Newcastle-under-Lyme Local Plan – Flood Risk

1. Introduction

This note is provided to illustrate the location of evidence demonstrating the application of the Sequential Test, and where necessary, the Exception Test, in the preparation of the Newcastle-under-Lyme Local Plan 2020-2040 (submitted as CD01). It aims to signpost the Inspector to the relevant documents and sections within the Council's evidence base.

2. National Policy Context

The Newcastle-under-Lyme Local Plan has been prepared in accordance with the National Planning Policy Framework (NPPF, December 2023) and the associated Planning Practice Guidance (PPG). The NPPF requires that Local Plans apply a sequential, risk-based approach to the location of development, steering new development to areas with the lowest probability of flooding (NPPF, para. 167).

3. Local Plan Approach

3.1 Overall Spatial Strategy

The Local Plan's spatial strategy, as set out in Policy PSD1 (Overall Development Strategy), Policy PSD2 (Settlement Hierarchy), and Policy PSD3 (Distribution of Development), prioritises sustainable development within defined settlement boundaries. This approach inherently directs development towards existing urban areas, where services and infrastructure are concentrated, and away from the open countryside, and Green Belt. The spatial strategy seeks to deliver a minimum of 8,000 dwellings and 63 hectares of employment land in the plan period 2020 to 2040 (CD01 Policy PSD1, p13).

- **Relevant Strategic Policies:**
    - Policy PSD1: Overall Development Strategy [CD01, p13]
    - Policy PSD2: Settlement Hierarchy [CD01, p14]
    - Policy PSD3: Distribution of Development [CD01, p.16]
    - Policy PSD4: Development Boundaries and the Open Countryside [CD01, p.18]
    - Policy PSD5: Green Belt [CD01, p.19]

3.2 Site Selection Methodology

The Council undertook a multi-stage site selection process, with flood risk as a key consideration throughout. This process is documented in the following:

- **Strategic Housing and Employment Land Availability Assessment (SHELAA) Methodology (ED006):** This document outlines the initial site assessment criteria, including a 'filtering' stage which excluded sites largely within significant areas of Flood Zone 3. [ED006, paragraph 3.24]. Specifically, the methodology states:

"Flood Risk – Inappropriate development in areas of high flood risk should be avoided by directing development away from areas of highest risk, but where development is necessary then it will need to be made safe from flood risk and also without increasing flood risk elsewhere. Taking the above considerations into account, the SHELAA will apply the

assumptions below. Until up-to-date Strategic Flood Risk Assessments are prepared to establish the extent of Flood Zone 3b, judgements will be made based upon Environment Agency Flood Zone mapping, which does not differentiate between Flood Zones 3a or 3b. Therefore, a precautionary principle that sites in Flood Zone 3 should be treated as 'unsuitable' will be used, unless evidence or modelling suggests otherwise (for example that remediation measures would alleviate adverse consequences). Where sites are only partially within Flood Zones 2 & 3, the area of the site will be reduced to locate development outside of these areas.

  - Environment Agency Flood Zone 1 – 'Suitable'.
  - Environment Agency Flood Zone 2 – 'Potentially suitable' i.e., constrained until an acceptable Flood Risk Assessment is produced.
  - Environment Agency Flood Zone 3 – 'Unsuitable'.

This demonstrates a clear, precautionary, and sequential approach to initial site identification, consistent with the NPPF.

- **Strategic Housing and Employment Land Availability Assessment (SHELAA) Report (ED006a):** This report documents the application of the SHELAA Methodology. It identifies a "pool of sites" considered through the assessment [ED006a, Section 5, p.10], and provides the outcomes of the assessment, categorising sites as either 'deliverable', 'developable', or 'not currently developable'. It explicitly states that inclusion in the SHELAA does not equate to planning permission or allocation (ED006a Paragraph 1.3, p.2). The SHELAA identified potential sites from several sources, including a 'call for sites', analysis of brownfield sites, review of existing planning permissions and review of existing allocations (ED006a, Para 1.6, p2).
- **Level 1 Strategic Flood Risk Assessment (SFRA) (ED013):** The Level 1 SFRA, prepared by JBA Consulting (June 2024), provided a comprehensive, borough-wide assessment of flood risk from all sources, as required by the NPPF. This included consideration of:
  - **Fluvial Flooding:** Using Environment Agency Flood Zones and, where available, detailed hydraulic modelling outputs (e.g., for Lyme Brook and Fowlea Brook).
  - **Surface Water Flooding:** Using the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping.
  - **Other Sources:** Assessing risk from groundwater, sewers, reservoirs, and canals, using available datasets.
  - **Climate Change:** Explicitly considering the potential impacts of climate change on both fluvial and surface water flood risk, in accordance with the latest Environment Agency guidance.
  - **Existing flood defence and their standard of protection.**
  - **Identification of any historic flooding.**
  - **Review of relevant legislation and policy.**

The Level 1 SFRA provided mapping and analysis that was used to inform the initial "sifting" of potential development sites within the SHELAA, as described in the SHELAA Methodology (ED006, p.12). Sites located predominantly within Flood Zone 3 were considered 'unsuitable' at

that initial stage. The Level 1 SFRA also informed the more detailed site assessments undertaken as part of the site selection process (ED029) and provided a baseline for the subsequent Level 2 SFRA.

- **Site Selection Report and Assessments (ED029):** This report details the subsequent stages of the site selection process, after the initial SHELAA filtering. It explains how constraints, including flood risk, were assessed. [ED029, paragraph 2.1]. The process involved:
    - **Stage 1:** Establishing a pool of potential sites through the SHELAA, "call for sites" exercises, desktop review and officer knowledge.
    - **Stage 2:** A "First Site Sift", using the criteria in the SHELAA Methodology (ED006) to exclude sites with significant constraints, including significant Flood Zone 3 coverage.
    - **Stage 3:** A 'Decision Point Stage', to check whether enough sites had been identified based upon overall development need within the context of the emerging plan's spatial strategy.
    - **Stage 4 & 5:** Site Assessment and initial recommendations. A more detailed assessment of the remaining sites, considering a wider range of factors, including flood risk, informed by the Level 1 SFRA, consultation with the LLFA, and other evidence. The outcomes of these assessments are presented in Appendix 2 of ED029.
- **Level 2 Strategic Flood Risk Assessment (SFRA) (ED013):** Following comments received at the Regulation 19 stage from the Environment Agency and other bodies, for sites where the Level 1 SFRA identified potential flood risk issues, and which were still being considered for allocation after the broader site assessment process, a more detailed Level 2 assessment was undertaken by JBA Consulting (January 2025). This assessment provided site-specific evaluations of flood risk, going beyond the broad-brush zoning of the Level 1 SFRA. The Level 2 SFRA specifically:
    - Assessed flood risk from all sources, including fluvial, surface water, groundwater, sewers, and reservoirs, in line with NPPF requirements. [L2SFRA, Section 2, p.4]
    - Considered the impacts of climate change on flood risk, using the latest Environment Agency guidance and allowances. [L2SFRA, Section 5, p.64]
    - Provided detailed mapping of flood risk, including flood depth, velocity, and hazard where model data allowed. [L2SFRA, Appendix C]
    - Made site-specific recommendations for flood risk management, including:
        - Guidance on site layout and design to minimise flood risk.
        - Requirements for site-specific Flood Risk Assessments (FRAs).
        - Recommendations for Sustainable Drainage Systems (SuDS).
        - Considerations for safe access and egress.
        - Advice on emergency planning.

- Where relevant, considered if sites in high flood risk areas could meet the requirements of the Exception Test. [Section 7, L2SFRA].

The Level 2 SFRA provides the detailed, site-specific evidence to demonstrate that flood risk has been appropriately considered for those allocated sites with potential flood risk issues, in accordance with the NPPF and PPG. The detailed assessments are provided with Appendix B of the L2SFRA.

3.3 Local Plan Policy Approach to Flood Risk

The Local Plan's approach to flood risk is embedded within both its strategic policies and its specific development management policies. Policies PSD1, PSD2, PSD3, PSD4, and PSD5 establish the overall spatial strategy, inherently supporting a sequential approach by directing development towards existing settlements, prioritising previously developed land, and restricting development in the open countryside and Green Belt.

The core policies specifically addressing flood risk, and ensuring compliance with the NPPF are:

- **Policy SE3: Flood Risk Management (CD01, p.70):** This policy directly implements the sequential approach and the requirements of the NPPF and PPG at the development management level. Key provisions include:
    - Requirement for development to be located in areas with the lowest probability of flooding. This is a direct implementation of the Sequential Test. [CD01, Section 11, p.70, criterion 1]
    - Requirement to consider all sources of flooding. [CD01, Section 11, p.70, criterion 1]
    - Requirement for site-specific Flood Risk Assessments (FRAs) for developments in Flood Zones 2 and 3, and for sites over 1 hectare in Flood Zone 1, or where other sources of flood risk are identified, to ensure detailed assessment where needed. [CD01, Section 11, p.70, criterion 2]
        - FRAs are required to, “Assess all sources and forms of flooding in accordance with the SFRA guidance.”. [CD01, Section 11, p.70, criterion 3a]
        - Provide mitigation measures designed in line with the SFRA’s floodplain compensation and climate change modelling. [CD01, Section 11, p.70, criterion 3b]
        - Ensure no increase in flood risk on-site or elsewhere, including downstream/upstream receptors, existing development, and adjacent land. [CD01, Section 11, p.70, criterion 3c]
        - Demonstrate no increase in fluvial and surface water discharge rates or volumes during storm events up to and including the 1 in 100-year event (with an allowance for climate change). [CD01, Section 11, p.70, criterion 3d]
    - Include detailed modelling of any ordinary watercourses within or adjacent to the site, where appropriate, to define areas at risk and model the effect of climate change. [CD01, Section 11, p.70, criterion 3e]

- Provide an assessment of residual flood risk with appropriate mitigation strategies. [CD01, Section 11, p.70, criterion 3f]
- Collaborate with appropriate providers to assess sewer flood risk, particularly for proposals located in areas with a history of sewer flooding or near existing sewer infrastructure. [CD01, Section 11, p.70, criterion 3g]
- Consider the potential impacts of climate change on flood risk over the lifetime of the development, taking into account climate change allowances in the Strategic Flood Risk Assessment. [CD01, Section 11, p.70, criterion 3h]
- Development proposals in high-risk areas, as identified by the SFRA, may be subject to additional requirements, including: Minimum finished floor levels based on SFRA recommendations. [CD01, Section 11, p.70, criterion 4a]
- An 8-metre maintenance easement along main rivers. [CD01, Section 11, p.70, criterion 4b]
- Specific measures to promote river and watercourse naturalisation, in line with SFRA recommendations and guidance. [CD01, Section 11, p.70, criterion 4c]
- Where development is proposed in areas with potential groundwater flood risk, as identified by the Strategic Flood Risk Assessment or other sources, the Flood Risk Assessment should include a groundwater assessment. [CD01, Section 11, p.70, criterion 5]

- **Policy SE4: Sustainable Drainage Systems (CD01, p.72):** This policy reinforces the requirement for sustainable drainage and provides a clear hierarchy for surface water discharge. Key provisions include:
  - All development proposals should manage and discharge surface water through a sustainable drainage system. Smaller developments are encouraged to incorporate measures even if a full SuDS system isn't mandated. [CD01, Section 11, p.72, criterion 1]
  - Discharge Hierarchy: The policy establishes a clear order of preference for surface water discharge (Criterion 2):
    - Infiltration (into the ground)
    - Attenuated Discharge to a Surface Water Body
    - Attenuated Discharge to a Surface Water Sewer, Highway Drain, or another Drainage System
    - Attenuated Discharge to a Combined Sewer (only as a last resort)
  - SuDS drainage strategy should be submitted with the planning application. This strategy should: [CD01, Section 11, p.72, criterion 3]
  - Demonstrate a clear understanding of site-specific conditions including soil permeability, groundwater levels, and contamination risks (which may influence SuDS suitability).
  - Design SuDS solutions appropriate to the scale and nature of the development, following the surface water hierarchy and prioritising infiltration.

- Provide calculations for runoff rates, attenuation volumes, and demonstrate how the system will manage storm events up to and including the 1 in 100-year event with climate change allowances.
- Address the potential impacts of climate change on the long-term performance of SuDs and incorporate adaptation measures, where appropriate.
- Early engagement with the Lead Local Flood Authority (LLFA) and United Utilities is important to explore SuDS feasibility and design. For sites with potential canal discharge, the Canal and Rivers Trust should be consulted. [CD01, Section 11, p.72, criterion 4]
- SuDS proposals must align with the latest SFRA recommendations, LLFA guidance, and relevant SuDS design standards. [CD01, Section 11, p.72, criterion 5]
- A detailed maintenance plan for the approved SuDS system should be submitted, addressing ongoing responsibility, inspection regimes, and funding mechanisms for the SuDS lifespan. [CD01, Section 11, p.72, criterion 6]
- The maintenance plan should outline the long-term funding mechanism for the SuDS scheme. [CD01, Section 11, p.72, criterion 7]
- Pumped drainage systems should be minimised. Proposals should prioritise gravity-based, naturally functioning SuDS solutions wherever possible. [CD01, Section 11, p.72, criterion 8]

- **Policy SA1 General Requirements:** This policy makes reference to the need for a flood risk assessment / surface water drainage strategy using the outcomes of latest Strategic Flood Risk Assessment or latest Environment Agency mapping. It also requires consultation with the Environment Agency and lead local flood authority as appropriate and that mitigation measures should be delivered in accordance with the SFRA / Environment Agency guidance and Policy SE3.
- **Site-Specific Flood Risk Requirements within Allocation Policies (CD01, Section 13):** In addition to the borough-wide policies, the individual Site Allocation Policies (Section 13 of the Local Plan) reinforce the commitment to flood risk management by including specific requirements that reflect the findings of the Level 1 and Level 2 SFRAs. These requirements are tailored to the flood risks identified at each site. Examples of this tailored approach include:
    - **Policy AB12 (Land East of Diglake Street):** This policy requires a "sequential approach…within the site to direct development to areas at lowest risk of flooding, taking account of flood risk from all sources, including sewer and surface water flooding" (Criterion 10, p.111). It also requires that "All development [is] located an appropriate distance from the sewers and associated infrastructure adjacent to the western boundary of the site" (Criterion 11, p.111). This demonstrates consideration of multiple flood sources and the application of the sequential approach within the site boundary.
    - **Policy BL8 (Land adjacent to roundabout at West Avenue, Kidsgrove):** This policy also explicitly requires a "sequential approach…within the site to direct

development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding" (Criterion 3, p.140), demonstrating consistency in applying the sequential principle.

- **Policy TB19 (Land South of Newcastle Golf Club):** This policy is another good example of multiple requirements, including a "sequential approach within the site" (Criterion 6, p.149), a "noise assessment and mitigation strategy" (criterion 8, p.149), and “strategic open space to the south-west of the site adjacent to the M6 Motorway in accordance with an agreed masterplan, noise mitigation strategy and ecological mitigation strategy” (Criterion 9, p.149). This illustrates how flood risk (particularly surface water and motorway runoff) is integrated with other environmental and design considerations. The policy also notes the requirement to provide "a link road to facilitate a connection to the A525 Keele Road, working with Keele University and enhancement of existing Public Rights of Way and Green Infrastructure".
- **Policy KL15 (Land South of A525 Keele):** Policy KL15 requires a sequential approach, stating that this should be taken, “within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding, Appropriate ecological buffers to Flagstaff Plantation Ancient Woodland, Barkers Wood, Rosemary Hill Wood and Hands Wood (Biodiversity Alert Areas) and Springpool Wood (Site of Biological Importance)” (Criterion 9 and 10, p.121). It also requires, “The site should provide an active travel corridor to the east to provide for cycle connectivity into the town centre connecting into Paris Avenue / Gallowstree Lane”.

These examples, drawn from a range of sites across the Borough, demonstrate that the Local Plan's commitment to flood risk management is not limited to general policies, but is carried through to specific, deliverable requirements at the site allocation level. This ensures that flood risk is a central consideration in the implementation of the plan, not just its strategic direction.

4. Sequential Test Application

The Council considers that the Sequential Test has been robustly applied in the preparation of the Local Plan, in accordance with the NPPF and PPG. The application of the Sequential Test has been a fundamental part of the overall site selection process and has helped shaped the spatial strategy for the plan, as set out in policies PSD1, PSD2 and PSD3.

The Council fundamentally applied a sequential approach from the outset, in the following ways:

- **Defining the Search Area:** The area of search for potential development sites was primarily focused on the sustainable development locations defined in the spatial strategy (Policy PSD2). These locations – within the existing urban areas of Newcastle and Kidsgrove, and the defined Rural Service Centres – were identified as being generally at lower risk of flooding, particularly from fluvial sources, compared to undeveloped land in the open countryside or Green Belt. This strategic decision, informed by the Level 1 SFRA, represents the first, crucial step in applying the Sequential Test.
- **Prioritising Brownfield Land:** The spatial strategy, and the subsequent site selection process, prioritised the use of previously developed (brownfield) land within the defined

settlement boundaries. This further reflects the sequential approach, as brownfield sites are, by definition, in areas that have already been developed, and are generally less likely to be in areas of high flood risk (especially functional floodplain). This is demonstrated within policy PSD1.

- **Filtering within the SHELAA and Site Selection process:** The Strategic Housing and Economic Land Availability Assessment and site selectin process considered sites within the defined settlement hierarchy. This has helped to reduce the area of search for potential sites, excluding locations within the defined 'Rural Area', or those sites not well related to existing settlements, to help identify and discount those locations within flood zone 3.

The application of the Sequential Test at these earlier stages, has resulted in a Local Plan which directs the majority of new development to areas outside of flood zone 2 and 3.

By focusing development within these defined, more sustainable locations, the Council significantly reduced the need to consider sites in higher flood risk areas. This approach aligns with the NPPF's core principle of avoiding inappropriate development in areas at risk of flooding.

5. Exception Test Application

Where, following the application of the Sequential Test, it was not possible to allocate all required development in areas of lowest flood risk, the Exception Test, as set out in the NPPF, was applied.

The Level 2 SFRA provides the detailed, site-specific assessments necessary to inform the application of the Exception Test. Specifically, the Level 2 SFRA:

- Identified those allocated sites which, due to their location, required consideration under the Exception Test.
- Assessed the flood risk to each of those sites in detail, considering all sources of flooding and the impacts of climate change.
- Provided recommendations for site-specific mitigation measures to ensure that development would be safe for its lifetime and would not increase flood risk elsewhere.

The findings of the Level 2 SFRA, and the specific requirements included within the individual Site Allocation Policies (Section 13 of the Local Plan), demonstrate that the Exception Test has been appropriately considered, and that the allocated sites, even those with some flood risk, can be developed safely and sustainably.

A summary of the flood risk status and Exception Test requirements for each allocated site is provided in Appendix 1. This table draws directly from the detailed site assessments within the Level 2 SFRA.

6. Conclusion

The Newcastle-under-Lyme Local Plan has been prepared in accordance with the NPPF and PPG, demonstrating a robust, sequential, and risk-based approach to the location of development. Flood risk has been a central consideration throughout the plan-making process, informing:

- The overall spatial strategy, which prioritises development in sustainable locations generally at lower risk of flooding.
- The initial "sifting" of potential sites through the SHELAA methodology, which explicitly excluded sites predominantly within Flood Zone 3.
- The detailed assessment of sites through the Level 1 and Level 2 SFRAs, providing a comprehensive evidence base on flood risk.
- The inclusion of specific, robust policies (Policy SE3 and SE4) to manage flood risk and promote sustainable drainage.
- The incorporation of site-specific flood risk requirements within individual site allocation policies.
- The justification of the spatial strategy, well served by sustainable transport and maximising use of brownfield land.

The Council's approach to developing the spatial strategy and the selection of sites has had regard to the sequential approach and exception tests, as set out within national guidance. The council considers that the tests have been met through the plan making process.

The Council is confident that the Local Plan directs development away from areas of highest flood risk as far as is reasonably possible, and that where development is proposed in areas with some flood risk, it can be made safe and sustainable, without increasing flood risk elsewhere. The detailed evidence in the Level 1 and Level 2 SFRAs, and the specific requirements within the Local Plan policies, demonstrate this.

Appendix 1 – SFRA Level 2 Site Assessment Summary

NB. This table should be read alongside the Level 2 Strategic Flood Risk Assessment prepared by JBA Consultants.									
Local Plan Ref	Site Address	Site Area	Sequential Test Observations	Type of Development	Development Vulnerability	Exception Test Required	Flood Risk Category (SFRA Level 2)	Flood Risk contextual commentary	Does the development pass both parts of the exception test
AB2	Land adj. M6	80.94	There are no alternative available sites at lesser risk of flooding in the borough that could accommodate this development in a feasible and deliverable manner for the end user. Local Plan policies will ensure that in granting planning permission measures to address flood risk can be implemented. This will include ensuring that development is directed to those parts of the site at lowest risk of flooding. Compliance with Policy SE3 will ensure development does not result in increased flood risk elsewhere and, where possible, achieves reductions in flood risk overall. Mitigation measures as identified in the detailed FRA that will accompany any planning application submitted on this site will be incorporated into the final design. Based on this, the proposed allocation does pass the Sequential Test.	Employment	Less Vulnerable	No	Red Category	The site is affected by fluvial and surface water flooding, but the majority of the site is not shown to be at flood risk. The main area of risk is surrounding the more northern unnamed ordinary watercourse. Additionally, there is residual risk from the culverts to the east and west of the site and reservoir flooding in the Dry Day scenario.	Not applicable - Development is in an appropriate location under NPPF flood risk policy
AB33	Land off Nantwich Road / Park Lane	2.74	The site represents a sustainable location (having regard to evidence such as the Sustainability Appraisal) within a Rural Centre (the site abuts the existing settlement boundary) and would help meet the Audley specific housing figure (Policy PSD 3). The safety of development will be secured through mitigation measures identified through an FRA submitted with any planning application. Based on this, the proposed allocation does pass the Sequential Test.	Residential	More Vulnerable	N/A, site is in Flood Zone 1	Red Category	The site is affected by surface water flooding in all modelled surface water events. Although the risk is minimal and confined to the centre of the site in the 3.3% and 1% AEP events, flow paths from the southeast and western site extents emerge in the 0.1% and 1% AEP plus climate change events. The exception test is not required for this site because the entire site is located in fluvial Flood Zone 1. However, a site-specific FRA will be required, because the proposed development site is one hectare or greater in Flood Zone 1, subject to surface water flooding, and identified as being at increased flood risk in the future.	Not applicable - Development is in an appropriate location under NPPF flood risk policy
BL8	Land adj. to roundabout at West Avenue	1.42	The site represents a sustainable location (having regard to evidence such as the Sustainability Appraisal) within the Urban Centre which is the key strategic location within the Settlement Hierarchy (Policy PSD2). Future flood risk at this	Residential	More Vulnerable	N/A, site is in Flood Zone 1	Red Category	The site is at risk of surface water flooding, with surface water flood risk present in the western area across all events. Additionally, ponding emerges in the northeast of the site during the 1% and 0.1% AEP events, including the 1% AEP event plus 45% uplift for climate change.	Not applicable - Development is in an appropriate location under NPPF flood risk policy. The site now has planning permission.

			site can be managed through sequential approach to layout and flood resilient design. Based on this, the proposed allocation does pass the Sequential Test.						
BW1	Chatterley Valley	6.50	Located within the Strategic Centre of Newcastle under Lyme, the site's development would contribute to satisfying the employment land requirement for the Borough. Strategic road network proximity and adjacent comparable uses are further positive attributes. Future flood risk at this site can be managed through sequential approach to layout, with mitigation measures as identified in the detailed FRA that will accompany any planning application submitted on this site being incorporated. Based on this, the proposed allocation does pass the Sequential Test.	Employment	Less Vulnerable	No	Red Category	There is a pond with two existing drainage channels located within the site boundary. The site is affected by surface water flooding in all modelled surface water events, although the majority of the site is generally at low risk. Although the areas at risk are confined to the north-west, south-west and south-east site boundaries, the risk at the north-west of the site is classed as a 'Danger for All' in all events. There may also be a residual risk of surface water flooding in the southeast of the site as a result of blockages or obstruction in the culvert located to the south-east of the site. Areas of the site may also be at risk of flooding from groundwater.	Not applicable - Development is in an appropriate location under NPPF flood risk policy
CH13	Castletown Grange, Douglas Road	0.59	Residential development will allow for the existing housing offer to be rationalised and regenerated. This, allied to its brownfield status and forming part of an established predominantly residential wider area within the Strategic Centre serves to demonstrate the sustainability benefits of the development to the community outweigh the flood risk. The site has access to services and facilities. Future flood risk at this site can be managed through sequential approach to layout, with mitigation measures as identified in the detailed FRA that will accompany any planning application submitted on this site being incorporated. The detailed site requirements in the Local Plan as outlined in the note above, in SE3, SE4 and SA1 will support the delivery of the site. The site allocation passes the exception test in principle. Nevertheless, it will be necessary for developers to fully address the exception test at planning application stage.	Residential	More Vulnerable	Yes, should 'More Vulnerable' development be proposed within the extent of Flood Zone 3a.	Red Category	The southeast of the site is at risk from fluvial flooding, and is located within Flood Zones 2 and 3a, but not Flood Zone 3b. The southeast of the site is also at risk of surface water flooding, where a flow path encroaches the boundary from Douglas Road in all events. A new area of isolated surface water ponding also emerges in the west of the site in the 0.1% AEP event and in the 1% AEP plus 40% climate change events. Additionally, there are significant issues with access and escape routes in all modelled fluvial and surface water events.	Yes, development site can be considered for allocation

SP22	Former Playground off Ash Grove	0.70	Located within the Strategic Centre of Newcastle under Lyme, development of this brownfield site would facilitate redevelopment and a net increase in dwellings. Where feasible, future flood risk at this site could be managed through sequential approach to layout & flood resilient design. Based on this, the proposed allocation does pass the Sequential Test.	Residential	More Vulnerable	N/A, site is in Flood Zone 1	Red Category	The site is at significant risk of surface water flooding. Surface water flood risk is present in the eastern areas across all events. A prominent surface water flow path, which flows through the centre of the urban area of Silverdale, results in 51% of the site being at risk of surface water flooding during the 1% AEP event, and 60% being at risk in the 1% AEP plus 40% climate change.	Not applicable - Development is in an appropriate location under NPPF flood risk policy
TB19	Land south of Newcastle Golf Club	45.44	Located within the Strategic Centre of Newcastle under Lyme, with no sustainable and/or deliverable alternative residential sites available of the scale and yield proposed. Future flood risk at this site can be managed through sequential approach to layout, with mitigation measures as identified in the detailed FRA that will accompany any planning application submitted on this site being incorporated. Based on this, the proposed allocation does pass the Sequential Test.	Residential	More Vulnerable	N/A, site is in Flood Zone 1	Red Category	The site is generally shown to be at low risk. However, the site has some flood risk from two ordinary watercourses: Park Brook in the southwest of the site, and an unnamed watercourse along the north-eastern site boundary. Neither watercourse is large enough to be included within the EA FMfP, however, the EA RoFSW mapping shows the risk from the watercourses to be largely confined within either end of the site. The surface water risk to the site is shown to increase as a result of climate change. Surface water flooding may impede access and escape routes to the site during the 1% AEP plus 40% climate change event.	Not applicable - Development is in an appropriate location under NPPF flood risk policy
TC40	Blackfriars Road	0.20	Located within the Strategic Centre of Newcastle under Lyme and in close proximity to the Strategic Town Centre which contains a large range of services & facilities and access to sustainable transport connections. This, allied to its brownfield status and its current function as an underutilised surface car park serves to demonstrate the sustainability benefits of the development to the community outweigh the flood risk. Future flood risk at this site can be managed through sequential approach to layout, with mitigation measures as identified in the detailed FRA that will accompany any planning application submitted on this site being incorporated. The detailed site requirements in the Local Plan as outlined in the note above, in SE3, SE4 and SA1 will support the delivery of the site. The site allocation passes the exception test in principle.	Residential	More Vulnerable	Yes, should 'More Vulnerable' development be proposed within the extent of Flood Zone 3a.	Red Category	The site is adjacent to the Lyme Brook, located within 15m south of its channel. The southeast corner of the site is at risk of both fluvial and surface water flooding. However, only 1% or less of the site is at risk. The site is also potentially at significant risk of groundwater flooding. All fluvial flood risk events are classified as 'Danger for All', with depths nearing 2m or higher. However, due to the site's close proximity to the Lyme Brook, and the delineation of the modelling, it is likely the values observed are influenced by the channel. The southeast corner of the site experiences minimal surface water flooding in the 1% AEP event, with the risk extending marginally in the 0.1% AEP event and 1% AEP event plus 45% uplift for climate change.	Yes, development site can be considered for allocation

			Nevertheless, it will be necessary for developers to fully address the exception test at planning application stage.						
Site 11	Hardingswood Lane	0.82	The site is an existing travelling showperson site and the policy is for the intensification of use on the site. The Council has undertaken a detailed site selection process, including for Travelling Showperson use [ED019]. Future flood risk at this site can be managed through sequential approach to layout, with mitigation measures as identified in the detailed FRA that will accompany any planning application submitted on this site being incorporated. The detailed site requirements in the Local Plan as outlined in the note above, in SE3, SE4 and SA1 will support the delivery of the site. The policy wording for the site requires a drainage strategy to manage surface run off from the site. The allocation passes the exception test in principle. Nevertheless, it will be necessary for developers to fully address the exception test at planning application stage.	Gypsy and Traveller	Highly Vulnerable	Yes	Red Category	The site is shown to be affected by fluvial flooding however, the fluvial flood risk shown within the EA FMfP does not appear to be representative of the underlying topography. The site is also shown to at risk of surface water flooding in all modelled surface water events, with the exception of the 1% AEP plus 45% climate change surface water event. Although the risk is minimal and confined to the northern, western and southern site boundaries, there is considerable surface water risk to the roads surrounding the site and safe access and escape cannot currently be demonstrated for the 1% AEP, 0.1% AEP, and 1% AEP plus 45% climate change events.	Yes, development site can be considered for allocation
TB23	Land West of Galingale View	4.36	Located within the Strategic Centre of Newcastle under Lyme with the site's southern extent immediately adjacent to a Persimmon residential development (The Hamptons) which has now sold out (according to the developer website as at March 2025). Future flood risk at this site can be managed through sequential approach to layout, with mitigation measures as identified in the detailed FRA (potentially incorporating a detailed hydraulic model) that will accompany any planning application submitted on this site being incorporated. Based on this, the proposed allocation does pass the Sequential Test.	Residential	Highly Vulnerable	N/A, site is in Flood Zone 1	Red Category	The site is at flood risk from two unnamed ordinary watercourses which cross the site. Neither watercourse is included within the EA's Lyme Brook modelling or wider broadscale modelling, however, the EA's NafRA2 RoFSW mapping suggests that flood extents could extend up to 25m from the channel in the centre of the site. These watercourses cross the site and access, and escape routes need to be considered for each area of the site. The 1% AEP plus 40% climate change extent shows a similar extent to the 0.1% AEP extent on the site. Between the 1% AEP and 1% AEP plus 40% climate change events there is an increase in extent in the flow path along the northernmost watercourse which fully bisects the site in the climate change event. There is also an increase in extent in the flow path along the western site boundary and a new flow path forms along the path of the southern ordinary watercourse.	Not applicable - Development is in an appropriate location under NPPF flood risk policy