



**Bath & North East Somerset Representation Reference 106/5
Core Strategy Examination**

Respondent

Pro Planning

Issue 2:

**Spatial Strategy
Flood Risk
Q 3.6**

December 2011

ISSUE 2: Is the Spatial Strategy for the delivery of housing and jobs justified and are there reasonable prospects for delivery consistent with national advice?

Flood Risk (Strategic Sequential Test)

Paragraph 3.6 Should the Core Strategy include a contingency in case the more detailed work in the Placemaking Plan cannot satisfy the exception test?

1. This statement elaborates and updates representations made in January 2011 which primarily relate to Somer Valley. A more detailed response has been given under the heading of Issue 2 Sub Matter: Somer Valley, but it is relevant to consider the strategic aspect of the flood plain in Radstock Town Centre at this overarching stage.
2. The Core Strategy Policy SV.1 seeks to preclude new development, particularly housing development outside the Housing Development Boundary. An objection has been raised to this which is addressed under the appropriate heading. The majority of the “sites forming part of the identified future supply” however, lie in and around the town centre of Radstock, much of which is subject to flood risk. It does not seem that the sequential test has been rigorously applied during the assessment of sites for the purpose of presenting housing allocation numbers in the Core Strategy.
3. It is essential therefore if the Core Strategy is to be deemed sound, that:
 - first, the sequential test is applied with due rigour during the preparation of the Placemaking Plan, and,
 - secondly, the Core Strategy policy should incorporate sufficient flexibility. This is particularly in relation to the ability to consider other preferred sites not affected by the flood plain, and the flexibility to re-visit the Housing Development Boundary to ensure that PPS25 sequential test requirements are met before site specific commitments are entered into through the adoption of subsequent Development Plan Documents.