

**Winchester District Local Plan 2040** 

Flood Risk Sequential Exception Test Statement

**July 2024** 

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# 1. Background and National Policy

### 1.1 National Planning Policy Framework

1.2 National planning policy contained in the National Planning Policy Framework<sup>1</sup> (NPPF) advocates a sequential approach to flood risk, the aim of which is to steer new development to areas with the lowest probability of flooding. Section 14 addresses "Meeting the challenge of climate change, flooding and coastal change" with paragraphs 165 to 175 covering Planning and Flood Risk.

#### 1.3 Planning and flood risk

- **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.
- **166.** Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.
- **167.** All plans should apply a sequential, risk-based approach to the location of development taking into account all sources of flood risk and the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:
  - a) applying the sequential test and then, if necessary, the exception test as set out below:
  - b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
  - using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
  - d) d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.
- **168.** 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.

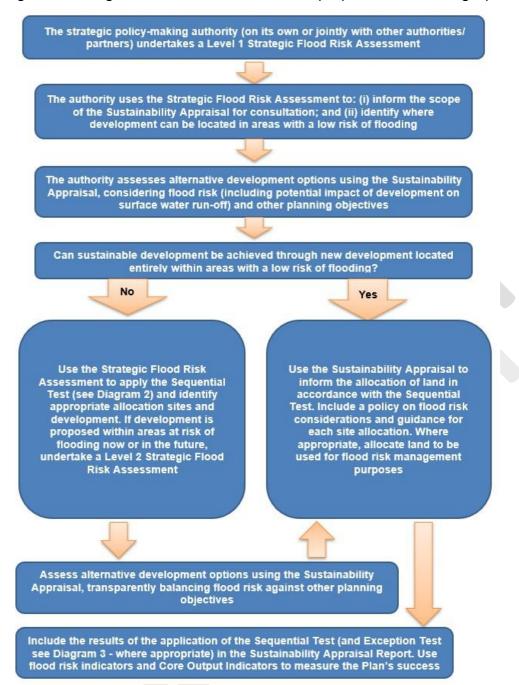
- **169.** If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.
- **170.** The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. 171. Both elements of the exception test should be satisfied for development to be allocated or permitted.
- **172.** Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.
- **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:
- 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
- d) safe access and escape routes are included where appropriate, as part of an agreed emergency plan. A site-specific flood risk assessment should be

provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

- **174.** Applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 59.
- **175.** Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
  - a) take account of advice from the lead local flood authority;
  - b) have appropriate proposed minimum operational standards;
  - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
  - d) where possible, provide multifunctional benefits

<sup>&</sup>lt;sup>1</sup> Ministry of Housing, Communities and Local Government. July 2021. *National Planning Policy Framework*. <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>

Figure 1 Taking flood risk into account in the preparation of strategic policies



Flood risk vulnerability classification (Source NPPF Annex 3)

#### **Essential Infrastructure**

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for
- operational reasons, including infrastructure for electricity supply including
- generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood.
- Wind turbines.
- Solar farms

#### Highly Vulnerable

- Police and ambulance stations; fire stations and command centres;
- telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a
  demonstrable need to locate such installations for bulk storage of materials
  with port or other similar facilities, or such installations with energy
  infrastructure or carbon capture and storage installations, that require
  coastal or water-side locations, or need to be located in other high flood risk
  areas, in these instances the facilities should be classified as 'Essential
  Infrastructure'.)

#### More Vulnerable

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking
- establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill\* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

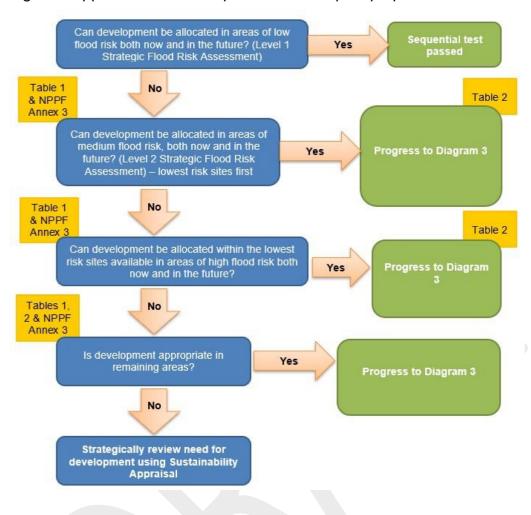
#### Less Vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill\* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.
- Car parks.

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- · Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan

<sup>&</sup>lt;sup>5</sup> Landfill is as defined in <u>Schedule 10 of the Environmental Permitting</u> (England and Wales) Regulations 2010.

Figure 2 Application of the Sequential Test for plan preparation



Start Here: Has the sequential test Do the sequential test been applied and shown that there are no reasonably available, lower No (see diagram 2) risk sites, suitable for the proposed Table 2 & development, to which the NPPF development could be steered.? Annex 3 Table 2 Yes No Can the development be made safe throughout its lifetime, without increasing flood risk elsewhere? Is the Exception test required? Yes Does the development pass both No parts of the exception test? Yes Development can be considered for allocation or permission. appropriate and should not be allocated or permitted. Yes

Figure 3 Application of the Exception Test to plan preparation

# Local Planning Policy Background in Winchester

- 1.4 Winchester City Council is preparing a new Local Plan. The Local Plan sets out how we intend to accommodate the growth we need to plan for in the district, outside the South Downs National Park, for the period up to 2040. This has involved the preparation of a number of evidence base documents to underpin the Local Plan. The council undertook a 6 week public consultation on the Strategic Issues & Priorities document between February and April 2021. This consultation document sought views on how the district should accommodate the homes that we need to plan for.
- 1.5 The SIP public consultation identified four possible 'spatial distribution' options to provide the level of housing that needed to be provided in the district. The approach in the SIP that received the most support was Approach 1: A development strategy based on the approach in the existing Local Plan of distributing development to a sustainable hierarchy of settlements but approach 2 and 4 were fairly well supported too. A hybrid option, based upon Approach 1 but with elements of Approach 2 and 4, was developed. This was subjected to initial testing through further consideration of the:
  - Settlement Hierarchy;
  - Availability of suitable, sustainable sites in each settlement; the presence of any "showstoppers" or constraints, for development;
  - Initial Sustainability Appraisal of sites in each settlement; and
  - Feedback from Parish and Town councils in terms of sites to meet the housing requirement that had been set by the City Council.
- 1.6 The development strategy was presented and discussed at LPAG, resulting in the regulation 18 draft Local Plan's proposed housing distribution as follows:

Winchester Town
South Hampshire Urban Areas
5,670 dwellings
5,700 dwellings

 Market Towns and Rural Area 4,250 dwellings (of which 500 to be delivered in the South Downs National Park Local Plan area)

- 1.7 The minimum housing requirement for the district is set by Government, based on a 'Standard Method' which is calculated taking account of expected future household growth and local housing affordability. These factors can change annually. The Regulation 19 Local Plan is currently based on the 'Standard Method' of 767 dwellings per year plus an 'unmet needs allowance' to help address the unmet housing needs of neighbouring areas.
- 1.8 Any site allocations that were in the adopted Local Plan that had not yet been developed were assessed to check whether they were still available and deliverable. If they were still available and deliverable they were carried forward as site allocations into the new Local Plan. These sites had already been found to be suitable and deliverable through the existing local plan process and the presumption was that they should be carried forward unless new issues had arisen that clearly demonstrated that they sites are not deliverable and the site should not be rolled forward into the new Plan. These sites were

- reappraised in the Integrated Impact Assessment to consider how they scored against a revised Sustainability Appraisal framework.
- 1.9 The starting point was any sites that were included in the 2021 Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA undertook an initial high-level assessment of the suitability, availability and achievability of sites promoted for development in the Plan area. This assessment identified whether sites were wholly or largely, or adjacent or partially, in flood risk zones 2 and 3. All of the SHELAA sites were assessed through the Sustainability Appraisal as part of the Integrated Impact Assessment and this helped to inform the shortlisting of sites for inclusion in the draft Regulation 18 Local Plan.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets
For all sites 14a: Environment Agency Flood Risk Zones	N/A	N/A	All other sites.	Significant proportion (>=25%) of site within Flood Zone 2	Significant proportion of site (>=25%) of site within Flood Zone 3a or 3b	Environment Agency Flood Risk Zones 2 and 3
For all sites 14b: Surface water flood risk areas	N/A	N/A	All other sites.	Significant proportion of site (>=25%) has a 1 in 100 year risk of surface water flooding	Significant proportion of site (>=25) has a 1 in 30 year risk of surface water flooding	Surface water flooding areas (Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding)

- 1.10 The Regulation 18 Local Plan that was published for public consultation at the end of 2022 included 'buffer' of about 1,450 dwellings the housing requirement which was provided to cater for potential future increases in the Standard Method and, in the spirit of cooperation required by government policy, to help contribute towards the PfSH housing shortfall.
- 1.11 The SHELAA was updated in 2023 <u>Strategic Housing and Economic Land Availability Assessment (SHELAA) Winchester City Council</u> and now includes a total of 396 SHELAA sites. It is important to note that the SHELAA is a high-level assessment that considers a site in terms of whether it is suitability, availability and achievability, including consideration of the flood zone in which the site is located. This high-level assessment of sites also indicates a site's potential housing capacity.
- 1.12 As part of the site allocations process, Officers assessed of all SHELAA sites against Flood Zones 2 and 3. Flood Zones 2 and 3 provide more precise data compared to surface water flooding. This information was based on the Environment Agency's Risk of Flooding from Surface Water and BGS's Susceptibility to Groundwater Flooding datasets. These are high-level datasets based on nationally produced models which provide an indication of the potential flood risk but cannot definitively show that an area of land is or is not at risk of flooding. Flood Zones are based on more detailed hydraulic models of watercourses (where available) and are updated regularly, therefore are able to provide an indication of flood risk to areas of land.

<sup>7</sup> https://Winchesterlocalplan.info/wp-content/uploads/sby-local-media/Evidence\_Base/Site\_Selection/SSL002-Draft-Local-Plan-Reg-19- Site-Allocations-Officer-Site-Assessments.pdf

### Assessing flood risk

- 1.13 Sites that had been included in the Regulation 18 Local Plan were assessed to determine the risk of flooding from all sources of flooding. In order to do this the analysis of sites used information included in the Environment Agency Flood Map for Planning (Rivers), Winchester City Council Strategic Flood Risk Assessment, and Hampshire County Council Local Flood Risk Management Strategy. The following criteria have been reviewed for each site:
  - Proportion in Flood Zone 2 and 3a, as shown on the Flood Map for Planning (Rivers).
  - Proportion within Flood Zone 3b.
  - Hazard ratings on the site and access route during the modelled 1% AEP flood event including an allowance for climate change (as reported in the Strategic Flood Risk Assessment).
  - Recorded Flood Outlines.
  - Number of internal and external property flooding records within 500m of the site.
  - Number of Historic Flood Incident records within 500m of the site.
  - Susceptibility of the site and its local area to groundwater flooding based on a review of the BGS Susceptibility to Groundwater Flooding mapping and historic records.

#### Flood Zone Definitions

1.14 The NPPF assesses the probability of flooding from rivers and the sea by categorising areas into Flood Zones of low, medium and high probability, as defined in Table 1 and presented on the Flood Map for Planning (Rivers).

#### 1.15 Report Structure

Section 2 of this document provides details of the datasets used to inform the Level 2 SFRA.

Section 3 provides an overview of the Level 2 SFRA for each of the sites. These are listed in groups, reflecting the increasing risk of flooding.

• Group 1: Sites in Flood Zone 1 with some dry access and low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records). [4 Sites]

- Group 2: Sites in Flood Zone 1 with limited dry access. Low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records). [8 Sites]
- Group 3: Sites in Flood Zone 1 with risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records). [19 Sites]
- Group 4: Sites within Flood Zones 2 and 3. [8 Sites]

Table 1 Flood Zones (PPG Table 1)

Flood Zone	Definition
Zone 1 Low	Land having a less than 0.1% annual probability of river or sea
Probability	flooding.
	(Shown as 'clear' on the Flood Map for Planning – all land
	outside Zones 2, 3a and 3b)
Zone 2	Land having between a 1% and 0.1% annual probability of
Medium	river flooding; or land having between a 0.5% and 0.1%
Probability	annual probability of sea
7 0 111 1	flooding. (Land shown in light blue on the Flood Map)
Zone 3a High	Land having a 1% or greater annual probability of river
Probability	flooding; or Land having a 0.5% or greater annual probability
	of sea. (Land shown in dark
Zone 3b The	blue on the Flood Map)  This zone comprises land where water from rivers or the sea
Functional	has to flow or be stored in times of flood. The identification of
Floodplain	functional floodplain should take account of local
1 loouplail1	circumstances and not be defined solely on rigid probability
	parameters. Functional floodplain will normally comprise:
	parameters: I another medapiant will membrase.
	<ul> <li>land having a 3.3% or greater annual probability of</li> </ul>
	flooding, with any existing flood risk management
	infrastructure operating effectively; or
	<ul> <li>land that is designed to flood (such as a flood attenuation</li> </ul>
	scheme), even if it would only flood in more extreme events
	(such as 0.1% annual probability of flooding).
	Local planning authorities should identify in their Strategic
	Flood Risk
	Assessments areas of functional floodplain and its boundaries
	accordingly, in agreement with the Environment Agency. (Not
	separately
	distinguished from Zone 3a on the
	Flood Map)

Note: The Flood Zones shown on the Environment Agency's Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

Table 2 Flood risk vulnerability and flood zone 'incompatibility' (PPG Table 2)

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

Key:

√ Exception test is not required

**X** Development should not be permitted *Notes:* 

- This table does not show the application of the <u>Sequential Test</u>
   which should be applied first to guide development to the lowest
   flood risk areas; nor does it reflect the need to avoid flood risk from
   sources other than rivers and the sea;
- The Sequential and <u>Exception Tests</u> do not need to be applied to those developments set out in <u>National Planning Policy Framework footnote</u> <u>56</u>. The Sequential and Exception Tests should be applied to 'major' and 'non major' development;
- Some developments may contain different elements of vulnerability and the highest vulnerability category should be used unless the development is considered in its component parts.

"†" In Flood Zone 3a essential infrastructure should be designed and constructed to remain

operational and safe in times of flood.

"\*" In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the

Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

## 2. Site sequential statement

- 2.1 The Environment Agency (EA) formally responded to the Regulation 18 Local Plan public consultation. In the representation the EA made specific comments in relation to some of the site allocations and specifically requested the Local Planning Authority prepared a 'site sequential statement'. In order to undertake this additional work, in consultation with the EA, AECOM were appointed to undertake a Stage 2 SFRA.
- 2.2 The purpose of the site sequential statement is to assess the sites that a Local Planning Authority is proposing to allocate against all sources of flooding and to steer development to the lowest flood risk.
- 2.3 It is important to reiterate that that there are nearly 400 sites in the 2023 SHELAA. The NPPF (paragraph 168) 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'. Many of these SHELAA sites are located away from any settlements and would therefore not be in accordance with the settlement hierarchy or not meet the development strategy that came directly from consulting on the SIP. As such, many SHELAA sites would not be 'appropriate for the proposed development' and, based on NPPF advice, need not be considered as part of the sequential test.
- 2.4 The Local Plan housing requirement is 13,656 dwellings 2020-2040. The 2023 SHELAA sites could, if they were all allocated for development, be capable of accommodating 49,183 potential homes. This is significantly higher than the number of homes that the City Council needs to allocate for in their Local Plan. In view of this, Winchester City Council in consultation with the EA and the taking into account the wording in the NPPF taken a proportionate approach to this site sequential statement for the following reasons:
- 2.5 **Resource Efficiency:** Conducting a sequential test is extremely resource-intense process as it involves providing a detailed analysis and technical evaluation of the sites against all sources of flooding. Assessing nearly 400 SHELAA sites would have required substantial time and financial resources when the vast majority of the SHELAA sites are not 'appropriate for the proposed development' as they are located away from services and facilities and do not meet the city council's development strategy that is based on feedback from the SIP public consultation.
- 2.6 **Housing Needs Alignment:** The number of homes that the city council are required to provide is significantly lower than that which is potentially provided from all SHELAA sites. Therefore, it was logical to concentrate on sites that best align with the development strategy as otherwise there would be a considerable amount of abortive work.
- 2.7 Constraints: Based on the development strategy, sites were selected for development based on constraints including preliminary flood risk considerations, the location of the site to services and facilities and feedback from the Parish and Town Councils who undertook their own public consultation on the suitability of sites for development.
- 2.8 **Focused on High-Priority sites:** Concentrating on the sites in the Reg 18 Local Plan allowed a thorough and detailed assessment of flooding from all sources to be

- undertaken along with any flood risk mitigation measures that would be required by the EA in a proportionate way.
- 2.9 In view of this, for the purposes of this site sequential statement, the site allocations that were included in the Regulation 18 Local Plan have been grouped into various categories. A summary of these tables is provided in Table 3 including the number of units that can be delivered within each group of sites. The sites are not always grouped by land type (i.e. greenfield or previously developed land), however this is included within the tables for reference.

Table 3 Summary of sequential assessment of sites and number of units

Description of the risk of flooding from all sources	Total number of units
Group 1: Sites in Flood Zone 1 with some dry access and low risk from other	180
sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records). [4 Sites]	
Group 2: Sites in Flood Zone 1 with limited dry access. Low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records). [8 Sites]	683
Group 3: Sites in Flood Zone 1 with risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records). [19Sites]	3,140
Group 4: Sites within Flood Zones 2 and 3. [8 Sites]	1,775
Total <sup>1</sup>	5,778

Table 4 All sources of WCC housing provision

Sources of housing provision	Reg 19 Plan
Completions	3,170
Existing planning consents	6,780
Existing Local Plan allocations	745
Windfall allowance	1,895
New Local Plan allocations	2,875
Standard Method requirement	13,565
Unmet Need Allowance ('Buffer')	1,900
Total supply	15,465

<sup>&</sup>lt;sup>1</sup> It is important to note that the number of units in this table also includes some sites that have planning permission and are currently under development and some sites which have been carried forward from the previous Local Plan. For example, the units included in the above table will be spread across Existing Planning Consents, Existing Local Plan Allocations and New Local Plan Allocations.

2024

Group 1 Sites in Flood Zone 1 with some dry access and very low/low risk from other sources of flooding

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	% of Site Within 30 year RoFS W	% of Site within 100 year RoFSW	% of Site within 1000 year RoFSW	BGS Susceptibility	% of Site withi n Flood Zone 1	% of Site withi n Flood Zone 2	% of Site withi n Flood Zone 3a	% of Site withi n Flood Zone 3b	Recorded flood Outline within 500m
		N441 11 1							Limited potential for groundwater flooding					
SH3	2.9	Whiteley Green	Residential		30	0.0	0.0	0.5	to occur	100	0.0	0.0	0.0	N/A
BW4	5.3	Land North of Rareridge Lane	Residential	2032	100	0.0	0.0	0.0	Limited potential for groundwater flooding to occur	100	0.0	0.0	0.0	Winter 13/14 East Hampshire Aerial Photography
CC4	0.8	Land adjoining 85 Church Lane		2031		0.0	0.0	0.0	N/A	100	0.0	0.0	0.0	N/A
SW01	1.8	Land at West Hill Road North	Residential		40	0.0	0.0	1.9	Limited potential for groundwater flooding to occur	100	0.0	0.0	0.0	Winter1995_Riv er Dever_Aerial(30 )

Group 2: Sites in Flood Zone 1 with limited dry access. Low risk from other sources of flooding

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	% of Site within 30 year RoFS W	% of Site withi n 100 year RoFS W	% of Site with in 100 year RoF SW	BGS Susceptibility	% of Site withi n Floo d Zone 1	% of Site withi n Floo d Zone 2	% of Site withi n Floo d Zone 3a	% of Site wit hin Flo od Zon e 3b	Recorded flood Outline within 500m
WC1	2.8	Morgan's Yard	Residential		80	0.8	1.0	3.3	N/A	100	0.0	0.0	0.0	N/A
CC1	2.7	Clayfield Park	Residential		48	1.3	2.6	6.3	Potential for groundwater flooding of property situated below ground level	100	0.0	0.0	0.0	N/A
BW1	7.3	The Vineyard/T angie Lane	Residential		120	0.0	0.0	0.0	Limited potential for groundwater flooding to occur	100	0.0	0.0	0.0	N/A
H16	1.6	The Nurseries Shedfield	Traveller and Gypsy			0.2	0.2	2.3	Limited potential for groundwater flooding to occur	100	0.0	0.0	0.0	Winter 2000/01g_T urkey Island_Shed field
KW1	1.3	Cornerway s and Merrydale	Residential	2029/	30	0.0	0.0	1.6	Limited potential for groundwater flooding to occur	100	0.0	0.0	0.0	Winter 2000/01gw_ Nunswalk St_Kings Worthy Winter 13/14 East Hampshire

Winchester	City	Counci	ı
willchester	CILV	Counci	ı

Flood Risk Sequential and Exception Test Statement

														Aerial
														Photograph
														У
														Winter
														2000/01gw_
														Nunswalk
														St_Headbou
														rne
														Worthy(1)
		Colden Common		2032/										
CC2	2.3	Farm	Residential	33	45	3.0	3.2	5.0	N/A	100	0.0	0.0	0.0	N/A
														·
									Potential for					
									groundwater flooding of					
									property situated below					
									ground level					
						`			Limited potential for					
									groundwater flooding to					
NA2	30.8	Sun Lane	Residential		320	0.6	1.0	2.0	occur	100	0.0	0.0	0.0	N/A
														06/11/2000
														_River
				· ·										Meon_Aeria
									)					l(100)
														06/11/2000
														_River
														Meon_Aeria
														l(114)
														06/11/2000
														_River
														Meon_Wick
														ham(2)
														06/11/2000
		Land at Junction of							Limited potential for					_River
		Mill Lane		Post					groundwater flooding to					Meon_Wick
WK6	2.4	(Wickham)	Residential	2030	40	0.0	0.0	0.6	occur	100	0.0	0.0	0.0	ham(9)

# Group 3: Sites in Flood Zone 1 with risk from other sources of flooding

Winchester City Council

Site ID	Are a (H A)	Full Address	Land Type	Local Plan Year	Uni ts	% of Site withi n 30 year RoFS W	% of Site withi n 100 year RoFS W	% of Site withi n 1000 year RoFS W	BGS Susceptibility	% of Site wit hin Flo od Zon e 1	% of Site wit hin Flo od Zon e 2	% of Site wit hin Flo od Zon e 3a	% of Site wit hin Flo od Zon e 3b	Recorded flood Outline within 500m
									Potential for groundwater					
									flooding to occur at					
									surface					
									Potential for groundwater flooding of property					
									situated below ground					Winchester Leisure
									level					Centre, Winter 13/14
									Limited potential for					Winter
		Station		2030					groundwater flooding to					2000/01gw_River
W8	5.8	Approach	Residential	/31	250	0.3	3.2	10.9	occur	100	0.0	0.0	0.0	Itchen_Winchester(1)
									Potential for groundwater					
									flooding to occur at					
									surface					
									Potential for groundwater flooding of property					
									situated below ground					
									level					
									Limited potential for					
	43.	Bushfield	Employmen						groundwater flooding to					
W5	0	Camp	t			0.0	0.1	0.3	occur	100	0.0	0.0	0.0	N/A
									Potential for groundwater					The Globe, New
									flooding to occur at					Alresford, Winter
NA1	2.1	The Dean	Residential		130	0.0	0.3	3.3	surface	100	0.0	0.0	0.0	13/14

2024

Winchester	City	Council

_	_	_	_	
7	n	า	1	
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N/A
06/11/2000_River
Meon_Aerial(100)
06/11/2000_River
Meon_Wickham(9)
Bridge Street,
Wickham, Winter
13/14
Winter
2000/01gw_Nunswal
k St_Headbourne
Worthy(2)
Winter 13/14 East
Hampshire Aerial
Photography
Winter2000/01gw_W
inchester(Barton
Farm)(1)
Headbourne Worthy,
Winchester, Winter
13/14
Winter
2000/01gw_Nunswal
k St_Littleton(2)
N/A

									<del></del>					
									surface					
									Potential for groundwater					
									flooding of property					
									situated below ground					
									level					
									Limited potential for					
									groundwater flooding to					
									occur					
									Potential for groundwater					
									flooding of property					
									situated below ground					
									level					
									Potential for groundwater					
		Tynefield	Traveller						flooding of property					
H18	1.5	Whiteley	and Gypsy			8.0	1.3	2.2	situated at surface	100	0.0	0.0	0.0	N/A
		1							Potential for					
		Land at Main		2031					groundwater flooding to					
CC3	1.4	Road	Residential	/32	35	0.0	0.6	0.8	occur at surface	100	0.0	0.0	0.0	N/A
									Potential for groundwater					
									flooding to occur at					
						1			surface					
									Potential for groundwater					
									flooding of property					
									situated below ground					
		Land adjoining							level					
		the Cart							Limited potential for					Winter
		and	Older	2029	· ·				groundwater flooding to					2000/01gw_Nunswal
1014/2	4.7	Horses				0.3	1.2	7.2		100	0.0	0.0	0.0	_
KW2	4.7	PH	persons	/30		0.3	1.2	7.3	occur	100	0.0	0.0	0.0	k St_Kings Worthy
									Detential for an automate at a					M:+2000/04
									Potential for groundwater					Winter2000/01gw_W
				1					flooding of property					inchester(Barton
									situated below ground					Farm)(1)
									level					Winter 13/14 East
		Courtena		2032					Limited potential for					Hampshire Aerial
W4	6.0	y Road	Residential	/33	150	0.0	0.0	0.0	groundwater flooding to	100	0.0	0.0	0.0	Photography

	1	,			1			1				1	1	T
									occur					
									Potential for groundwater					
									flooding to occur at					
									surface					
									Potential for groundwater					
									flooding of property					
									situated below ground					
									level					
									Limited potential for					
	17			2024					·					0C/11/2000 Bives
	17.	Ravensw	Bartharital				0.5		groundwater flooding to	100	0.0	0.0	0.0	06/11/2000_River
WK4	2	ood	Residential	/25	200	0.2	0.5	1.7	occur	100	0.0	0.0	0.0	Meon_Aerial(42)
									Potential for					
		Bar End		2025					groundwater flooding to					
W9	1.2	Depot	Residential	/26	30	0.0	0.0	0.6	occur at surface	100	0.0	0.0	0.0	N/A
									Potential for groundwater					
									flooding of property					
									situated below ground					
									level					
		Universit	Student						Limited potential for					
	19.	y and hospital	Accommod	2035					groundwater flooding to					
W11	6	area	ation	/36	210	0.8	2.8	8.4	occur	100	0.0	0.0	0.0	N/A
														Winter
														2000/01gw_River
														Itchen_Winchester(1)
									Potential for groundwater					Winter 13/14 East
									flooding to occur at					Hampshire Aerial
									surface					Photography
									Potential for groundwater					Water Lane,
									flooding of property					Winchester, Winter
									situated below ground					13/14]
				1					level					Park Avenue,
									Limited potential for					Winchester, Winter
	43.		Employmen						groundwater flooding to					13/14
W6	5	Winnall	t			1.0	2.6	8.4	occur	100	0.0	0.0	0.0	Winter
VVU		vviilliall	·	1	1	μ.υ	2.0	0.4	Occui	±00	5.0	0.0	0.0	VVIIICCI

														2000/01gw_River
														Winchester Leisure
														Centre, Winter 13/14
														Itchen_Winchester(2)
														Egypt Cottage,
		Land at							Potential for groundwater					STOCKBRIDGE ROAD
	5.3	Brighland		Post					flooding to occur at					EAST, Sutton Scotney,
SU01		S	Residential	2023	60	0.0	0.3	3.2	surface	100	0.0	0.0	0.0	SO21 3LD
									Limited potential for					
									groundwater flooding to					
		Land at							occur					
		Southwic							Potential for groundwater					Wykeham
	3.4	k Road/Sch		Post					flooding to occur at					Field, Wickham PO17
WK5		ool Road	Residential	2030	60	0.0	0.1	1.4	surface	100	0.0	0.0	0.0	5AB
									Potential for groundwater					
									flooding to occur at					
									surface					
									Potential for groundwater					06/11/2000_River
									flooding of property					Meon_Wickham(1)
									situated below ground					Bridge Street,
									level					Wickham, Winter
									Limited potential for					13/14
		The		Com					groundwater flooding to					06/11/2000_River
WK2	6.0	Glebe	Residential	plete	80	2.5	3.9	10.5	occur	100	0.0	0.0	0.0	Meon_Aerial(114)
									Potential for					
	11.	Albany		comp					groundwater flooding to					
BW2	8	Farm	Residential	lete	120	0.0	0.0	1.6	occur at surface	100	0.0	0.0	0.0	N/A

### Group 4: Sites within Flood Zones 2 and 3

These are sites within Flood Zones 2 and 3. More Vulnerable and Highly Vulnerable development may be permitted within Flood Zone 2; proposals for Highly Vulnerable development would be subject to the satisfaction of the Exception Test. More Vulnerable development may be permitted in Flood Zone 3a, subject to the satisfaction of the Exception Test. Development is not permitted in Flood Zone 3b. Site proformas are included in Appendix A.

Potential for groundwater flooding to occur at surface Potential for groundwater flooding of property situated below ground level	ite ID a (HA)	Address	Land Type	Local Plan Year	Unit s	% of Site within 30 year RoFS W	% of Site within 100 year RoFS W	% of Site within 1000 year RoFS W	BGS Susceptibilit Y	% of Site withi n Flood Zone 1	% of Site withi n Flood Zone 2	% of Site withi n Flood Zone 3a	% of Site withi n Flood Zone 3b	Recorded flood Outline within 500m
Potential for groundwater flooding to occur at surface Potential for groundwater flooding of property situated below ground level	W1 10.0	The Lakes	Residential		100	4.7	8.4	17.7	N/A	85	2.9	12.3	0.0	N/A
Waterlooville potential for groundwater	114 245 0	(including			250				groundwater flooding to occur at surface Potential for groundwater flooding of property situated below ground level Limited potential for groundwater		0.5			N/A

Winchester City Council	Flood Risk Sequential and Exception Test Statement	2024

	1	1	1					1	1	1	Т	1	
								occur					
OT01	Land East of Main Road		2032/3 3	55	0.0	0.3	1.0	Potential for groundwater flooding to occur at surface	99.99	0.01	0.0	0.0	Winter 13/14 East Hampshire Aerial Photography
W3	St Peter's Car Park	Residential	2030/3 1	30	0.0	0.0	1.3	Potential for groundwater flooding to occur at surface	85	15.1	0.0	0.0	Park Avenue, Winchester, Winter 13/14] Winchester Leisure Centre, Winter 13/14 Water Lane, Winchester, Winter 13/14 Winter 2000/01gw_River Itchen_Winchester(4)
	North							Potential for groundwater flooding to occur at surface Potential for groundwater flooding of property situated below ground level Limited potential for groundwater flooding to					
SH2		Residential		200	2.7	4.3	11.2	occur	93	1.1	5.5	0.0	N/A

Winchester	City	Council	ı
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Flood Risk Sequential and Exception Test Statement

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									Potential for					
									groundwater					
									flooding to					
									_					
									occur at					
									surface					
									Potential for					
									groundwater					
									flooding of					
									property					Winter
									situated below					2000/01gw_Nunswal
									ground level					k St_Littleton(1)
									Limited					Fyfield Way, Littleton,
									potential for					Winter 13/14
		Sir John							groundwater					Winter1995_Nuns
		Moore		2030/3					flooding to					Walk
W2		Barracks	Residential	1	900	0.7	2.6	9.8	occur	97	0.3	2.9	0.0	Stream_Harestock
														Park Avenue,
														Winchester, Winter
														13/14
									Potential for					, Winchester Leisure
									groundwater					Centre, Winter 13/14
									flooding to					Winter
			Employmen						occur at					2000/01gw_River
W10	1.6	River Park	t			0.0	0.2	11.8	surface	51	31.3	8.9	8.6	Itchen_Winchester(1)
**10	1.0	raver rank				0.0	0.2	11.0	Jarrace	51	51.5	0.5	0.0	Winter
														2000/01gw_River
														Itchen_Winchester(2)
								1						Water Lane,
														-
														Winchester, Winter
														13/14
									Potential for					Park Avenue,
		Central							groundwater					Winchester, Winter
		Winchester							flooding to					13/14
		Regeneratio		2026/2					occur at					Winchester Leisure
W7	4.6	n	Residential	7	240	3.9	7.8	21.3	surface	55	39.6	4.2	1.2	Centre, Winter 13/14

# Group 5 Sites that require the exception test, scored against the SA objectives

LP Site	SHELAA Site Ref	Parish	Address	Proposed Use	SA1	SA2	SA4	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
OT01	OT03	Otterbourne	Land off Main Road, Otterbourne	Residential use	-	-	+	-	0?	1	0?	0?		1	0
SH1	SH2c	Newlands	West of Waterlooville Newlands	Mixed use	-	-	+	-	0?	1	0?	0?	0	-	0
SH2	SH3c	Curdridge	North Whiteley	Mixed use	•	-	0	•	0?	ı	0?	0?		0	0
SW1	SW1c	Swanmore	The Lakes	Residential use	1	-	-	1	0?	1	0?	0?	0	0	0
W2	LH05	Littleton and Harestock	Sir John Moore Barracks, Winchester	Residential use	-	-	0	-	0?	1	0?	0?		0	0
W3	WIN22	Winchester Town	St Peters Car Park, Gordon Road	Residential use	+	++	+	++	0?	I	0?	-?	0	0	-
W7	CWR/WIN7c	Winchester Town	Central Winchester Regeneration	Mixed use	+	+	-	+	0?	1	0?	?	0	0	
W10	WIN23	Winchester Town	River Park Leisure Centre	Mixed use	+	+	0	+	0?	-	0?	0?	-	0	

# Integrated Impact Assessment – assessment categorisations and symbols

Symbol and Colour Coding	Description	Symbol and Colour Coding	Description
++	Significant positive effect likely	++/-	Mixed significant effects likely
++/-	Mixed significant positive and minor negative effects likely	-	Minor negative effect likely
+	Minor positive effect likely	/+	Mixed significant negative and minor positive effects likely
+/-	Mixed minor effects likely		Significant negative effect likely
++/-	Mixed significant effects likely	0	Negligible effect likely

# 3. Exception test

- 3.1 The purpose of the Exception Test is to ensure that, where it may be necessary to locate development in areas at risk of flooding, new development in Flood Zone 2 and Flood Zone 3 is only permitted if it can be demonstrated that:
  - a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
  - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 3.2 Both elements of the Exception Test should be satisfied for development to be allocated or permitted.
- 3.3 Figure 1 identifies when the Exception Test is required. It is noted that some types of development are not permitted, regardless of the application of the Exception Test.
- 3.4 Full details of the vulnerability classifications for different types of development can be found in Annex 3 of the NPPF.
- 3.5 Where development is proposed in areas at risk of flooding the Exception Test is required, as determined by PPG Diagram 2: Application of the Sequential test for plan preparation.
- 3.6 The SFRA Level 2 that was undertaken by AECOM has identified that of the 39 sites, 31 of the sites did not require the exception test. For the remaining sites, a site-specific FRA will be required to satisfy part 2 of the Exception Test. For these sites it will be necessary for the developer to demonstrate that the proposed development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. This applies to the following sites:
  - OT1 Land East of Main Road (Otterbourne)
  - SH1 West of Waterlooville (Waterlooville)
  - SH2 North Whiteley
  - SW1 The Lakes (Swanmore)
  - W2 Sir John Moore Barracks (Winchester)
  - W3 St Peter's Car Park (Winchester)
  - W7 Central Winchester Regeneration (Winchester)
  - W10 River Park (Winchester)
- 3.7 In order for these 8 sites to pass Part 2 of the Exception Test, WCC has worked closely with the EA and HCC, in their capacity as the Lead Flood Authority (LLFA) to ensure criteria is included in the policy which ensure that the site will be safe for its lifetime and does not increase flood risk elsewhere and where

possible reduces flood risk.

### Part 1: Wider sustainability benefits

a. The Planning Practice Guidance on Flood Risk and Costal Change<sup>10</sup> provides further information:

How can it be demonstrated that wider sustainability benefits to the community outweigh flood risk?

Local planning authorities need to set their own criteria for this assessment, having regard to the objectives of their Plan's Sustainability Appraisal framework, and provide advice which will enable applicants to provide relevant and proportionate evidence.

Examples of wider sustainability benefits to the community could include:

- The re-use of suitable brownfield land as part of a local regeneration scheme;
- An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure;
- The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding National Planning Policy Framework policy requirements for Sustainable Drainage Systems;

Identified sustainability benefits need to be balanced against any associated flood risks, informed by the site-specific flood risk assessment. The impacts of flood risk on social, economic and environmental factors should be considered. Where wider sustainability benefits are absent or where they are outweighed by flood risk, the Exception Test has not been satisfied and the site allocation in the plan should not be made or planning permission should be refused.

The Local Plan SA Framework comprises 14 SA Objectives that have been derived from the policy context, baseline data and key sustainability issues and opportunities:

- Objective 1: To minimise the District's contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2031
- Objective 2: To reduce the need to travel by private vehicle in the District and improve air quality
- Objective 3: To support the District's adaptation to unavoidable climate change
- Objective 4: To improve public health and wellbeing and reduce health inequalities in the District
- Objective 5: To support community cohesion and safety in the District
- Objective 6: To provide housing of a decent standard to meet needs in the District
- Objective 7: To ensure essential services and facilities and jobs in the District are accessible
- Objective 8: To support the sustainable growth of the District's economy
- Objective 9: To support the District's biodiversity and geodiversity

- Objective 10: To conserve and enhance the character and distinctiveness of the District's landscapes.
- Objective 11: To conserve and enhance the District's historic environment including its setting.
- Objective 12: To support the efficient use of the District's resources, including land and minerals
- Objective 13: To protect the quality and quantity of the District's water resource
- Objective 14: To manage and reduce flood risk from all sources
- 3.8 Sites that have been allocated for development in the Local Plan that meet the requirements of Part 1 of the Exceptions Test in the PPG as they are located in sustainable settlements which have services and facilities and they are located on bus routes therefore meeting a number of Objectives in the IIA. In accordance with the PPG, there are a number of other sites that have been allocated for development in the Local Plan that offer much wider sustainability benefits as they are located on previously developed land and are part of wider regeneration plans (e.g. Central Winchester Regeneration, SJM Moore Barracks etc). It is important to note that there are other site allocations such as Newlands (West of Waterlooville), Whiteley and The Lakes in Swanmore)) that have already been granted Outline Planning permission. The sites that have Outline Planning permission have detailed flood risk assessments and include appropriate mitigation measures (e.g. SuDS) and they avoid area at risk of flooding. The remaining site in the Regulation 19 Local Plan at Otterbourne (OT1) is only proposed for partial built development so it is possible as part of the design process to avoid areas at risk of flooding and to include appropriate mitigation measures.

### Part 2: Safe Development without increasing flood risk elsewhere

- 3.9 The Level 2 SFRA provides site proformas for each of the 37 sites. The proformas summarise the flood risk from all sources to each site based on available datasets and provides requirements for site layout and development design to enable safe development that will not increase flood risk elsewhere.
- 3.10 For all sites where development is proposed in the area, development should seek to restrict surface water runoff rates to greenfield rates; demonstrate sustainable approaches to the management of surface water making use of SuDS; and incorporate soft landscaping, planting, and permeable surfacing.
- 3.11 A preliminary Hydrogeological Risk Assessment (HRA) should be undertaken to determine ground conditions and groundwater levels in proximity to the site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage. The potential impact of climate change will be included within this assessment. Should the preliminary HRA identify potential for impact, a full HRA should be prepared to identify proposed mitigation measures.
- 3.12 The 3 sites identified below have a proportion of their area within the 3.33% AEP (1 in 30 year) modelled flood extent.
  - SH1: Newlands (West of Waterlooville) (site already has planning permission)

- W7: Central Winchester Regeneration, Winchester
- W10: Former River Park Leisure Centre, Winchester
- 3.13 Within undeveloped areas of the 3.3% AEP flood extent, development should not be permitted, rather land should be safeguarded for flood storage. Redevelopment of existing buildings within the 3.3% AEP extent may be permitted, but only where the vulnerability of the development is not increased (and where possible reduced) and the number of occupants does not increase. For W7 and W10 this may limit the number of units that can be delivered on these sites.
- 3.14 The following sites are located partially within the design flood extent (1% AEP (1 in 100 year) including climate change).
  - SH1: Newlands (West of Waterlooville) (site already has O/L planning permission)
  - W7: Central Winchester Regeneration (Winchester)
  - W10: Former River Park Leisure Centre (Winchester)
- 3.15 For these sites, if development is proposed within the design flood extent, level-for-level and volume-for-volume floodplain compensation storage within the development sites is required for any increase in building footprint. This may limit the number of units that can be delivered on the sites.
- 3.16 Modelling is not available for all sites, and therefore site-specific modelling will be required for any new development on the following sites to confirm the flood risk during the design event (1% AEP event including climate change).
  - SH2: North Whiteley (site already has O/L planning permission)
  - SU01: Land at Brightlands
  - SW1: The Lakes, (Swanmore) site already has O/L planning permission)
  - W2: Sir John Moore Barracks (Winchester) new site allocated for development.
- 3.17 With regards to fluvial flooding there are several sites where safe access is considered to be limited. Further consultation with Emergency Planners and the Environment Agency is required to discuss the safety of occupants, and not place an unacceptable additional burden on the emergency services:
  - SW1: The Lakes (site already has planning permission) (Swanmore)
  - W3: St Peter's Car Park (Winchester)
  - W7: Central Winchester Regeneration (Winchester)
  - W10: Former River Park Leisure Centre (Winchester)
- There are several sites where safe access may not be achievable and could therefore restrict development. In these cases additional supporting text has been included in the Regulation 19 Local Plan that early consultation should take place with HCC, in their role as LLFA, to explore opportunities for development to contribute to a reduction in flood risk. Consultation should also be undertaken with Emergency Planners to discuss the safety of occupants, and not place an unacceptable additional burden on the emergency services.
  - BW3: Tollgate Sawmill (Bishop's Waltham)
  - SH1: Newlands (West of Waterlooville)

- SH4: Solent Business Park (Whiteley)
- KW1: Cornerways and Merrydale (Kings Worthy)
- NA1: The Dean (New Alresford)
- W7: Central Winchester Regeneration (Winchester)
- W10: Former River Park Leisure Centre (Winchester)
- WK1: Winchester Road (Wickham)
- WK2: The Glebe (Wickham) complete
- WK5: Land at Southwick Road/School Road (Wickham)
- 3.19 There are also sites where access routes are susceptible to low risk of surface water flooding. Further consultation with Emergency Planners and HCC, in their role as LLFA, is required to discuss the safety of occupants, and not place an unacceptable additional burden on the emergency services.
  - BW1: The Vineyard/ Tangier Lane (Bishop's Waltham)
  - BW2: Albany Farm (Bishop's Waltham) complete
  - CC1: Clayfield Park (Colden Common)
  - CC2: Colden Common Farm (Colden Common)
  - CC3: Land at Main Road (Colden Common)
  - H16: The Nurseries Shedfield (Shedfield)
  - H18: Tynefield Whiteley (Whiteley)
  - W1: Barton Farm (Winchester)
  - W3: St Peter's Car Park (Winchester)
  - W4: Courtenay Road (Winchester)
  - W8: Station Approach (Winchester)
  - W9: Bar End Depot (Winchester)
  - W11: University and Hospital area (Winchester)
  - WK6: Land at junction of Mill lane (Wickham)

### 4 Summary

#### Sequential Test

- 4.10 This Report documents the application of the sequential assessment that has been undertaken by Winchester City Council.
- 4.11 The sequential test has been undertaken in a proportional way to meet the requirements of the NPPF and PPG to ensure that resources were utilised efficiently, and that our housing needs were met through a focused and prioritised approach. This method supports sustainable development and effective flood risk management, aligning with both immediate and long-term planning objectives.
- 4.12 All the sites in Table 1 to 3 are considered to pass the Sequential Test.
  - 4.13 This provides a total capacity of 5,778 against the requirement of 13, 565 dwellings. See Table 4 for **All sources of WCC housing provision**

Table 4 for All sources of WCC housing provision

Sources of housing provision	Reg 19 Plan
Completions	3,170
Existing planning consents	6,780
Existing Local Plan allocations	745
Windfall allowance	1,895
New Local Plan allocations	2,875
Standard Method requirement	13,565
Unmet Need Allowance ('Buffer')	1,900
Total supply	15,465

## 5 Exception Test

- 5.10 Where development is proposed in areas at risk of flooding the Exception Test is required (PPG Table 2).
- 5.11 Winchester City Council has applied the Exception Test to the 8 sites identified by the Stage 2 SFRA which required further evaluation.
- 5.12 With respect to Part 1) of the Exception Test, as indicated in paragraph 3.8 of this report there are wider sustainability objectives which are considered to outweigh the flood risk:
  - OTO1: Land off Main Road (Colden Common)
  - SH1: Newlands (West of Waterlooville)
  - SH2: North Whiteley
  - SW1: The Lakes (Swanmore)
  - W2: Sir John Moore Barracks (Winchester)
  - W3: St Peter's Car Park (Winchester)
  - W7: Central Winchester Regeneration (Winchester)
  - W10: Former River Park Leisure Centre (Winchester)
- 5.13 In order to ensure that that the risk of flooding is mitigated it is essential that the above site allocations include a requirements for the developer to undertake a site-specific Flood Risk Assessment to satisfy part 2 of the Exception Test (i.e., the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall).
- 5.14 It has been agreed with the EA and HCC as the Local Flood Authority that in the Regulation 19 the following site allocations should include additional supporting text and site specific criteria:

# 5.15 Table 5 Flood specific policy criteria /supporting text to be included in the sites which require the exception test

Site reference	Actions for WCC to include within Policy	Specific policy criteria /supporting text
OT01	<ul> <li>Site specific FRA will be required</li> <li>Site needs to be safe for its lifetime</li> <li>Link Local Plan back to the SFRA</li> </ul>	Supporting text The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment. A site-specific Flood Risk Assessment will demonstrate how flood risk will be managed over the lifetime of the development.
		New criteria A site-specific Flood Risk Assessment will need to be prepared and agreed that

		demonstrates how development will be safe over its lifetime, taking climate change and the vulnerability of the developments users into account, and ensure that flood risk is not increased elsewhere as a result of the development.
SH1	<ul> <li>Site specific FRA will be required</li> <li>Site needs to be safe for its lifetime</li> <li>Sequential approach should be adopted on site</li> <li>Site specific modelling would be required to refine flood extents to include latest climate change allowances if development proposed near to River Wallington flood extents</li> <li>Access and egress need to be considered</li> <li>Link Local Plan back to the SFRA</li> </ul>	Supporting text The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment. A site-specific Flood Risk Assessment will demonstrate how development will be safe over the lifetime. Access and egress will need to be considered and should be addressed in consultation with the emergency planners.  New criteria A site-specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe over its lifetime, taking climate change and the vulnerability of the developments users into account, and ensure that flood risk is not increased elsewhere as a result of the development.
SH2	<ul> <li>Site specific FRA will be required</li> <li>Site needs to be safe for its lifetime</li> <li>Sequential approach should be adopted on site</li> <li>Site specific FRA needs to consider new climate change allowances at reserved matters stage</li> <li>Link Local Plan back to the SFRA</li> </ul>	Supporting text The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment. A site-specific Flood Risk Assessment will demonstrate how flood risk will be safe over the lifetime of the development.  New criteria A site-specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe over its lifetime taking climate change and the vulnerability of the developments users into account,

		and ensure that flood risk is not
		increased elsewhere as a result of
		the development.
	Site specific FRA will be	Supporting text
	required	The development of this site needs
		to refer to the Winchester District
		Stage 2 Strategic Flood Risk
	lifetime	Assessment. A site-specific Flood
	Sequential approach should be	Risk Assessment will demonstrate
	adopted on site	the development will be safe over
	Access and egress need to be	·
	considered including	its lifetime. access and egress will need to be considered and should
	consultation with Hampshire	be addressed in consultation with
	County Council as LLFA and	
	Emergency planners	the emergency planners.
SW1	<ul> <li>Link Local Plan back to the</li> </ul>	Now evitorio
	SFRA	New criteria
		A site-specific Flood Risk Assessment will need to be
		prepared and agreed that demonstrates how the
		development will be safe over its
		lifetime taking climate change and
		the vulnerability of the
		developments users into account,
		and ensure that flood risk is not
		increased elsewhere as a result of
		the development.
	Site specific FRA will be	Supporting text
	required	The development of this site needs
	Site needs to be safe for its	to refer to the Winchester District
	lifetime	Stage 2 Strategic Flood Risk
	Sequential approach should be	Assessment. A site-specific Flood
	adopted on site	Risk Assessment will demonstrate
	Site specific modelling is	how Development will be safe over
	required to refine flood extents	the lifetime of the development.
	to include latest climate change	Access and egress will need to be
	Route of winterbourne stream	considered and should in
	across site must be identified	consultation with the emergency
W2	and protected from	planners. A winterbourne tributary
***	development	of the Nuns Walk Stream crosses
	Development should be set	the site. As part of the design
	back from the watercourse and	process further investigation
	no development should be	(through topographic surveys and
	within 8m of the watercourse	flood modelling) is needed to
	Watercourse should not be	determine the exact route of the
	culverted as part of any	winterbourne across the site. It is
	development	vital that this flood flow route is
	Link Local Plan back to the	protected in the redevelopment, as
	SFRA	it carries floodwater away from
		Littleton when groundwater levels
		are high.

### New criteria

A site-specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe for its lifetime taking climate change and the vulnerability of the developments users into account, and ensure that flood risk is not increased elsewhere as a result of the development. As part of the design process, further investigation (through topographic surveys and flood modelling) determines the exact route of the winterbourne which crosses the site which should be managed and protected as it carries floodwater away from Littleton when groundwater levels are high.

- Site specific FRA will be required
- Site needs to be safe for its lifetime
- Sequential approach should be adopted on site
- Development should be set back from the watercourse and no development should be within 8m of the watercourse
- De-culvert watercourse where possible
- Compensatory storage may be required if developing within floodplain
- Access and egress need to be considered including consultation with Hampshire County Council as LLFA and Emergency planners
- Link Local Plan back to the SFRA

### Supporting text

The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment. A site-specific Flood Risk Assessment will demonstrate how the development will be safe for its lifetime. Any access and egress matters should be addressed in consultation with the emergency planners.

As part of the design process, development should be set back from the watercourse and no development should be within 8m of the watercourse. As part of the design process opportunities should explore the de-culverting of watercourse. And deliver BNG.

Compensatory storage may be required if developing within floodplain.

#### New criteria

A site-specific Flood Risk Assessment will need to be prepared and agreed that

W3

demonstrates how the development will be safe for its lifetime taking climate change and the vulnerability of the developments users into account and ensure that flood risk is not increased elsewhere as a result of the development.

As part of the design process, opportunities should explore the de-culverting of watercourse. Compensatory storage may be required if developing within floodplain.

- Site specific FRA will be required
- Site needs to be safe for its lifetime
- Sequential approach should be adopted on site
- Development should be set back from the watercourse and no development should be within 8m of the watercourse
- Compensatory storage may be required if developing within floodplain
- Deculvert watercourse
- Access and egress need to be considered including consultation with Hampshire County Council as LLFA and Emergency planners
- Link Local Plan back to the SFRA

#### Supporting text

The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment. A site-specific Flood Risk Assessment will how the development will be safe for its lifetime access and egress will need to be considered and should be addressed in consultation with the emergency planners.

Due to flooding, development should be set back from the watercourse and no development should be within 8m of the watercourse. Compensatory storage may be required if developing within floodplain.

As part of the design process, opportunities should be explored to decolvert the watercourse and deliver BNG.

#### New criteria

A site-specific Flood Risk
Assessment will need to be
prepared and agreed that
demonstrates how the
development will be safe for its
lifetime taking climate change and
the vulnerability of the
developments users into account,
and ensure that flood risk is not
increased elsewhere as a result of

W7

		the development.
		Due to flooding, development should be set back from the watercourse and no development should be within 8m of the watercourse. Compensatory storage may be required if developing within floodplain.
		As part of the design process, opportunities should be explored to deculvert the watercourse and deliver BNG
W10	<ul> <li>Site specific FRA will be required</li> <li>Site needs to be safe for its lifetime</li> <li>Sequential approach should be adopted on site</li> <li>No development is permitted within Flood Zone 3b, areas of Flood Zone 3b should be retained as floodplain</li> <li>Access and egress need to be considered including consultation with EA, Hampshire County Council as LLFA and Emergency planners</li> <li>Link Local Plan back to the SFRA</li> </ul>	Supporting text The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment. A site-specific Flood Risk Assessment will how the development will be safe for its lifetime access and egress will need to be considered and should in consultation with the emergency planners.  New criteria A site-specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe for its lifetime taking climate change and the vulnerability of the developments users into account and ensure that flood risk is not increased elsewhere as a result of the development.