the Level 2 SFRA are not expected until late 2024.

Evidence Base – Site Options and Assessment Report May 2023 and November 2023.

7. The allocation of housing and mixed use sites in Great Staughton Neighbourhood Plan has been informed by the Site Options and Assessment Report May 2023. The report was updated in November 2023 to take on board surface water flood data which had not been considered in the May 2023 version of the report. This particularly relates to sites within Huntingdonshire District Council's Housing and Employment Land Availability Report which informed the adopted Local Plan. The Site Options and Assessment Report, updated November 2023 is available [here](#).

Evidence Base – Environment Agency and LLFA mapping on Government website

8. Information on Flood Risk has been obtained via Government Fluvial Water Risk website.
9. Mapping of surface water flood risk in Huntingdonshire has been taken from the updated Flood Map for Surface Water (uFMfSW) published online by the Environment Agency. These maps are intended to provide a consistent standard of assessment for surface water flood risk across England and Wales in order to help Cambridgeshire County Council as Local Lead Flood Authority (LLFAs), the Environment Agency and any potential developers to focus their management of surface water flood risk. The uFMfSW is derived primarily from identifying topographical flow paths of existing watercourses or dry valleys that contain some isolated ponding locations in low lying areas. They provide a map which displays different levels of surface water flood risk depending on the annual probability of the land in question being inundated by surface water.
10. The Environment Agency has commented on SEA Screening Report and the SEA Environmental Report. The full comments are available in the Consultation Statement which accompanies the Submission version of the Neighbourhood Plan. It notes the inclusion of the 'Policy GSNP 15 - Surface Water Flood Risk' is supported by the LLFA as it covers the importance of managing surface water runoff in new developments. The response includes the following statement:

We have significant concerns over the allocation of NP4 in terms of the surface water flood risk present on the site. The sequential test requires that developments are located in areas of the lowest flood risk feasible. NP4 is at high risk of flooding, whereas site NP8 and NP5 are at lower risk of flooding. You need to ensure that clear evidence has been provided on how the sequential test process has been followed in allocating sites in this plan. If NP4 passes the sequential test and remains an allocation proposal, it will also need to be demonstrated that the design can be made safe, without increasing the risk of flooding. We are concerned that the space that will be needed to provide mitigation measures has not been considered when determining the quantum of development that can occur on this site. Given the high levels of flood risk on this site, the mitigation measures may be extensive. Given that the flood water is coming from the surrounding area, a drainage strategy is not sufficient to manage this unless large volumes of attenuation is provided.

Climate change will likely increase the risk of surface water flooding. To be in line with Policy GSNP15 of this Plan, the allocation of NP5 will have to demonstrate that the impact of climate change has been considered. Allocating this site is a significant risk at this time.

We feel that before this site can be allocated, a site-specific Flood Risk Assessment needs to be undertaken to demonstrate that the flood risk can be safely managed, without increasing the risk to the neighbouring areas. Without this, we would not support the allocation of this site.

Evidence Base – Local Lead Flood Authority

11. Cambridgeshire County Council as Local Lead Flood Authority has commented on the Regulation 14 Great Staughton Neighbourhood Plan 2036 and the SEA Environmental Report. The full comments are available in the Consultation Statement which accompanies the Submission version of the Neighbourhood Plan. It notes the inclusion of the 'Policy GSNP 15 - Surface Water Flood Risk' is supported by the LLFA as it covers the importance of managing surface water runoff in new developments.
12. The LLFA notes that in Great Staughton, it appears fluvial flood risk and surface water flood risk is of concern. Flood Risk Maps could be utilised to show potential flood risk within Great Staughton, and the specific locations that are most at risk. Following the Regulation 14 consultation, the Parish Council has engaged with the LLFA to more fully understand the impact of the proposed developments on the water environment. In respect of the SEA response LLFA states:

Summary of Appraisal Findings appears to indicate that 4/5 sites are at high risk of surface water flooding. It is noted that sequential testing for the is ongoing. Please note, discussions on the Exception Test should not be taking place until the Sequential Test is undertaken and passed. The LPA ultimately decides whether the site is sequentially acceptable. The LLFA is a statutory consultee to the LPA. Please note, we expect a full flood risk assessment and/or surface water drainage strategy to be submitted to support any planning application.

Paragraph 023 of the updated PPG states that the aim of the sequential 'approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding.' The LLFA have concerns that most of the sites allocated are at risk of surface water flooding, in particular NP4 (The Green) which is allocated for housing which appears to have a large surface water flow path traversing the site. It is noted that the LLFA commented on an FRA for the site (The Green) as part of the Neighbourhood Plan before.

13. The current maps for fluvial and surface water flooding are available on the Government website.

SEQUENTIAL TEST

14. The broad approach taken to applying the sequential test to individual sites and the package of sites reflects the approach taken in the Huntingdonshire Local Plan. Notably, the Sequential Test has been completed in accordance [Huntingdonshire's Flood and Water SPD](#) (Pages 31 to 37) which provides guidance on how to undertake the sequential test.

Stage A – Area of Search

15. NPPG advises that the Sequential Test will need to determine an appropriate area of search, based on the development type proposed and the relevant spatial policies.
16. Stage A of the Huntingdonshire Flood and Water SPD requires, in this instance, the Parish Council to agree the geographical area over which the sequential test is applied. In terms of the geographical scope, it is appropriate to use the neighbourhood plan area which is the parish of Great Staughton. This has been agreed with Huntingdonshire District Council as an appropriate area for the Sequential Test. The Environment Agency has commented that the parish boundary appears appropriate given the scale of the plan.
17. The geography of the test takes on board and reflects the issues that the Neighbourhood Plan is seeking to address. In accordance with paragraph 68 of the National Planning Policy Framework (NPPF), HDC have supplied the Parish Council with an indicative housing requirement figure for the period between 2011 and 2036. The indicative housing figure for the parish of Great Staughton is 60 dwellings.
18. Monitoring data up to 31 March 2023 shows that there has been a total of 25 dwellings completed (net) in the parish between 1 April 2011 and 31 March 2023. There are a further 5 homes with planning permission (net) yet to be completed. This means that approximately 30 of the 60 homes needed to meet the indicative housing requirement have already been met, leaving 30 homes required for the remaining period up to 2036.
19. The District Council has confirmed that a further 30 homes are required to meet the indicative housing requirement as part of the Parish's contribution to the implementation of the Huntingdonshire Local Plan. The Parish Council, through the Neighbourhood Plan, wants to ensure that proposed development to 2036 meets the needs of residents; provides the infrastructure and services that are needed; ensures that development is high quality; and safeguards those important habitats, green spaces and buildings that are important to Great Staughton's community.
20. Additionally, the Neighbourhood Plan is seeking to find suitable accommodation for a doctor's surgery to replace provision in the village which is not meeting the needs for current healthcare and which is likely to be absorbed back into the existing residential use.
21. It is considered that the parish geography is the most functionally appropriate area for the sequential test and aligns with the geography of the objectives in the Neighbourhood Plan.

Stage B – Reasonably Available Sites

22. NPPF advises that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
23. NPPG advises that the applicant will need to identify whether there are any other 'reasonably available' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market.
24. Similarly, the Huntingdonshire Flood and Water SPD requires an identification of the reasonably available sites. It comments a site is only considered to be reasonably available if all of the following apply:
- The site is within the agreed area of search;
 - The site is not safeguarded in the relevant Local Plan for another use;
 - It does not have any issues (e.g. constraints or designations) that cannot be overcome and that would prevent development on the site.
25. The Parish Council has completed a robust process in accordance with national guidance and the district council's advice. Firstly, the Parish Council has identified all potential alternative sites, and then assessed whether there are any constraints which cannot be overcome which would preclude development of the site.
26. As part of the preparation of the draft Neighbourhood Plan, the Parish Council commissioned AECOM to prepare a Site Options and Assessment Report. The most recent report is available [here](#).
27. The site assessment considered sites from two sources: sites submitted from the Neighbourhood Plan Call for Sites between August and October 2022 (eight sites) and additional sites assessed through the Huntingdonshire HELAA (2017) which were not resubmitted to the neighbourhood plan call for sites (two additional sites). These sites are:
- NP1 / HELAA 148 Brook Farmyard, The Highway
 - NP2 Unit 4 Little America Industrial Estate
 - NP3 Robins Hangar and Pooh's Corner, Little America Industrial Estate
 - NP4 / HELAA050 Land south of 29 The Green, Great Staughton
 - NP5 / HELAA012 Land between 20 Cage Lane and Avery Hill, Great Staughton
 - NP6 GSN Conservatories, Pertenhall Road
 - NP7 Site is located on Perry Road /B661
 - NP8 Perry Road / B661, Great Staughton
 - NP9 / HELAA113 Rear of 69 The Highway
 - NP10/ HELAA149 West of Cage Lane and Moory Croft
28. The location of the ten sites is detailed in the following 3 figures below extracted from the AECOM report.

Figure 5.1 All sites in the neighbourhood area

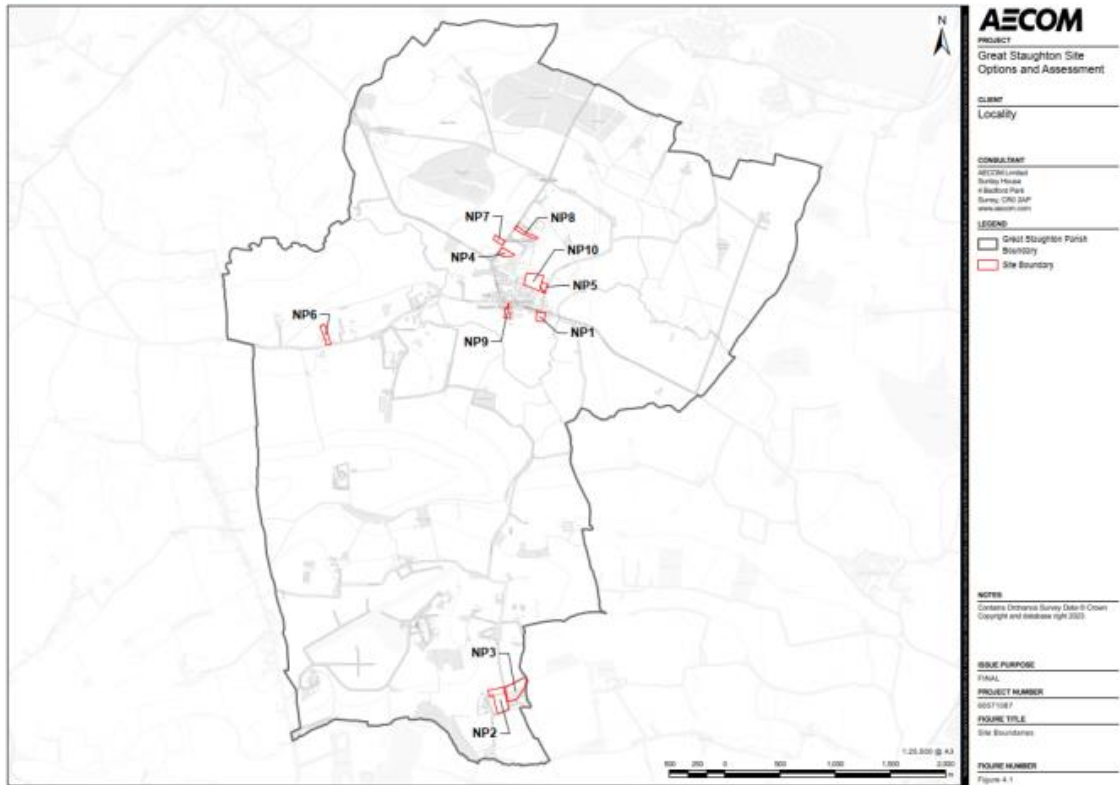
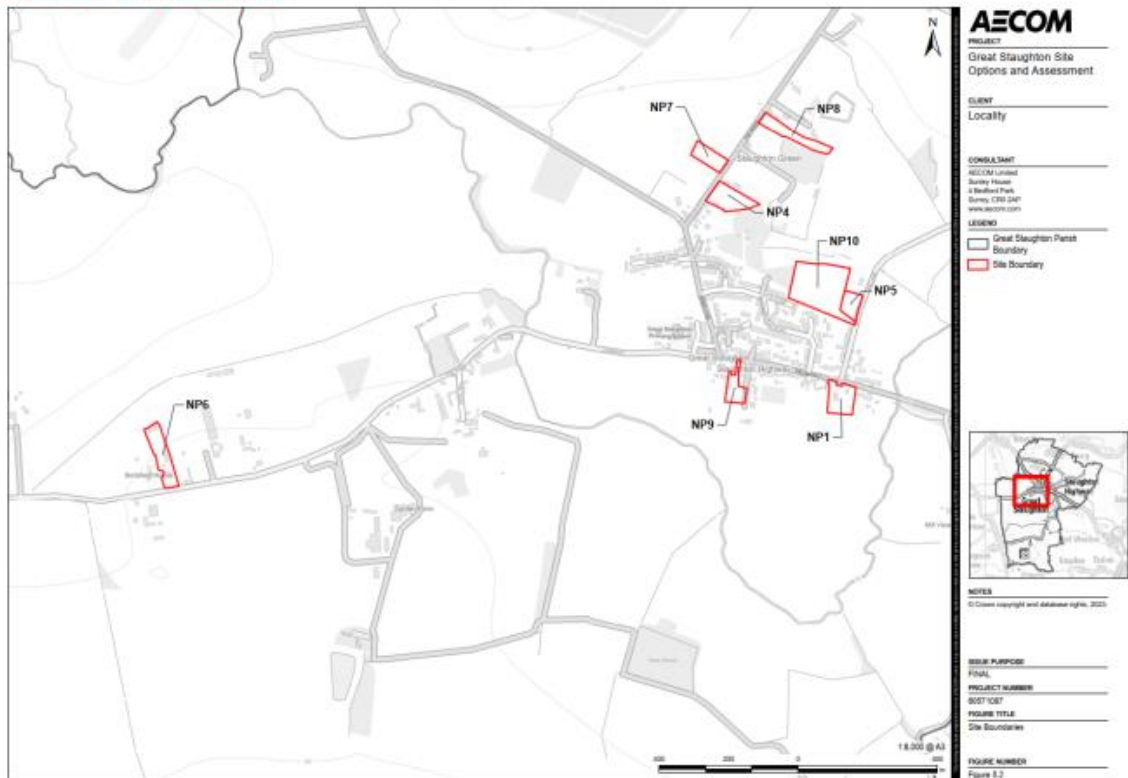


Figure 5.2 Great Staughton sites (north)



Prepared For: Great Staughton Parish Council

Figure 5.3 Great Staughton sites (south)



29. The following table details the analysis contained within Sites Options and Assessment Report which reports on any constraints or designations on each of the sites. It identifies where any constraints cannot be overcome which would preclude development of the site. For the purposes of the sequential test, two sites have been removed from the selection process at this stage. Site NP 9 is removed as the site is under development for residential development following an appeal decision. Site NP 10 is removed as the site has not been confirmed as being available through the Neighbourhood Plan process.

Site	The site is within the agreed area of search	The site is not safeguarded in the relevant Local Plan for another use	It does not have any issues (e.g. constraints or designations) that cannot be overcome and that would prevent development on the site.	Outcome
NP1	Yes	Yes	<p>Yes - The site is previously developed land within the built-up area and is well related to services within the village. There is an existing dwelling on site which would need to retain / share access with any new development. There is a water pumping station adjacent to the existing entrance which would reduce the developable area. The SSSI Risk Impact Zone and Grade 3 agricultural land classification would need to be considered in a planning application and development should avoid a TPO on site. Parts of the site on the eastern and western boundaries are within high and medium areas of surface water flood risk. A sequential test and if necessary, an exception test may be required to demonstrate development is appropriate.</p> <p>The site is potentially suitable for a health facility with associated car parking and other small business, or community uses if the constraints identified in the HELAA including landscape and heritage impacts were mitigated through design. There is flexibility on the land uses proposed on the site and also the possibility of extending development into the field to the rear (0.2 hectares). If additional residential was considered to subsidise community facilities on site the landscape and visual impacts would need to be considered. Demolition and site remediation would also affect development viability. There is extant permission for one dwelling in the southern section of the site. This conclusion is a departure from the HELAA conclusion as the Site Options and Assessment's review of existing information demonstrated that the constraints identified in the HELAA could potentially be mitigated through sensitive design. An appropriate scale of development may improve the visual impact of a brownfield site currently in industrial/retail use.</p>	Proceed to sequential test

Site	The site is within the agreed area of search	The site is not safeguarded in the relevant Local Plan for another use	It does not have any issues (e.g. constraints or designations) that cannot be overcome and that would prevent development on the site.	Outcome
NP2	Yes	Yes	The site is within an SSSI Impact Zone and therefore consultation with Natural England is required for discharge of water or liquid waste. It is within a Drinking Water Safeguard Zone. A bridleway runs along the southern boundary of the site. There are veteran/ ancient trees within the site. The site is greater than 1200m from the local centre. There are no constraints or designations that would preclude development.	Proceed to sequential test
NP3	Yes	Yes	The site is within an SSSI Impact Zone and therefore consultation with Natural England is required for discharge of water or liquid waste. It is within a Drinking Water Safeguard Zone. The site is Grade II agricultural land. A bridleway runs along the northern and western boundary of the site. There are veteran/ ancient trees within the site. The site is greater than 1200m from the local centre. There are no constraints or designations that would preclude development in principle.	Proceed to sequential test
NP4	Yes	Yes	The site is potentially suitable for a small amount of development and therefore for allocation in the neighbourhood plan. Recent planning applications have been refused due to impact on the countryside. However, as a new development of 12 homes is under construction to the north of the site, the impact may be reduced. There are a number of constraints identified in the HELAA which need to be addressed such as the transport impact on the road and infrastructure capacity. There is a pole mounted electric transformer unit on the boundary of the site which would need to be designed around. Parts of the site are within an area of high surface water flood risk. A sequential test and if necessary, an exception test may be necessary to demonstrate development is appropriate.	Proceed to sequential test

Site	The site is within the agreed area of search	The site is not safeguarded in the relevant Local Plan for another use	It does not have any issues (e.g. constraints or designations) that cannot be overcome and that would prevent development on the site.	Outcome
NP5	Yes	Yes	The site is potentially suitable for a small amount of development and therefore for allocation in the neighbourhood plan. There are a number of constraints identified in the HELAA which need to be addressed as part of a planning application. The site has a low risk of surface water flooding. The site may be a sufficient size to accommodate community uses (health centre) with parking but is unlikely to be big enough for the supporting residential use on this land only.	Proceed to sequential test
NP6	Yes	Yes	The site is within an SSSI Impact Zone and therefore consultation with Natural England is required for discharge of water or liquid waste. It is within a Drinking Water Safeguard Zone. The site is within an area of Priority Species for CS targeting – Lapwing Arable Assemblage Farmland Birds species. There are veteran/ ancient trees within the site. The site is greater than 1200m from the local centre. There are no constraints or designations that cannot be overcome.	Proceed to sequential test
NP7	Yes	Yes	This is a greenfield site adjacent to the built-up area and is well related to services and facilities. In line with policy LP9, proposals on land well-related to the built-up area may be supported. There is also a housing development being built on the site opposite this for 12 dwellings. There is potential for some development to be located on the site however this would need to be well screened to ensure the landscape and visual impact is mitigated and that the development would not negatively impact the allotments on the western side of the site. The site is grade 3 agricultural land and there are several trees and hedgerows which would need to be removed to upgrade access to the site.	Proceed to sequential test

Site	The site is within the agreed area of search	The site is not safeguarded in the relevant Local Plan for another use	It does not have any issues (e.g. constraints or designations) that cannot be overcome and that would prevent development on the site.	Outcome
			Parts of the site are within areas of medium and high surface water flood risk. A sequential test and if necessary, an exception test may be necessary to demonstrate development is appropriate. The site is potentially suitable for development if access can be achieved, and the identified constraints resolved or mitigated.	
NP8	Yes	Yes	This is a greenfield site, close to, but not within or adjacent to the continuous built-up area. The site could be suitable for a small amount of development under policy LP 9 as a site which is well related to the built-up area. There is development to the east of site which means that views will not be interrupted. The site is long and narrow so may be difficult to accommodate more than 2-3 homes and access would need to be upgraded to facilitate development. There are powerlines on site which may need to be relocated. The south eastern boundary of the site is within an area of high surface water flood risk. A sequential test and if necessary, an exception test may be necessary to demonstrate development is appropriate. The site is potentially suitable for a small amount of development if the identified constraints can be resolved or mitigated.	Proceed to sequential test
NP9	Yes	Yes	The site has been developed under appeal ref: APP/H0520/W/19/3233872, therefore is not considered in the assessment.	Do not proceed to sequential test
NP10	Yes	Yes	The site is unsuitable for allocation as availability has not been confirmed.	Do not proceed to sequential test.

30. Each of these remaining 8 sites (NP1 to NP8), given the information available, meet the first three criteria set out in Stage B of the Huntingdonshire Flood and Water SPD:
- The sites are within the agreed area of search – the Parish of Great Staughton
 - The sites are not designated in the Local Plan for another use
 - There are no constraints or designations which cannot be overcome
31. Each of the remaining 8 sites is assessed against fluvial flooding, surface water flooding, and groundwater impacts.
32. For the purposes of this assessment the following assessments have been used.
33. For Surface Water Flooding and Fluvial Flooding, the most recent Environment Agency maps have been used to define the areas of surface water flooding. The Site Options and Assessment Report has also identified the fluvial and flood risk on each of the sites. That assessment is reported in the table below.
34. The SRFA identified surface water risk categories. The update Flood Map for Surface Water (uFMfSW) notes the sites within categories: High, Medium, Low and Very low risk of flooding. The definition of each category is described below:
- High Flooding occurring as a result of rainfall with a greater than 1 in 30 chance in any given year (annual probability of flooding 3.3%)
 - Medium Flooding occurring as a result of rainfall of between 1 in 100 (1%) and 1 in 30 (3.3%) chance in any given year.
 - Low Flooding occurring as a result of rainfall of between 1 in 1,000 (0.1%) and 1 in 100 (1%) chance in any given year.
 - Very Low Flooding occurring as a result of rainfall with less than 1 in 1,000 (0.1%) chance in any given year.
35. The SRFA also provides information on Ground water flooding. Mapping of groundwater flood risk has been based on the Areas Susceptible to Groundwater (AStGW) dataset. The AStGW dataset is a strategic-scale map showing groundwater flood areas on a 1km square grid. It shows the proportion of each 1km grid square, where geological and hydrogeological conditions indicate that groundwater might emerge. It does not show the likelihood of groundwater flooding occurring and does not take account of the chance of flooding from groundwater rebound. This dataset covers a large area of land, and only isolated locations within the overall susceptible area are actually likely to suffer the consequences of groundwater flooding. The SFRA confirms that it should not be used as sole evidence for any specific flood risk management, land use planning or other decisions at any scale. However, the data can help to identify areas for assessment at a local scale where finer resolution datasets exist.
36. For the avoidance of doubt, the tables below reflect the current information on flood risk available to the Parish Council. No further assessment has been completed at this stage on the additional risk associated with climate change.

Site	Name	Area	Type of development	Surface Water Flooding	Flood Zone	uFMfSW	Ground Water Flooding	Comment
NP1 / HELAA 148:	Brook Farmyard, The Highway	0.8	Mixed use for housing and community use	Marginal area on the northern boundary is within high and medium risk areas of surface water flood risk	Wholly within Flood Zone 1	1,000 year extent shown on narrow strip fronting The Highway and extends marginally into the northern boundary of the site	≥ 50% < 75%	<p>The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding.</p> <p><15% of the site is affected by medium or high risk surface water flooding. The site therefore has a Low Risk of Surface Water Flooding.</p> <p>The surface water issues are contained to the north of the site, and criteria should be applied to ensure that a suitable surface water drainage strategy is implemented to safeguard access and egress to the site.</p>
NP2:	Unit 4, Little America Industrial Estate	5.10	Industrial Start up Units	Less than 15% of the site is affected by medium or high risk flooding. It is low risk of surface water flooding	Wholly within Flood Zone 1 – low risk	Land on the eastern boundary lies within a 1,000 year extent.	≥ 25% < 50%	<p>The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding.</p> <p>The site has a low risk of fluvial or surface water flooding.</p>
NP3:	Robins Hangar and Pooh's Corner, Little America	2.5	Workshops	Less than 15% of the site is affected by medium or high	Wholly within Flood Zone 1 – low risk	Boundaries to the north and west of the site are	≥ 75%	The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding.

Site	Name	Area	Type of development	Surface Water Flooding	Flood Zone	uFMfSW	Ground Water Flooding	Comment
	Industrial Estate			risk flooding. It is low risk of surface water flooding		within a 30 year extent with less land in the 1,000 year extent.		The site has a low risk of fluvial or surface water flooding.
NP4 / HELAA 050:	Land south of 29 The Green,	0.7	Low density residential development across a net developable area of 85% of the site. Housing with a capacity of approx. 20 dwellings	>15% of the site is affected by medium and high risk of surface water flooding – Medium / High Risk	Wholly within Flood Zone 1	Surface Water path and boundary ditch detailed within 30 year extent and 100 year extent. Remaining parts of the site are within 1,000 year extent	< 25%	A significant part of the site is affected by medium and high risk surface water flooding / surface water flow path. However, the site is proposed to be developed at a lower density to reflect the surface water constraints. The Parish Council will need to be satisfied that the site can be developed having regard to these surface water constraints. Such constraints to be assessed in consultation with the Environment Agency and LLFA. A site specific Flood Risk Assessment will inform the decision making process.
NP5 / HELAA 012:	Land between 20 Cage Lane and Avery Hill,	0.4	Housing with a capacity for 14 dwellings	Low surface water risk	Wholly within Flood Zone 1	Western boundary shown within 30 year extent	≥ 50% < 75%	The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding. The site has a low risk of fluvial or surface water flooding.

Site	Name	Area	Type of development	Surface Water Flooding	Flood Zone	uFMfSW	Ground Water Flooding	Comment
NP6:	GSN Conservatories, Pertenhall Road	0.76	Small business units	Low surface water risk	Wholly within Flood Zone 1	Not identified within 30, 100 or 1,000 year extent	≥ 75%	<p>The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding.</p> <p>The site has a low risk of fluvial or surface water flooding.</p>
NP7:	Perry Road / B661	0.5	Housing with a capacity for 10 dwellings	>15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Wholly within Flood Zone 1	Land to north and east boundaries within 30 year extent. Wider frontage within 100 year extent with 1,000 year extent shown into the site	< 25%	<p>The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding.</p> <p>The site has a medium risk of surface water flooding.</p>
NP8:	Perry Road / B661	0.67	Housing with a capacity for 2-3 dwellings	Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk	Wholly within Flood Zone 1	Parts of the southern boundary are shown within 30, 100 and 1,000 year extent	< 25%	<p>The site is fully within Flood Zone 1 and therefore at low risk of Fluvial Flooding.</p> <p>The site has a low risk of surface water flooding. EA confirmed there is isolated ponding so mitigation should be easier.</p>

Site	Name	Area	Type of development	Surface Water Flooding	Flood Zone	uFMfSW	Ground Water Flooding	Comment
				The south eastern boundary of the site is within an area of high surface water flood risk				

37. The table above confirms the flood risk for each of the sites. However, it is also important to consider the guidance provided by the NPPF. NPPF confirms that 'Reasonably available sites' are those in a suitable and appropriate location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.
38. NPPG confirms that the sequential test should consider whether there are reasonably available lower risk sites, suitable for the proposed development to which the development could be steered. If there are other sites with a lower risk of flood risk that could accommodate the proposed development, this does not necessarily mean that this site should be allocated over another as that site may not conform with the strategic policies of the Local Plan or objectives of the Neighbourhood Plan.

Employment Development

39. For employment or business uses each of the three sites; NP2, NP3 and NP6 are within Flood Zone 1 and therefore at low risk of Fluvial Flooding. The sites are also at low risk of surface water flooding. However, the three sites are not considered suitable for allocation in the Neighbourhood Plan for the proposed employment development as detailed in the Site Options and Assessment Report, November 2023. In conclusion, there are no sites that are reasonably available at a lower probability of flooding that would be appropriate for employment land uses.

NP2 - Unit 4, Little America Industrial Estate

The site at this is a greenfield site adjacent to a small employment area but remote from services, facilities or the strategic road network. The site is in open countryside, outside any defined Established Employment Area in the Huntingdonshire Local Plan and would be contrary to Local Plan policies LP7, LP18 and LP19. The site is therefore unsuitable for the proposed development.

NP3 - Robins Hangar and Pooh's Corner, Little America Industrial Estate

The site at this is a greenfield site adjacent to a small employment area but remote from services, facilities or the strategic road network. The site is in open countryside, outside any defined Established Employment Area in the Huntingdonshire Local Plan and would be contrary to Local Plan policies LP7, LP18 and LP19. The site is therefore unsuitable for the proposed development.

NP6 - GSN Conservatories, Pertenhall Road

The site is currently in industrial / business use and is not a defined Established Employment Area in the Huntingdonshire Local Plan. A proposal for new business development or expansion of an existing business would be supported within its existing operation site under Local Plan policy LP19. This development could come forward via a planning application rather than an allocation as there is no change of use and therefore would not be suitable as a neighbourhood plan allocation

Mixed use for housing and community use

40. Site NP5 – Cage Lane and Avery Hill was assessed within the Site Options and Assessment Report. The Site Options and Assessment Report concludes that although the site has a low risk of flooding it may be of a sufficient size to accommodate uses (health centre) with parking but it is unlikely to be big enough for the supporting residential use on this land only.
41. Site NP1 - Brook Farmyard has a low fluvial and low surface water flood risk. It is noted that the surface water flood risk maps note some flood risk to the site's frontage to The Highway. The issues are contained to the north of the site and criteria should be applied to ensure that a suitable surface water drainage strategy is implemented. Development proposals will need to ensure that safe access and egress can be provided for the lifetime of the development. Safeguarding criteria is appropriate in allocating the site for Community Uses. In conclusion, Site NP1 – Brook Farm is reasonably available at a lower probability of flooding that would be appropriate to mixed use for housing and community uses.

Residential Development

42. The Environment Agency has recommended that sites that are at low risk of flooding from both rivers and surface water (i.e. NP1 and NP5) are assessed for allocation prior to consideration of NP8 and then NP4 and NP7. This approach to assessing the sequence of sites reflects the level of flood risk on each site in accordance with national policy.
43. However, it is important to note that any site must be in compliance with the strategic policies of the Local Plan in order to pass the Basic Conditions tests. Therefore, the Neighbourhood Plan, as a whole, is required to be in general conformity with the strategic policies of the Local Plan. The consequence of this is that even if a site is at a lower risk of flooding, it is not likely to be developed because it is not in compliance with the Local Plan nor achievable in terms of delivering the objectives of the Neighbourhood Plan. The following section assesses the sites as recommended by the Environment Agency whilst considering the conformity of the sites with the strategic approach in the Local Plan.

Site NP1 – Brook Farmyard

44. The site has a low fluvial and surface water flood risk. The site is proposed to be allocated in the Neighbourhood Plan as a mixed use site which includes a health care facility. Residential development which enables the facility to come forward on the site will be supported.

Site NP5 Cage Lane

45. The site is at low risk from fluvial or surface water flooding. This site is an extension into the countryside with a gap between the existing development and the proposed site. The community considers, as expressed at the Parish Assembly, that the site has more difficult issues with access. The community considers that Cage Lane is a narrow road with a narrow access on to the B645. It has current parking issues as some houses do not have driveways which limits width even more. There are few options for widening as houses are close to the road at various points. It is the community and Parish Council's view that additional traffic along this road from an additional 12 properties would add significant highway and transport safety issues. The Parish Council has had regard to the applicant's Transport Assessment – see Consultation Statement. The Parish Council has considered

that although the site has a lower risk of flooding, it is not appropriate for the development proposed.

NP 8 The Green

46. The site has a low risk of surface water flooding. EA confirmed there is isolated ponding so mitigation should be easier to address. However, the site is too small to make any significant development possible. It also is separated from the rest of the village and therefore would not comply with the strategic objectives of the Local Plan.

Site NP7 Perry Road (north side of The Green)

47. The site is identified as medium risk of surface water flooding and low risk of fluvial flooding. The Environment Agency has confirmed that sites NP4 – South of The Green and NP7 Site at Perry Road (north of The Green) are both impacted by the same surface water flow path that is caused by an overland flow path from the west that appears to be blocked by 'The Green' which then overtops and continues across site NP4. Therefore, site NP7 is considered to have the same flood risk as site NP4.
48. This site has a potential reasonable access to the B661. By being on the north side of The Green it was felt less desirable as residents would have to cross the B661 to reach the footpath. It also was felt less desirable to develop on this side of the B661 in terms of continuity of the village envelope and built up area of the village.

Site NP4 – south of 29 The Green

49. The site has areas of low, medium and high risk surface water flooding across the site and low risk of fluvial flooding. A surface water flow path that is caused by an overland flow path from the west that appears to be blocked by 'The Green' and which then overtops and continues across site NP4. There are indicators that the ordinary watercourse that runs along the southern boundary of NP4 may pose a risk of flooding to the site. The flood map for surface water indicates that this flooding will occur before The Green (B661) is overtopped.
50. Site NP4 is considered to be better related to the built up area and the other residential development in the immediate area and better aligned with the strategic policies in the Local Plan.

Interim Conclusions

51. The evidence above demonstrates the sites that are sequentially preferable in terms of their flood risk (NP5, NP8 and NP1) are not suitable for primarily residential development and would not be in accordance with the strategic policies in the Local Plan nor meet the objectives of the Neighbourhood Plan itself.
52. At this point in the process, the three sites proposed for residential development, albeit at a lower risk of flooding, are removed from the sequential test as they are not considered to be suitable and in appropriate locations for the type of development proposed to align objectives of the Neighbourhood Plan.
53. Sites NP4 and NP7 are impacted by the same surface water flow path and flood risk. However, site NP4 has been determined by the Parish Council as the preferable site in

terms of its suitability for residential development to meet the needs of the community and secure a Neighbourhood Plan which meets the broader Basic Conditions.

Further consideration of NP4 – South of 29 The Green

54. NP4 – south of 29 The Green has identified surface water flood risk constraints. As the Neighbourhood Plan has progressed, the Parish Council has engaged key stakeholders on the flood risk issue.
55. The Environment Agency Assessment and mapping is based on broadscale modelling so there are significant uncertainties associated with this. The risk may be greater or smaller than this once a site-specific assessment has been carried out. The flood risk assessment in the tables above have not taken into account residual risks like culvert blockages. Climate change will also likely increase the risk of flooding.
56. The Environment Agency recommended that a site-specific flood risk assessment should be carried out to determine the surface water flood risk on the site prior to allocation in the Neighbourhood Plan.
57. The Environment Agency states that should, following the sequential test and further assessment of the proposed sites, it is deemed that NP4 is the preferred sites, then appropriate policies should be put in place to ensure that the flood risk is assessed in detail and that mitigation measures are put in place to ensure no internal flooding and no offsite impacts.
58. Cambridgeshire County Council as Local Lead Flood Authority has also commented specifically on Site NP4. It states that the land to the south of 29 The Green is located in an area of flood risk. However, the LLFA would like express that the site has varied levels of surface water flood risk, ranging from high to low, rather than just low.
59. The LLFA states that the majority of the site is at low, medium and high risk of surface water flooding. There appears to be an overland flow path traversing the site with a high risk of surface water flooding. We are concerned that the overland flow path may have access and escape implications because of its extent and location.
60. The LLFA confirms that as highlighted in section 4.3 of the SPD (adopted by HDC), the Sequential Test would be required for any planning application on this land to be undertaken and the results submitted to the LPA for assessment.

NPPF considerations

Paragraph 165. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 173. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan

Site Specific Flood Risk Assessment – South of 29 The Green

- 61. HDC and the Environment Agency have confirmed that an Exception Test is not required (email to Parish Chairman 4th February 2024). This is addressed in more detail below. As an exception test is not required, it is appropriate to consider here whether the development could be made safe for its lifetime without increasing flood risk elsewhere.
- 62. The landowner has prepared a Site Specific Flood Risk Assessment for Site NP4 prepared by MTC Engineering (Cambridge) Ltd dated February 2024. The report includes a detailed description of the topography of the site and the existing site levels, drainage systems and watercourse. It states:
 - 2.11 The site itself is lower than the adjacent road, with levels in the order of 26.5 to 26.6m AOD along the northwestern boundary of the site having an overall fall in an easterly/southeasterly direction towards a low point of approximately 25.75m AOD in the eastern corner, however levels rise slightly above this to a minimum of 26.06m AOD at the top of the bank down to the adjacent drain, essentially creating a low spot on the site.
 - 2.12 Levels along the southern part of the site boundary particularly in the vicinity of the existing building are generally higher than those to the north. A number of small isolated low spots are present on the site in the central area, as shown on the site survey and by the contour lines, however these are generally shallow with a maximum depth of 300mm present at any point before water would flow southwest again towards the drain.
- 63. The report confirms that the site lies completely within Flood Zone 1. There are no further fluvial flood risks to the site and the overall risk of flooding from the fluvial sources assessed is above considered to be low.
- 64. This site is located a significant distance inland and at levels in excess of 25m AOD, thus it is not considered to be at any significant risk of flooding from the sea.
- 65. The report then considers surface water flood risk. It states:
 - 3.16 During extremely intense rainfall events where the evapotranspiration and percolation potential of the ground is exceeded, prolonged wet periods when ground becomes waterlogged, or following cold or hot periods in which ground has become frozen or baked, additional water is likely to also likely to flow over the land surface to

drains as run off, then flow along the route of these drains towards the River Kym, with some ponding in local low spots during this process also occurring.

66. A site visit on 8th January 2024 after extremely heavy rainfall confirmed there was no surface water flooding present on the main body of the site. The report confirms:

3.18 Surface water mapping (Appendix 5) indicates that in a high risk (1 in 30 year) event water will back up on the opposite side of The Green to the site, with very limited flow over The Green which will start to act as a weir in this event. Water coming over The Green at the low point in the central area of the site is however indicated as being picked up by the drain on the site side of The Green, with no significant overspill on the site side of the drain which appears to remain within capacity.

3.19 The only other area of the site shown as at risk of flooding in a 1 in 30 year event is limited ponding in the southern and central low spot, where as shown on the site survey the low point is approximately 25.98m AOD, whilst a water level of approximately 26.3m AOD would be required before surface water could begin entering the drain along the southern boundary of the site based upon surveyed bank levels. As such all water would generally be of a depth of 300mm or less with the exception of a very small area at the very deepest part of the low spot, which is as indicated in this area of the site in the 1 in 30 year event.

3.20 A very small area of flooding may also be present in the very eastern corner of the site which again is another low spot with a minimum level of 25.75m AOD, but water level of approximately 26.1m AOD required before water can begin flowing into the adjacent drain. As such this area would again be almost entirely less than 300mm depth other than the very lowest area.

67. The report concludes that there is not considered to be any significant risk of flooding from a 1 in 30 year event post development. It also concludes that medium risk or 1 in 100 year event mapping indicates that a limited flow of water may begin coming across The Green in the northern corner of the site, and begin flowing south across the site as a shallow flow not exceeding 300mm depth, before ponding in the same low spot as noted above in relation to the 30 year event before reaching a level at which it can enter the drain along the southern boundary at which point it will enter the drain then begin flowing east in the drain.

68. The Flood Risk Assessment concludes that any development will need to ensure that the existing flow path across the site is not obstructed by designing a flow path around the boundary or through the site, and secondly, that finished floor levels are sufficiently set above adjacent ground levels (at least 300mm) with external levels falling away and no low spots in the vicinity of the access points in which water could pond to a level where it could potentially enter any dwelling.

69. The system would also need to be designed to a 1 in 100 year plus 40% climate change rainfall event. The Flood Risk Assessment concludes that subject to the suitable design of the site layout and external levels all surface water risks can be adequately managed or mitigated as part of any residential development.

70. The overall risk of flooding occurring at the site from blocked, overloaded or burst sewers and watermains is therefore considered to be low.

71. There are no reservoirs, canals, or other artificial sources of water in the vicinity of the site that are considered to give rise to any significant risk of flooding at the site, and Environment Agency mapping does not indicate any flood risk to the site from reservoirs.

72. The Specific Site Flood Risk Assessment states that the development proposal will need to be accompanied by measures to ensure that there is no adverse impact upon the off site risk of flooding associated with the development

- SuDS system designed to accommodate a 1 in 100 year plus 40% rainfall event to greenfield discharge rates. This will both resolve any potential issues associated with minor ponding that may occur at the site in low spots during a 1 in 30 year event at present, and secondly ensure that there is no increase to discharge rates and thus no adverse impact upon the downstream risk of flooding.
- the flow route across the site in an easterly/southeasterly direction will be maintained through the development, most likely by either running swales around the edges of the site to take flows coming on to the site from the northwest east around the main body of the site to the point at which they currently re enter the drain along the southern boundary and eastern corner of the site. Alternatively the existing drains may be improved to give extra capacity and pick up the flows, or a new drain created along the northeastern boundary of the site.
- finished floor levels of all dwellings will be set at least 300mm above existing ground levels and external levels all designed to ensure that water will not pond in the vicinity of any access point or enter any dwelling under any circumstances.

73. The Site Specific Flood Risk Assessment has been shared with HDC, the Environment Agency and Cambridgeshire County Council as Local Lead Flood Authority. It will be publicly available as part of the Neighbourhood Plan documents submitted to HDC .

74. The Environment Agency responded to a short consultation on the FRA on 5th March, 2024 stating:

'A detailed review of the FRA would fall under our charged-for pre-application advice service as it falls outside the formal planning process.....

However, I have passed the FRA on to our flood risk specialist for their initial thoughts, which are as follows:

- a. There is no new modelling undertaken so it is based on a site visit, a more comprehensive review of the site and hydrology. So, it might be more informative, but it might not be more definitive.
- b. It proposes that because it didn't flood during recent wet weather, that it's not at risk of flooding. This is a faulty assumption as multiple characteristics impact whether a specific event triggers flooding.
- c. It proposes that mitigation measures could reduce the risk to this site. This is not relevant when determining the sequential test as mitigation measures are only part of the exception test.

Please be advised that these conclusions are based on a quick look at the FRA and a more detailed review would be required to provide a more definitive response. We recommend the FRA be submitted by the site promoter for review prior to allocation given the potential flood risk implications'.

75. In response to a further enquiry in response to the Environment Agency's comments on the SEA Environmental Report, the following comments were made:

The flood risk specialist's preliminary review of the FRA for the housing site at The Green concluded that it does not provide a comprehensive evidence base for a site at high risk of surface water flooding, as it uses only historic and qualitative observations to counter the conclusions of the Flood Map for Surface Water. Following internal discussion, we have concluded that we cannot provide a detailed review under our charged for Advice Service as we would not respond to planning applications for development at this site at the planning stage. This is because it sits in fluvial flood zone 1 and the concerns are surrounding surface water flooding, which falls under the planning remit of the Lead Local Flood Authority (LLFA). We therefore recommend consulting with the LLFA for their comments on the submitted FRA. You can also read our guidance on preparing an FRA here: Flood risk assessment: flood zones 1, 2, 3 and 3b - GOV.UK (www.gov.uk)

76. The LLFA responded to the consultation on the FRA as follows.

As aforementioned, as highlighted in section 4.3 of the SPD (adopted by HDC), the Sequential Test would be required for any planning application on this land to be undertaken and the results submitted to the LPA for assessment. Please note, discussions on the Exception Test should not be taking place until the Sequential Test is undertaken and passed. The LPA ultimately decides whether the site is sequentially acceptable. The LLFA is a statutory consultee to the LPA.

The LLFA are supportive that the proposed development will include a SuDS system designed to accommodate a 1 in 100 year plus 40% rainfall event to greenfield discharge rates. The LLFA would encourage specific promotion of above-ground open SuDS such as wetlands, attenuation basins, ponds and swales as they provide water quantity, water quality, amenity and biodiversity benefits. Interception source control such rain gardens, bioretention, green roofs and permeable paving should be encouraged on all sites where applicable. Interception source control, as per Planning Practice Guidance, manages increased surface water discharge from developed sites, as close to the source as possible, and minimising the volume of surface water discharge from a site.

The FRA highlights that the flow route across the site in an easterly/south-easterly direction will be maintained through the development by running swales around the site where required. The LLFA support SuDS such as swales to be utilised to intercept and divert flows. Alternatively, the FRA suggests that existing drains be modified to provide more capacity to pick up the flows, or that a new drain be constructed along site's the north-eastern boundary. Please note, under the Land Drainage Act 1991, any person carrying out works on an ordinary watercourse requires Land Drainage Consent from the relevant authority prior to any works taking place.

The site layout should account for the existing drainage infrastructure, ensuring clear access for maintenance of the ditches by a management body. This should include a

suitable easement for any maintenance equipment that may be required for future maintenance works on the ditch.

The FRA highlights that Finished Floor Levels (FFL) will be set to 300mm above existing ground levels and external levels for all properties. The LLFA is supportive of this as FFL of any properties near exceedance routes should be raised to 300mm above surrounding ground levels to protect them from internal flooding.

77. HDC have no additional comments on the Site Specific Flood Risk Assessment and defer to specialist advice on the Flood Risk Assessment.
78. The Parish Council's considered the available information on flood risk at its meeting on 14th March, 2024 and considered the augmented consultation responses and evidence at its meeting on 12th September, 2024. The Parish Council determined after careful consideration it wishes to continue with the proposed allocations GSNP3 – Allocation at Brook Farm and GSNP4 – Allocation for housing at land south of 29 The Green subject to the safeguarding conditions outlined in the Site Specific Flood Risk Assessment.

THE EXCEPTION TEST

What is the Exception Test?

'If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3'.

79. Following a review of Huntingdonshire SPD and the NPPG, it would indicate that as the sites are within flood zone 1, an exceptions test would not be necessary. See table below.

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Source: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2>

80. As the sites lies within Flood Zone 1 and are within classification More Vulnerable, the District Council has confirmed that an Exceptions Test would not be required. The Environment Agency has also confirmed that the exception test is not required for areas at risk of surface water flooding only. However, the Environment Agency does stress that NPPF states that inappropriate development in areas of flood risk should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

SUMMARY OF FINDINGS

81. This report documents the sequential test appropriate to flood risk that has been undertaken to inform the site allocations in the Great Staughton Neighbourhood Plan to 2036.
82. The broad approach taken to applying the sequential test to individual sites and the package of sites reflects the approach taken in the Huntingdonshire Local Plan. Notably, the Sequential Test has been completed in accordance [Huntingdonshire's Flood and Water SPD](#) (Pages 31 to 37) which provides guidance on how to undertake the sequential test.
83. Stage A of the Huntingdonshire Flood and Water SPD requires, in this instance, the Parish Council to agree the geographical area over which the sequential test is applied. The parish boundary of Great Staughton has been agreed with Huntingdonshire District Council and the Environment Agency as an appropriate area for the Sequential Test.
84. Stage B of the Huntingdonshire Flood and Water SPD requires an identification of the reasonably available sites. A site is only considered to be reasonably available if all of the following apply:
- The site is within the agreed area of search;
 - The site is not safeguarded in the relevant Local Plan for another use;
 - It does not have any issues (e.g. constraints or designations) that cannot be overcome and that would prevent development on the site.
85. The site assessment considered sites from two sources: sites submitted from the Neighbourhood Plan Call for Sites between August and October 2022 (eight sites) and additional sites assessed through the Huntingdonshire HELAA (2017) which were not resubmitted to the neighbourhood plan call for sites (two additional sites). These sites are:
- NP1 / HELAA 148 Brook Farmyard, The Highway
 - NP2 Unit 4 Little America Industrial Estate
 - NP3 Robins Hangar and Pooh's Corner, Little America Industrial Estate
 - NP4 / HELAA050 Land south of 29 The Green, Great Staughton
 - NP5 / HELAA012 Land between 20 Cage Lane and Avery Hill, Great Staughton
 - NP6 GSN Conservatories, Pertenhall Road
 - NP7 Site is located on Perry Road /B661
 - NP8 Perry Road / B661, Great Staughton
 - NP9 / HELAA113 Rear of 69 The Highway
 - NP10/ HELAA149 West of Cage Lane and Moory Croft
86. The report details the analysis contained within Sites Options and Assessment Report which reports on any constraints or designations on each of the sites. It identifies where any constraints cannot be overcome which would preclude development of the site. For the purposes of this report, two sites were removed from the sequential test process at this stage. Site NP 9 is removed as the site is under development for residential development following an appeal decision. Site NP 10 is removed as the site has not been confirmed as being available through the Neighbourhood Plan process.
87. Each of the remaining 8 sites is assessed against fluvial flooding, surface water flooding, and groundwater impacts.

88. NPPG confirms that the sequential test should consider whether there are reasonably available lower risk sites, suitable for the proposed development to which the development could be steered. If there are other sites with a lower risk of flood risk that could accommodate the proposed development, this does not necessarily mean that this site should be allocated over another as that site may not conform with the strategic policies of the Local Plan.
89. The three sites proposed for employment development (NP2, NP3 and NP6) have low flood risk. However, the sites are not considered suitable and appropriate or reasonably available for the development
90. Of the two sites proposed for community uses, both sites have a low Flood Risk. The site at Brook Farm is considered to be a suitable and appropriate location. Site NP1 - Brook Farmyard has a low fluvial and surface water flood risk. It is noted is that the surface water flood risk maps note some flood risk to the site's frontage to The Highway. The issues are contained to the north of the site and criteria should be applied to ensure that a suitable surface water drainage strategy is implemented. Development proposals will need to ensure that safe access and egress can be provided for the lifetime of the development. Safeguarding criteria is appropriate in allocating the site for Community Uses.
91. Sites NP1, NP5, NP8 and then NP4 and NP7 are considered in sequence for residential development on the advice of the Environment Agency given the flood risk associated with these sites. Following that assessment Site NP4 south of 29 The Green, although have a higher degree of flood risk than other sites, is considered to be the most appropriate for residential development.
92. Site NP4 – south of 29 The Green has identified surface water flood risk constraints clearly articulated by the Environment Agency and the LLFA. It is the remaining site identified for residential development. The Parish Council must therefore be satisfied that the development can be made safe throughout its lifetime without increasing flood risk elsewhere before sustaining its allocation in the Neighbourhood Plan.
93. The applicant has prepared a Site Specific Flood Risk Assessment for NP4 – South of 29 The Green dated February 2024. The report concludes that the site is at a low risk of fluvial flooding and all sources of flood risk aside from surface water which gives rise to minor on site ponding issues at low spots in more frequent events and provides a flow path in an easterly/southeasterly direction in the most extreme events. However, the assessment does highlight the presence of existing flow paths and watercourses, site levels which could give rise to surface water flood risk.
94. The development proposal will need to be accompanied by measures to ensure that there is no adverse impact upon the offsite risk of flooding associated with the development:
- SuDS system designed to accommodate a 1 in 100 year plus 40% rainfall event to greenfield discharge rates. This will both resolve any potential issues associated with minor ponding that may occur at the site in low spots during a 1 in 30 year event at present, and secondly ensure that there is no increase to discharge rates and thus no adverse impact upon the downstream risk of flooding.
 - the flow route across the site in an easterly/southeasterly direction will be maintained through the development, most likely by either running swales around the edges of the site to take flows coming on to the site from the northwest east around the main body of the site to the point at which they currently re enter the drain along

the southern boundary and eastern corner of the site. Alternatively, the existing drains may be improved to give extra capacity and pick up the flows, or a new drain created along the northeastern boundary of the site.

- finished floor levels of all dwellings will be set at least 300mm above existing ground levels and external levels all designed to ensure that water will not pond in the vicinity of any access point or enter any dwelling under any circumstances.

95. The Environment Agency has raised concerns about the robustness and findings of the Site Specific Flood Risk Assessment. The LLFA have made specific recommendations on the mitigation measures proposed by the Site Specific Flood Risk Assessment. HDC comment that the revised sequential test document provides a more robust assessment and narrative on how the potential allocations have been chosen. However, it has no specific comments on the Site Specific Flood Risk Assessment.

96. The Parish Council determined at its meeting on 14th March, 2024 that it wished to continue with the proposed allocations GSNP3 - Allocation at Brook Farm and GSNP4 - Allocation for housing at land south of 29 The Green subject to the safeguarding conditions outlined in the Site Specific Flood Risk Assessment. The Parish Council reviewed this position at its meeting on 12th September 2024 and after careful consideration of all the additional information re-affirmed its decision to continue with this allocation.