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Hastings Borough Council
Planning Policy
Hastings Borough Council Aquila House
Breeds Place
Hastings
TN34 3UY

Our ref: HA/2012/112879/GL-
01/NS1-L01
Your ref:
Date: 11 January 2013

Dear Peter

Hastings Local Plan Development Management Plan- Sequential Testing of Site Allocations December 2012

Thank you for your consultation on the above.

We find the sequential test has been clearly set out in the document produced by AECOM.

We agree with the methodology used to assess flood risk aspects which enable the test to be undertaken. There is also clear reference to the role of the Sustainability Appraisal in identifying the wider social and economic considerations in relation to the Exception Test as discussed at paragraph 102 in the National Planning Policy Framework (NPPF).

Appendix C of the document contains site profiles for those allocated sites which have a degree of flood risk associated with them. These profiles will be useful to guide developers in providing detailed site specific flood risk assessments.

We would however **recommend amendments** to the advice given for site FB2 - Former West St Leonards Primary School. This is the most sensitive site for flood risk. In the "additional information", it is recommended that "*If an opportunity arises the stream should be de-culverted*". We would not support de-culverting at this location. This is because the existing culvert is part of a flood defence scheme, which was completed in the 1970's to protect the area downstream from fluvial flooding. The culvert limits downstream flows and forces the floodwater to store upstream on the school playing fields. **We therefore recommend that the sentence is deleted.**

Please contact me if you have any questions on the above comments.

Yours faithfully

Mr Mark Luker
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