

BUILDING

A BETTER FUTURE

Strategic Flood Risk Assessment (Local Plan Sites)

February 2025



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1. Introduction

- 1.1 This document sets out the approach that Havant Borough Council has taken to site selection for allocations in its Local Plan to 2043, in the light of flood risk. It forms a Strategic Flood Risk Assessment (SFRA) of the potential Local Plan sites, before decisions were reached as to whether they should be included in the plan. It has been prepared to inform the Sustainability Appraisal of the draft 'Building a Better Future' Local Plan, published for consultation in the spring of 2025.

Local Plans and Flood Risk

- 1.2 The National Planning Policy Framework (NPPF)¹ and associated Planning Practice Guidance on Flood Risk and Coastal Change (PPG)² emphasise the active role Local Planning Authorities should take in ensuring that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process.
- 1.3 The overall approach of the NPPF to flood risk in local plans is set out in paragraphs 170-172.

Figure 1
Paragraphs 170-172 of the National Planning Policy Framework

Planning and flood risk

170. 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.

171. 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.

172. 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;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

¹ National Planning Policy Framework (2024) www.gov.uk/guidance/national-planning-policy-framework--2

² National Planning Policy Guidance on Flood Risk (2022) www.gov.uk/guidance/flood-risk-and-coastal-change

c) 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) 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

Source: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.4 Local Plans should apply a sequential, risk-based approach to the location of development. In order to apply this principle, information on all sources of flood risk in the present day and in the future is required.
- 1.5 An SFRA is a study which assesses:
- The risk from all sources³ of flooding
 - The cumulative impact that development or changing land use would have on the risk of flooding; and
 - The effect of climate change on risk.
- 1.6 The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA). Information in the SFRA should be used to apply the sequential approach to site selection and identify appropriate allocation sites and development. The aim is to steer development the lowest risk areas.
- 1.7 This report sets out the approach that Havant Borough Council has taken to site selection for allocations in its Local Plan to 2043, in the light of flood risk.

Strategic Flood Risk Information

The PfSH SFRA (2024)⁴

- 1.8 A Level 1 Strategic Flood Risk Assessment was commissioned by the Partnership for South Hampshire (PfSH) and prepared by AECOM. The SFRA was prepared in line with the requirements of the National Planning Policy Framework, supporting Planning Practice Guidance and Environment Agency guidance 'How to prepare a Strategic Flood Risk Assessment'⁵, and was published in 2024.
- 1.9 The SFRA takes the form of a written report for the whole PfSH area, supplemented by a report for each individual Local Authority area. These reports are accompanied by extensive mapping outputs, showing different types of flood risk. The outputs from the PfSH SFRA, together with nationally available mapping have substantially informed this sites level SFRA.

³ Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources. Flood risk also accounts for the interactions between these different sources

⁴ [PfSH Strategic Flood Risk Assessment \(2024\) | Havant Borough Council](#)

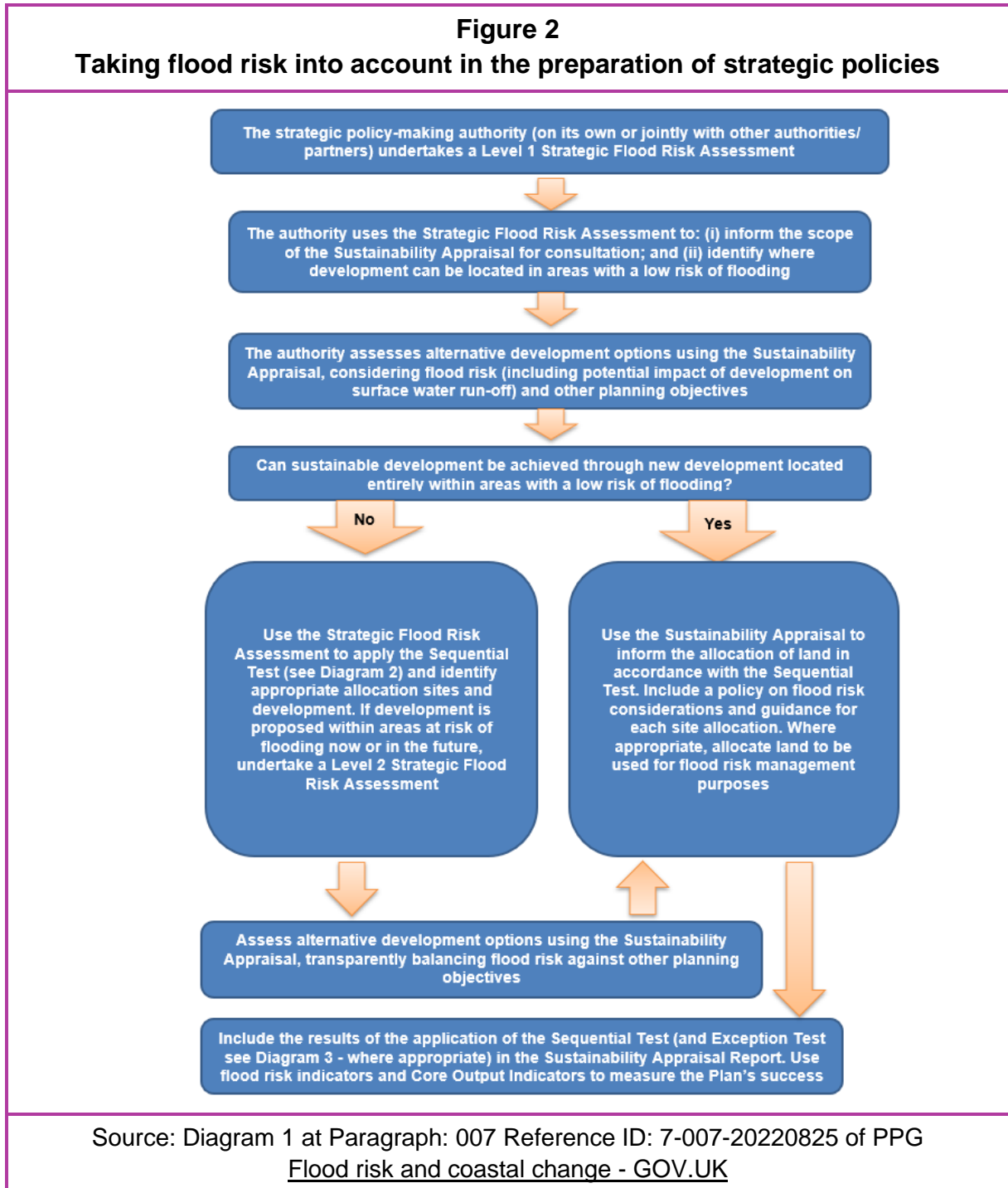
⁵ Environment Agency Guidance (2024): [How to prepare a strategic flood risk assessment - GOV.UK](#)

New national flood risk assessment 2025 (NaFRA2)

- 1.10 The Council is aware that national data and mapping (NaFRA2) is scheduled for publication in March 2025. This will include updated Flood Zones, information on future tidal and fluvial flood risk, as well as surface water risk. This data will potentially differ from the information in the PfSH SFRA discussed above.
- 1.11 When NaFRA 2 is published, it will represent the most up to date information on flood risk available. The Council acknowledges that this will necessitate a review of the information presented in this document. This review will take place between the consultation on the draft (Regulation 18) Local Plan in the spring of 2025, and the publication of the Pre-Submission (Regulation 19) Local Plan, so that any implications for the Local Plan strategy and for individual site allocations in the plan may be reflected.

2. Local Plan Site Assessment

2.1 Figure 2 below shows how national guidance suggests flood risk should be taken into account in the preparation of Local Plans.



2.2 Before concluding which development strategy to pursue and what sites to allocate for development through the Local Plan, flood risk on all potential sites was considered in detail. Site screening to assemble data for each site, and Sustainability Appraisal to apply that information and consider alternative strategies and site allocations formed the main vehicles for this process. The process is described in greater detailed below.

Stage A: The SHELAA - Identifying developable sites

- 2.3 Through the preparation of the Local Plan, the Council prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA), to identify the full range of developable sites in the borough. This involved reviewing all potential sites: those identified by the council as well as those submitted by landowners and developers. In line with national guidance, to be considered developable, sites had to be suitable, available and achievable.
- 2.4 A site or a broad location was considered 'suitable' if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Flood risk represents one such constraint. Therefore, high level site screening for flood risk took place to inform the SHELAA.
- 2.5 Sites entirely or almost entirely within Flood Zones 2 or 3 now or in the future were discounted at this stage as unsuitable for development, representing the first step in avoiding flood risk and taking forward sequentially preferable sites.

Stage B: Detailed Review of Flood Risk

Site Screening

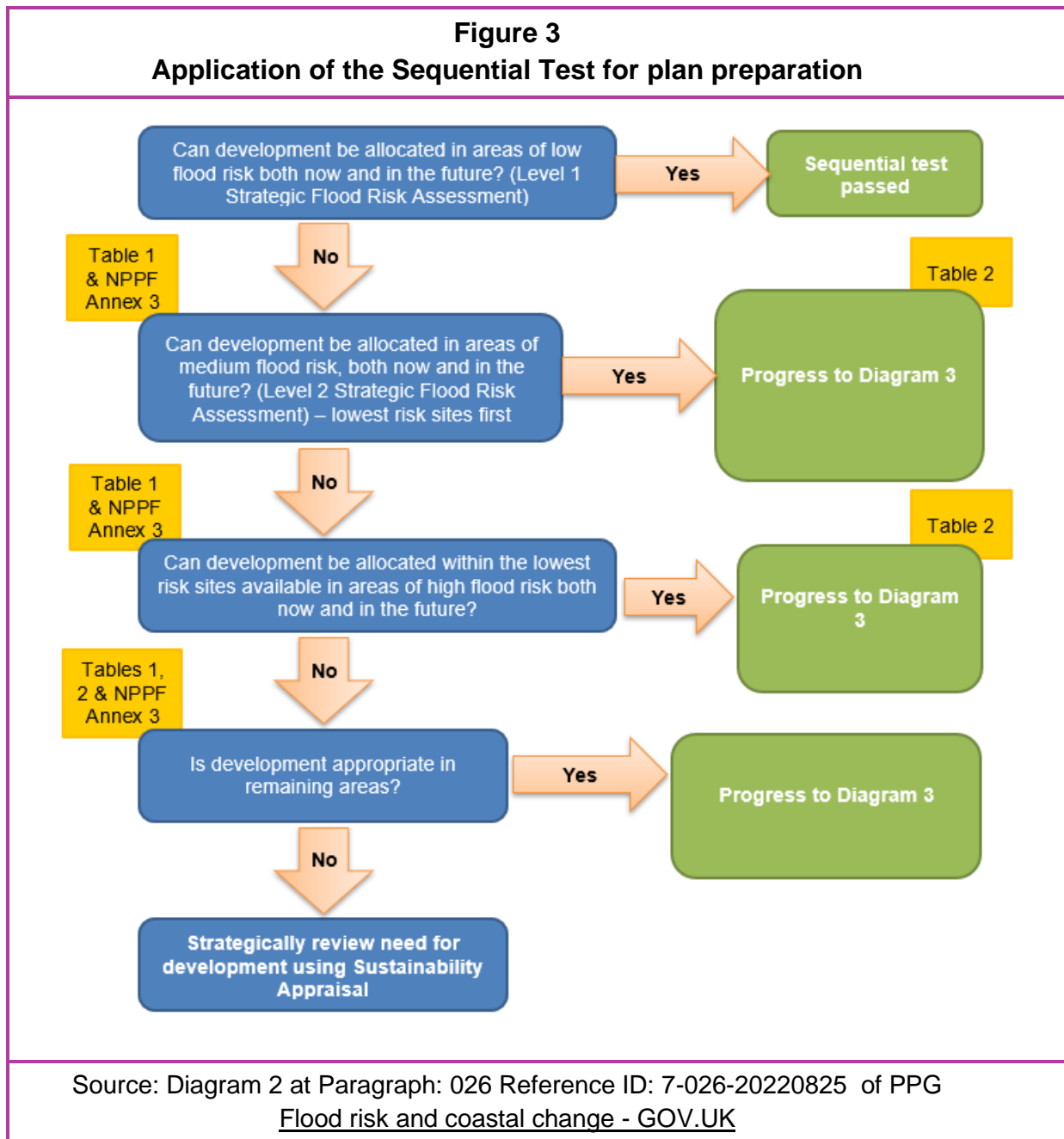
- 2.6 The output of the SHELAA was a list of developable sites. After exclusion of sites noted to be entirely or almost entirely at risk of tidal and fluvial flooding as described above, the developable SHELAA sites included sites in Flood Zone 1 now and in the future, and sites partially in Flood Zones 2 and 3 now or in the future.
- 2.7 Inclusion in the SHELAA does not indicate that a site should be allocated in a Local Plan, nor that it is suitable for allocation. Further scrutiny of the constraints and opportunities at every site is needed before this conclusion is reached. Sites were therefore put through a process of detailed site screening and further scrutiny on a variety of topics. In terms of flood risk, this involved more detailed interrogation of the data provided by the PfSH SFRA and national mapping for all sources of risk.

Note on consideration of all types of flood risk

- 2.8 It is fully acknowledged that all sources of flooding should be considered together in identifying the level of risk at a site. In undertaking the site review and site selection process all types of flood risk were taken into consideration in parallel. They are presented in this report split into two parts: first tidal & fluvial risk and then other sources of flooding. This is for two reasons:
- 2.9 Firstly, given the amount of data to be assimilated, it was considered that the presentational split would result in a more readable and easy to follow report. Secondly, and more influentially, the review of the flood risk information showed that data available for ground water was too high level to be a useful measure for site selection. The review also showed that the vast majority of the sites were affected in some form by surface water or drainage risk, with just three having no indicators that this risk might apply (see more detailed discussion under paragraphs 2.29 onwards below below). It was therefore determined that in Havant, groundwater and surface water flood risk do not form a useful measure to distinguish between sites in terms of taking a sequential approach to site selection at the plan making level. The

sequential test for the plan (see Figure 3 and paragraph 2.11 onwards below) was therefore undertaken based on tidal and fluvial risk, with other sources of risk considered separately.

2.10 A summary of the risk from the combined sources for each site was then brought back together for use in the Sustainability Appraisal (see Stage C below).



Fluvial and Tidal Risk

Sequential Approach – Identifying Low Risk Sites

2.11 The purpose of the sequential approach to flood risk in planning is to ensure that areas at no or little risk of flooding are developed in preference to areas at higher risk. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features.

- 2.12 In line with the flood risk management hierarchy of 'Avoid – Control – Mitigate - Manage, the starting point for the Havant Local Plan was therefore to assume that only those sites where flood risk could be avoided entirely should be taken forward to allocation. This is in line with national guidance on applying the sequential test in selecting sites for the Local Plan (see Figure 2 above): low risk sites should be considered first, before considering development on medium or high risk sites (NB medium and high risk sites are together referred to in the remainder of this report at 'higher risk sites').
- 2.13 On this basis, the first part of the sites review was to identify those sites entirely in Flood Zone 1 now or in the future, and where no issues with the wider area or access routes. These sites were identified as low risk and are listed at Appendix 1 as 'Group 1a' sites.
- 2.14 As well as the sites wholly in Flood Zone 1, more detailed interrogation of the flood risk information allowed the identification of an additional tranche of low risk sites, where flood risk was considered likely to be avoidable at site level, because only negligible parts of the site are affected. Again, for these sites, no issues with the wider area or access routes were noted. These are listed as 'Group 1b' sites in Appendix 1.
- 2.15 Together, Groups 1a and Group 1b sites represent around 70% of the sites considered potentially suitable for allocation without further consideration through the SFRA. This might appear to be a relatively high percentage of assessed sites in a borough with notable tidal risk in particular. However, readers are reminded that, as described at Stage A above, sites where there was significant risk of tidal or fluvial flooding on site were discounted as unsuitable through the SHELAA and were not assessed through this SFRA.
- 2.16 Before discussing the next step of site review further it should be noted that three sites on Hayling Island might have been identified as being 'low risk', being themselves wholly or largely in FZ1 now and in the future. However, the assessment also took into account the fact that the single access road onto the island is at risk in the present day, with the area at risk, and the predicted depth and hazard increasing notably in the future with climate change (see mapping at Appendix B of the PfSH SFRA⁶). This makes voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. On this basis, the Council determined that no site on Hayling Island can be considered to be low risk in light of tidal flooding, and included these sites in the list of higher risk sites for further review.

Sequential Approach – Review of Higher Risk Sites

- 2.17 The Council acknowledges its duty to seek to meet development needs, and therefore considered it to be unreasonable to avoid flood risk altogether by relying solely on the 'Group 1a' and 'Group 1b' low risk sites. It therefore went on to consider the remaining, higher risk, sites in greater detail, in order to determine whether allocation would be appropriate, despite the potential tidal and fluvial flood risk.
- 2.18 The table of 'Group B' sites at Appendix A shows the a commentary on the tidal and fluvial flood risk on each site.

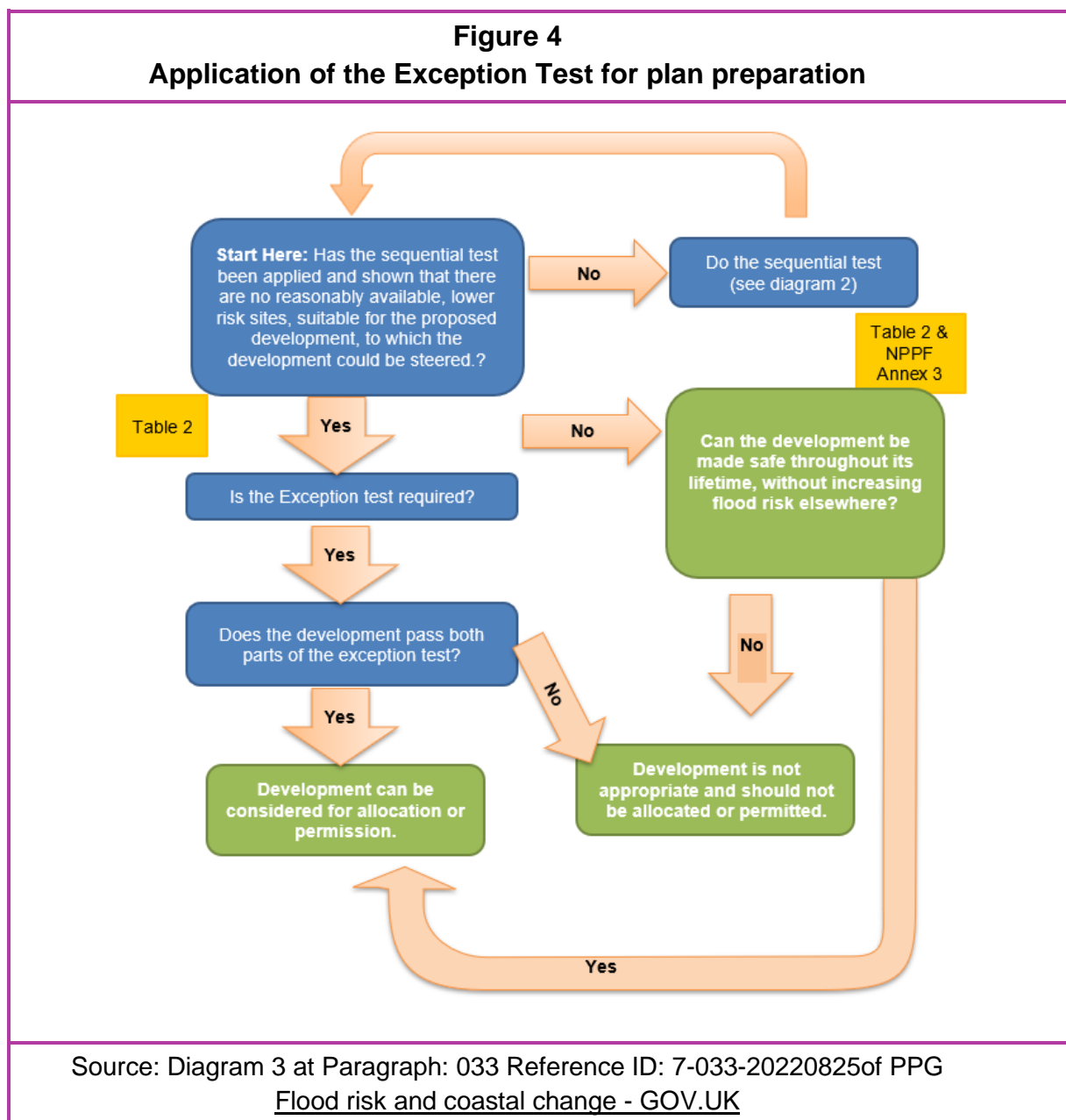
⁶ [PfSH Strategic Flood Risk Assessment \(2024\) | Havant Borough Council](#)

The Exception Test

2.19 While the extent of the risk to these sites varies, as they are all considered to be higher risk, all were considered against the exception test. The final column in the table of Group B sites sets out this commentary.

2.20 In order for a site to be considered acceptable for development in the light of flood risk, the exception test requires that:

- 1) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and that
- 2) 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.



2.21 In line with the NPPF and the PPG (see Figure 4 above), both elements of the exception test had to be shown to be satisfied for development to be considered suitable for allocation in the plan.

Other Sources of Risk

2.22 As noted previously, all sources of flooding should be considered as part of SFRA. Groundwater and Surface Water / Drainage flooding are the most common forms aside from tidal and fluvial risk discussed above.

Groundwater Risk

2.23 The PfSH SFRA includes a discussion and two map set outputs on Groundwater flood risk (SFRA Appendix A, Figures 4 and 5⁷). However, it warns that these map sets focus on geological and hydrological conditions only and do not show the likelihood or the risk of groundwater flooding in an area. On this basis, the mapping was not used in the assessment of sites for the Local Plan.

2.24 For a discussion of the risk from groundwater in the borough and to view the relevant map sets, readers are referred directly to the PfSH SFRA.

Surface Water Risk

2.25 The PfSH SFRA includes mapping data showing Risk of Flooding from Surface Water (RoFSW)⁸. This is based on Environment Agency modelling of those areas at risk of surface water flooding during three annual probability events:

- High Probability 1 in 30 year (3.33% annual probability),
- Medium Probability 1 in 100 year (1% annual probability) and
- Low Probability 1 in 1,000 year (0.1% annual probability).

2.26 The RoFSW mapping does not include specific scenarios to determine the impact of climate change on the risk of surface water flooding. However, the SFRA indicates that it is possible to use with caution the 0.1% outline as a substitute dataset to provide an indication of the implications of climate change on surface water flood risk in the future. Since current and future risk are relevant in assessing risk at a site, the 1 in 1000 year mapping was used for Local Plan the site assessment to indicate potential risk of surface water flooding at a site.

2.27 In addition, Hampshire County Council as Lead Local Flood Authority (LLFA) has produced Catchment Management Plans (CMPs)⁹. In Havant, the relevant CMPs are those for the Lavant and the Wallington & Meon catchment areas. The CMPs highlight particular areas that have an increased risk of flooding, when compared to the rest of the catchment. In Havant Borough these are in Havant West, Havant East, Emsworth, South Hayling and Waterlooville. The Catchment Management Plan was used to identify those which fall within a CMP Priority Area.

2.28 The Risk of Flooding from Surface Water and the Drainage Priority areas were used to identify whether potential allocation sites was at surface water risk. It was also recorded whether a

⁷ SFRA 2024 Map at Appendix A [Figure 4 - Area Susceptible to Groundwater Flooding \(EA\)](#); [Figure 5 - Susceptibility to Groundwater Flooding \(BGS\)](#)

⁸ SFRA 2024 Map at Appendix A [Figure 3 - Risk of Flooding from Surface Water \(RoFSW\)](#) 0.1% (1 in 1000) risk), which the SFRA suggests may be used to indicate the surface water risk with climate change.

⁹ [Catchment Approach to Flood Risk Management | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/catchment-approach-to-flood-risk-management)

site was greenfield of previously developed land, as this has implications for the effects of development on drainage at the site and the wider area.

- 2.29 It is notable that the vast majority of sites considered for allocation are affected by surface water risk in some form. Around two thirds of the sites are considered to be at Risk of Flooding from Surface Water under the RoFSs mapping, and 85% lie in drainage priority areas as identified in CMPs. Taken together, only 3 of the 48 sites considered are affected by neither. It was therefore not considered to be a realistic or reasonable proposition to seek to avoid this risk altogether in the form of not allocating sites. For this reason, as noted at paragraph 2.9 and the note in Appendix 1, surface water risk was not considered as part of the sequential approach to site selection.
- 2.30 Instead, the information gathered through the site assessments served to highlight those sites that have a risk of surface water flooding. This will be used to highlight drainage standards and requirements in any allocation policies. The common incidence of this risk also supports the need for a drainage policy for the whole borough.

Stage C: Sustainability Appraisal

- 2.31 Following the detailed interrogation of flood risk data on all the sites, the information assembled in this report was applied in the consideration of
- 1) alternative development strategy options
 - 2) possible site allocations
 - 3) draft policies.
- 2.32 The principal vehicle for this assessment was the Sustainability Appraisal.
- 2.33 In the SA, flood risk was considered under the objective 'To promote healthy, inclusive and safe places', using assessment criterion 4g: 'Does the policy or site allocation avoid and/or mitigate flood risk?'. This test was applied to consider alternative development strategy options, to consider possible site allocations and to test draft policies. The expected effects are noted in the SA report¹⁰ and its detailed appendices¹¹.
- 2.34 Since the SA is designed to cover a multitude of topics, the information presented there regarding flood risk is necessarily limited, focussing on the outcomes of the assessment rather than the detailed information that sits behind it. The SA report highlights that the assessment of the full range of flood risks has been set out at through a Strategic Flood Risk Assessment of sites [this report], which allows the complexity of this topic to be considered in a more nuanced and detailed way. To inform the SA, the table at Appendix 2 summarises the flood risk findings from this report for all the sites considered.
- 2.35 The two reports should therefore be understood to be closely aligned, functioning in conjunction to tell the story of how the Council has considered flood risk in arriving at its development strategy and the proposed site allocations in the plan. Each report may be understood without referring to the other, however.

¹⁰ (RA2) [Sustainability Appraisal of the Draft Local Plan and Appendices A, D and E](#)

¹¹ (RA2-A) [Appendix B - Topic Policies](#) and (RA2-B) [Appendix C - Sites](#)

3. Findings

Summary

- 3.1 This review has pulled together flood risk information for all the sites considered for allocation in the Draft 'Building a Better Future' Havant Local Plan to 2043.
- 3.2 Those with very notable risks were excluded from consideration through the SHELAA, as being unsuitable, marking the first stage in seeking to avoid sites at risk.
- 3.3 Of the remaining sites, many have been shown to be free from the risk of tidal or fluvial flooding. For others, it is possible to avoid flood risk within the site.
- 3.4 For those sites with more fundamental issues the nature of flood risk has been considered in greater detail. Only those sites, where it is considered that there is a reasonable prospect that flood risk may be overcome, or where there are overriding sustainability reasons to support development even in the light of flood risk have been suggested for allocation.
- 3.5 The vast majority of sites are subject to risk from surface water, and drainage will need to be carefully considered at each site.
- 3.6 This documents views flood risk in isolation. This is of course not the only factor to be considered in determining whether to take forward a site as a development allocation in the Local Plan. The findings of this report have formed just one part of the Sustainability Appraisal of the Local Plan, where the final conclusion as to whether to allocate a site is drawn.

Implications for the Local Plan

- 3.7 As well as determining which sites are suitable for allocation, the work has highlighted a number of other matters to be considered in developing the Local Plan:
 - a) The development strategy should take into account the risk to the access road onto Hayling Island.
 - b) For sites that are subject to flood risk, even where it has been determined through this assessment that safe delivery is possible, the site allocation policy should highlight the flood risk and set a development requirement that it must be dealt with satisfactorily before development can go ahead, together with any more site specific requirements established through this assessment.
 - c) The level of flood risk in the borough supports the need for two topic policies covering Flood Risk generally and Drainage specifically. Together, these will ensure developers fully consider flood risk and drainage and deliver a package of measures to ensure sites are safe from flooding and flood risk and drainage are adequately managed into the future. They should include requirements to:
 - Undertake site specific flood risk assessments
 - meet the sequential and exception tests as set out in the NPPF;
 - demonstrate that development will be safe over its lifetime without increasing flood risk elsewhere;

- put in place appropriate flood warning and evacuation plans
 - make contributions towards any identified flood alleviation scheme(s).
 - Reflect requirements for reductions or limitations in run off rates as set out in guidance by the LLFA, with stricter requirements applying in drainage priority areas;
 - Design drainage systems so that they meet the drainage needs of the development in full over the lifetime of the development and do not increase flood risk elsewhere;
 - Incorporate sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) The Council should continue to work with its partners to bring about strategic flood risk management schemes, this includes Coastal Defence Schemes and fluvial flood risk management schemes. Any schemes known at the time of writing should be highlighted in the Council's Infrastructure Delivery Plan and/or relevant policies in the plan, and land should be safeguard for their delivery.

Future Planning Applications

- 3.8 The information presented in this report will facilitate decisions on the strategic allocation of sites for future development. This does not preclude the need for developers to undertake site specific flood risk assessments (FRAs).
- 3.9 This document, by its very nature, is a high level assessment of flood risk at the local authority level. It does not provide sufficiently detailed information to satisfy all of the requirements of a site specific FRA as outlined in the NPPF and the PPG. As such these will still be required on sites in Flood Zones 2 and 3 or of sites 1 hectare or more in size in Flood Zone 1. These will also have to consider all sources of flooding.
- 3.10 The information presented in this report may be used as a starting point by applicants undertaking the Sequential Test for their individual site.

Appendix 1: Sequential Test

'Low Risk' Group 1a: Sites unaffected by tidal or fluvial flood risk

The sites presented below all wholly in Flood Zone 1, now and in the future. There are no particular notable flood risk issues in the wider area in which the site is located. These sites are considered to be the lowest risk sites across the borough.

Site Ref	Site Name	Proposed Use	Commentary
BL02	Civic Campus Broad Location	Mixed use incl Residential	Site wholly in FZ1, now and in the future
BL03	Waterlooville Town Centre	Mixed use incl Residential	Site wholly in FZ1, now and in the future
BL04	Leigh Park Town Centre	Mixed use incl Residential	Site wholly in FZ1, now and in the future
EM01	Land north of Long Copse Lane (western site)	Residential	Site wholly in FZ1, now and in the future
EM02	Land north of Long Copse Lane (main site)	Residential	Site wholly in FZ1, now and in the future
HA02	Helmsley House	Residential	Site wholly in FZ1, now and in the future
HA03	Land East of Castle Avenue	Residential	Site wholly in FZ1, now and in the future
HA06	Southleigh Park House	Residential	Site wholly in FZ1, now and in the future
HA09	Oak Park School (South West Corner)	Residential	Site wholly in FZ1, now and in the future
HA15	Belmont Castle Rest Home, 18-20 Portsdown Hill	Residential	Site wholly in FZ1, now and in the future
HA17	Land at the western end of Lower Road, Bedhampton	Residential	Site wholly in FZ1, now and in the future
HA18	Land south of Lower Road (Phase 2)	Residential	Site wholly in FZ1, now and in the future
LP01	Cabbagefield Row	Residential	Site wholly in FZ1, now and in the future
LP02	Strouden Court	Residential	Site wholly in FZ1, now and in the future
LP03	West of Hulbert Road	Residential	Site wholly in FZ1, now and in the future
LP05	Dunsbury Way	Residential	Site wholly in FZ1, now and in the future
LP07	Scottish and Southern Energy Offices (Former Electricity Board)	Residential	Site wholly in FZ1, now and in the future
WA03	Padnell Grange	Residential	Site wholly in FZ1, now and in the future
WA04	The Cowplain School	Residential	Site wholly in FZ1, now and in the future
WA06	Blue Star	Residential	Site wholly in FZ1, now and in the future
WA09	Goodwillies Timber Yard	Residential	Site wholly in FZ1, now and in the future
WA11	MDA Newlands Phase 1 Hambledon Road (Phases 3 and 8)	Residential	Site wholly in FZ1, now and in the future
WA13	Land North of Highbank Avenue	Residential	Site wholly in FZ1, now and in the future

WA14	South Downs College Car Park	Residential	Site wholly in FZ1, now and in the future
WA15	Campdown	Residential	Site wholly in FZ1, now and in the future
ED01	Waterloo Park Elettra Avenue, Waterlooville	Employment	Site wholly in FZ1, now and in the future
ED04	Dunsbury Park Phase 3	Employment	Site wholly in FZ1, now and in the future
ED05	Former Colt Site, New Lane	Employment	Site wholly in FZ1, now and in the future

'Low Risk' Group 1b: Sites with minimal site area at risk of tidal or fluvial flood risk

The sites presented below sites have only a very limited part of the site in Flood Zone 2 or 3, and development of the site could readily avoid that area. There are no particular notable flood risk issues in the wider area in which the site is located. Overall, these sites are considered to be among the low risk sites across the borough in terms of flood risk.

Site Ref	Site Name	Proposed Use	Commentary
HA10	Oak Park School (Main Site)	Housing	The extent of the area in FZ2/3 is limited and could be avoided for development.
HA15	Palk Road	Housing	The extent of the area in FZ2/3 is limited and could be avoided for development.
HA21	Portsmouth Water Headquarters	Housing	The extent of the area in FZ2/3 is limited and could be avoided for development.
LP06	Former Dairy Crest Depot, Dunsbury Way	Housing	The extent of the area in FZ2/3 is limited and could be avoided for development.
ED19	Interbridges West	Employment	The extent of the area in FZ2/3 is limited and could be avoided for development.
ED23	Gas Site, Palmers Road	Employment	The extent of the area in FZ2/3 is limited and could be avoided for development.

Note It is fully acknowledged that sites wholly or partially in Flood Zone 1 and therefore identified as 'low risk' in Groups 1a and 1b may be at risk from non-fluvial and non-tidal sources, most likely surface water. It is also acknowledged that all sources of flooding should be considered in identifying the level of risk at a site. However, in reviewing the flood risk information for all the sites considered to be developable in the SHELAA it was noted that the vast majority were affected in some form by surface water. Just three sites were affected neither by Risk of Flooding from Surface Water Flooding (RoFSW) as shown in the PfSH SFRA nor in a Drainage Priority Area as identified by the relevant Catchment Management Plan. It was therefore determined that in Havant, surface water flood risk does not form a useful measure to distinguish between sites in terms of their level of risk at the plan making level. Surface water was therefore not used to identify whether a site is lower or higher risk here.

'Higher Risk' Group 2 sites

The sites presented below are those that have substantial areas of the site that are at risk of tidal or fluvial flooding and/or there are notable flood risk issues in the wider area in which the site is located. Overall, these sites are considered to be higher risk sites. As such the appropriateness of allocating them through the local plan was considered further through an exception test.

Site Ref	Site Name	Proposed Use	Commentary	Exception Test Commentary	Able to be allocated?
BL01	Havant Town Centre	Mixed use including Housing	In tidal FZ1 now and in the future. Significant parts of the area lie in fluvial FZ2 and 3 from the Lavant Stream. Notable areas are land to the east of Tesco, the Bulbeck Road area east of Park Road South, the south western corner of Havant Park, and Havant bus station. This may include functional floodplain. Best available modelling does not indicate a significant increase in the area at risk in the future. Extent of area at risk is significant.	This area is under consideration for allocation as a broad location for redevelopment opportunities as part of a wider regeneration agenda. As the borough's main town centre, significant sustainability gains are expected from development and regeneration of this area, most notably in sustaining the viability of the town centre and introducing high density, highly accessible residential uses. As a broad location rather than a specific development site, it may be assumed that areas at risk can be avoided.	Y
BL05	Southleigh	Housing led	In tidal FZ1 now and in the future. An L-shaped area in the south east of the site, and further land north of Southleigh Road and west of Horndean Road lies in fluvial FZ2 and 3 from the Nore Barn Stream and West Brook respectively. This may include functional floodplain. Best available modelling does not indicate a significant increase in the area at risk in the future. Extent of area at risk is significant.	The site represents the only significant site in the borough for the comprehensive development of a new community of more than 2000 dwellings. Development of this scale brings with it the opportunity for comprehensive development with substantial sustainability gains not only through significant housing delivery, but associated infrastructure, such as a new local centre, school and significant amounts of greenspace which will be accessible to the wide community. While the areas at risk are significant in size, given the significant size and scale of this strategic site, it is considered that it will be possible to take a comprehensive approach to flood risk on the site, and that it will be possible to avoid areas at risk on site for development.	Y
EM06	Coldharbour Farm	Housing	In tidal FZ1 now and in the future. Roughly the eastern half of the site lies in fluvial FZ2 and 3 of the West Brook. This may include functional floodplain. Best available modelling indicates no increase in future. The area at risk is significant.	While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level. Flood risk at this site has also been considered extensively through a planning application (reference APP/22/00669), including through site specific hydraulic modelling. Information submitted for the application supports the conclusion that flood risk can be avoided at site level.	Y
HA20	Kingscroft Farm	Housing	A limited part at the western edge of the site lies in Flood Zones 2 and 3 in the present day. This may include functional floodplain. Once climate change is taken into account, additional land in the south west of the site is also considered to be at risk in the future. Flood risk on this site is likely to be both	While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level. Flood risk at this site has also been considered extensively through a planning application (reference APP/22/00669), including through site specific hydraulic	Y

Site Ref	Site Name	Proposed Use	Commentary	Exception Test Commentary	Able to be allocated?
			tidally and fluvially influenced. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	modelling. Information submitted for the application supports the conclusion that flood risk can be avoided at site level.	
HI05	Land adjacent to Havant Road and Castlemans Lane	Housing	In fluvial FZ1 now and in the future;. The site is not considered to be at risk of tidal flooding in the present day. However, once climate change is taken into account, the eastern boundary, Castlemans Lane, and the south eastern part of the site is considered to be at risk in the future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level. Tidal flood risk to the single access onto Hayling Island is significant.	It is considered to be possible to avoid the areas at risk on the site and therefore to provide safe development at the site level. However, tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N
HI07	Land between Manor Road and West Lane	Housing	In fluvial FZ1 now and in the future; In tidal FZ1 in the present day. However, once climate change is taken into account a small part in the north eastern corner of the site is considered to be at tidal risk in the future. The extent is very limited and could be avoided for development. Tidal flood risk to the single access onto Hayling Island is significant.	Safe development could be delivered at the site level. Tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N
HI08	Land North of Saltmarsh Lane	Housing	In fluvial FZ1 now and in the future; The southern edge of the site is considered to be at risk of tidal flooding in the present day. However, once climate change is taken into account, additional land (slightly more than half the site) in an arc around the south and west of the site is considered to be at risk in the future. The area at risk is significant and would not be readily avoidable. Tidal flood risk to the single access onto Hayling Island is significant.	Tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N
HI10	West of Glebe Close	Housing	In fluvial FZ1 now and in the future. The site is not considered to be at risk of tidal flooding in the present day. However, once climate change is taken into account, the eastern half of the site is considered to be at risk in the future. The area at risk is significant and would not be readily avoidable.	Tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking	N

Site Ref	Site Name	Proposed Use	Commentary	Exception Test Commentary	Able to be allocated?
			Tidal flood risk to the single access onto Hayling Island is significant.	into account the contribution the site could make to meeting housing need.	
HI15	Fathoms Reach	Housing	Site wholly in FZ1, now and in the future. Tidal flood risk to the single access onto Hayling Island is significant.	Safe development could be delivered at the site level. However, tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N
HI16	Rook Farm	Housing	Site wholly in FZ1, now and in the future. Tidal flood risk to the single access onto Hayling Island is significant.	Safe development could be delivered at the site level. However, tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N
ED03	Dunsbury Park, Phases 1&2	Employment	In tidal FZ1 now and in the future; An area in the east of the northern part of the site is at risk of fluvial flooding now and in the future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	Exception test not required, because proposed for 'less vulnerable' use	Y
ED07	Gas Holder Site, Downley Road, New Lane	Employment	Site in fluvial and tidal FZ1 now and in the future, but significant parts of highway leading to site in fluvial FZ2/3.	Exception test not required as development proposed is 'less vulnerable'	Y
ED17	Langstone Technology Park	Employment	In tidal FZ1 in the present day. However, with climate change taken into account, the southern part of the site is considered to at risk from tidal flooding. The vast majority of the site is not considered to be at risk of fluvial flooding, with only a negligible part shown to be in FZ2. Best available modelling indicates no increase in future. The area at risk is significant and would not be readily avoidable.	Exception test not required, because proposed for 'less vulnerable' use	Y

Site Ref	Site Name	Proposed Use	Commentary	Exception Test Commentary	Able to be allocated?
ED20	Interbridges East	Employment	In tidal FZ1 now and in the future; The northern part of the site lies in FZ2 from the River Ems. Best available modelling indicates no increase in future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	Exception test not required, because proposed for 'less vulnerable' use	Y
ED23	Gas Site, Palmers Road	Employment	In tidal FZ1 now and in the future; The majority of the site is not considered to be at risk of fluvial flooding, with the eastern part lying in FZ2 from the River Ems. Best available modelling indicates no increase in future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	Exception test not required, because proposed for 'less vulnerable' use	Y

Appendix 2: Summary of Site Review for SA

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
BL01	Havant Town Centre	Mixed use incl Housing	In tidal FZ1 now and in the future. Significant parts of the area lie in fluvial FZ2 and 3 from the Lavant Stream. Notable areas are land to the east of Tesco, the Bulbeck Road area east of Park Road South, the south western corner of Havant Park, and Havant station. This may include functional floodplain. Best available modelling does not indicate a significant increase in the area at risk in the future. Extent of area at risk is significant.	2	This area is under consideration for allocation as a broad location for redevelopment opportunities as part of a wider regeneration agenda. As the borough's main town centre, significant sustainability gains are expected from development and regeneration of this area, most notably in sustaining the viability of the town centre and introducing high density, highly accessible residential uses. As a broad location rather than a specific development site, it may be assumed that areas at risk can be avoided.	Y	Part	Y	N	Significant parts of the area lie in fluvial FZ2 and 3 from the Lavant Stream. Parts of the area are at risk of surface water flooding. The site lies in an identified drainage priority area.
BL02	Civic Campus Broad Location	Mixed use incl Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	Parts of the area are at risk of surface water flooding. The site lies in an identified drainage priority area.
BL03	Waterlooville Town Centre	Mixed use incl Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	Y	N	Parts of the area are at risk of surface water flooding. The site lies in an identified drainage priority area.
BL04	Leigh Park Town Centre	Mixed use incl Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	Parts of the area are at risk of surface water flooding. The site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
BL05	Southleigh	Housing led	In tidal FZ1 now and in the future. An L-shaped area in the south east of the site, and further land north of Southleigh Road and west of Hordean Road lies in fluvial FZ2 and 3 from the Nore Barn Stream and West Brook respectively. This may include functional floodplain. Best available modelling does not indicate a significant increase in the area at risk in the future. Extent of area at risk is significant.	2	The site represents the only significant site in the borough for the comprehensive development of a new community of more than 2000 dwellings. Development of this scale brings with it the opportunity for comprehensive development with substantial sustainability gains not only through significant housing delivery, but associated infrastructure, such as a new local centre, school and significant amounts of greenspace which will be accessible to the wide community. While the areas at risk are significant in size, given the significant size and scale of this strategic site, it is considered that it will be possible to take a comprehensive approach to flood risk on the site, and that it will be possible to avoid areas at risk on site for development.	Y	Part	Y	Y	There is risk of fluvial and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
EM01	Land north of Long Copse Lane (western site)	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	N	Y	There is no notable flood risk on the site, but development of a greenfield site has the potential to increase risk of surface water flooding off-site, and the site lies in an identified drainage priority area.
EM02	Land north of Long Copse Lane (main site)	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RofSW	Greenfield	Summary of Risk Commentary
EM06	Coldharbour Farm	Housing	In tidal FZ1 now and in the future. Roughly the eastern half of the site lies in fluvial FZ2 and 3 of the West Brook. This may include functional floodplain. Best available modelling indicates no increase in future. The area at risk is significant.	2	Permission was granted in March 2024 under reference APP/19/01226, demonstrating that the LPA considers it acceptable, even in the light of flood risk. Any allocation would reflect that permission.	Y	Y	Y	Y	There is risk of fluvial and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
HA02	Helmsley House	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	N	Y	Part	The site is not at risk of tidal or fluvial flooding, but is at risk from surface water flooding.
HA03	Southleigh Park House	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	N	Y	N	There is risk of surface water flooding on the site.
HA06	Land East of Castle Avenue	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	N	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site.
HA09	Oak Park School (South West Corner)	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	N	N	There is no notable flood risk on the site, but the site lies in an identified drainage priority area.
HA10	Oak Park School (Main Site)	Housing	In tidal FZ1 now and in the future; The majority of the site is fluvial in FZ1, but the extreme eastern edge of the site close to the Lavant stream lies in fluvial FZ2 and 3. This may include functional floodplain. Best available modelling indicates no increase in future. The extent is very limited and could be avoided for development.	1b	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
HA14	Palk Road	Housing	In tidal FZ1 now and in the future. Parts of the southern edge of the site lie in fluvial FZ2 and 3 of the Hermitage Stream. This may include functional floodplain. Best available modelling indicates no increase in future. The extent is very limited and could be avoided for development.	1b	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.
HA15	Belmont Castle Rest Home, 18-20 Portsdown Hill	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	N	Y	There is no notable flood risk on the site, but development of a greenfield site has the potential to increase risk of surface water flooding off-site and the site lies in a drainage priority area.
HA17	Land at the western end of Lower Road, Bedhampton	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	N	N	There is no notable flood risk on the site, but the site lies in an identified drainage priority area.
HA18	Land south of Lower Road (Phase 2)	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	Y	Y	There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.
HA20	Kingscroft Farm	Housing	A limited part at the western edge of the site lies in Flood Zones 2 and 3 in the present day. This may include functional floodplain. Once climate change is taken into account, additional land in the south west of the site is also considered to be at risk in the future. Flood risk on this site is likely to be both tidally and fluvially influenced. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	2	While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level. Flood risk at this site has also been considered extensively through a planning application (reference APP/22/00669), including through site specific hydraulic modelling. Information submitted for the application supports the conclusion that flood risk can be avoided at site level.	Y	Y	Y	Y	There is risk of fluvial and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
HA21	Portsmouth Water Headquarters	Housing	In tidal FZ1 now and in the future; A small area at the southern edge of the site lies in fluvial FZ2 from the Brockhampton Stream. Best available modelling indicates no increase in future. The extent is very limited and could be avoided for development.	1b	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.
HI05	Land adjacent to Havant Road and Castlemans Lane	Housing	In fluvial FZ1 now and in the future;. The site is not considered to be at risk of tidal flooding in the present day. However, once climate change is taken into account, the eastern boundary, Castlemans Lane, and the south eastern part of the site is considered to be at risk in the future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level. Tidal flood risk to the single access onto Hayling Island is significant.	2	It is considered to be possible to avoid the areas at risk on the site and therefore to provide safe development at the site level. However, tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N	N	N	Y	There is risk of tidal flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. Tidal flood risk to the single access onto Hayling Island is significant.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
HI07	Land between Manor Road and West Lane	Housing	In fluvial FZ1 now and in the future; In tidal FZ1 in the present day. However, once climate change is taken into account a small part in the north eastern corner of the site is considered to be at tidal risk in the future. The extent is very limited and could be avoided for development. Tidal flood risk to the single access onto Hayling Island is significant.	2	Safe development could be delivered at the site level. Tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N	Y	N	Y	There is risk of tidal flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area. Tidal flood risk to the single access onto Hayling Island is significant.
HI08	North of Saltmarsh Lane	Housing	In fluvial FZ1 now and in the future; The southern edge of the site is considered to be at risk of tidal flooding in the present day. However, once climate change is taken into account, additional land (slightly more than half the site) in an arc around the south and west of the site is considered to be at risk in the future. The area at risk is significant and would not be readily avoidable. Tidal flood risk to the single access onto Hayling Island is significant.	2	Tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N	Y	Y	Y	There is risk of tidal and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area. Tidal flood risk to the single access onto Hayling Island is significant.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
HI10	West of Glebe Close	Housing	In fluvial FZ1 now and in the future. The site is not considered to be at risk of tidal flooding in the present day. However, once climate change is taken into account, the eastern half of the site is considered to be at risk in the future. The area at risk is significant and would not be readily avoidable. Tidal flood risk to the single access onto Hayling Island is significant.	2	Tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N	Y	Y	Y	There is risk of tidal and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area. Tidal flood risk to the single access onto Hayling Island is significant.
HI15	Fathoms Reach	Housing	In fluvial and tidal FZ1 now and in the future. Tidal flood risk to the single access onto Hayling Island is significant.	2	Safe development could be delivered at the site level. However, tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N	Y	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area. Tidal flood risk to the single access onto Hayling Island is significant.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
HI16	Rook Farm	Housing	In fluvial and tidal FZ1 now and in the future. Tidal flood risk to the single access onto Hayling Island is significant.	2	Safe development could be delivered at the site level. However, tidal flood risk to the single access onto Hayling Island is significant. This would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. The Council does not consider that this risk can be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need.	N	Part	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area. Tidal flood risk to the single access onto Hayling Island is significant.
LP01	Cabbagefield Row	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	N	N	Y	There is no notable flood risk on the site, but development of this greenfield site has the potential to increase flood risk off-site.
LP02	Strouden Court	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	Y	N	There is minor risk of fluvial flooding on the access to the site, and risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
LP03	West of Hulbert Road	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
LP05	Dunsbury Way	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	N	N	There is no notable flood risk on the site, but the site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
LP06	Former Dairy Crest Depot, Dunsbury Way	Housing	In tidal FZ1 now and in the future; The southern edge of the site is considered to be at risk of fluvial flooding, now and in the future. The extent is very limited and could be avoided for development.	1b	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	There is minor risk of fluvial flooding of the site, and risk of surface water flooding . The site lies in an identified drainage priority area.
LP07	Scottish and Southern Energy Offices (Former Electricity Board, Havant)	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk		Y	Y	N	There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.
WA03	Padnell Grange	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	Y	N	This site is at risk of surface water flooding, and is noted as having high potential for cumulative flood risk.
WA04	The Cowplain School	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	Y	Part	There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.
WA06	Blue Star	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	Y	Y	Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
WA09	Goodwillies Timber Yard	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Y	N	N	There is no notable flood risk on site, but the site lies in an identified drainage priority area.
WA11	MDA Newlands Phase 1 Hambledon Road (Phases 4 and 8)	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	N	N	Y	There is no notable flood risk on the site, but the site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
WA13	Land North of Highbank Avenue	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
WA14	South Downs College Car Park	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	N	N	There is no notable flood risk on site, but development of this greenfield site has the potential to increase flood risk off-site.
WA15	Campdown	Housing	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk	Y	Part	Y	Y	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
ED01	Waterloo Park Elettra Avenue, Waterlooville	Employment	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk, and development proposed is 'less vulnerable'	Y	Y	Y	N	There is surface water flood risk on the site. The site lies in an identified drainage priority area.
ED03	Dunsbury Park Phases 1 & 2	Employment	In tidal FZ1 now and in the future; An area in the east of the northern part of the site is at risk of fluvial flooding now and in the future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	2	Exception test not required, because proposed for 'less vulnerable' use	Y	Part	Y	Y	There is surface water risk and fluvial flood risk on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
ED04	Dunsbury Park Phase 3	Employment	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk, and development proposed is 'less vulnerable'	Y	N	Y	Y	There is surface water risk on the site. Development of this greenfield site has the potential to increase flood risk off-site.
ED05	Former Colt site	Employment	In fluvial and tidal FZ1 now and in the future	1a	Exception test not required, as site considered to be lower risk, and development proposed is 'less vulnerable'	Y	Y	Y	N	There is fluvial and surface water flood risk on the site. The site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
ED07	Gas Holder Site, Downley Road, New Lane	Employment	Site in fluvial and tidal FZ1 now and in the future, but significant parts of highway leading to site in fluvial FZ2/3.	2	Exception test not required as development proposed is 'less vulnerable'	Y	Y	Y	N	There is fluvial flood risk on the access road, and surface water risk on the site. The site lies in an identified drainage priority area.
ED17	Langstone Technology Park	Employment	In tidal FZ1 in the present day. However, with climate change taken into account, the southern part of the site is considered to at risk from tidal flooding. The vast majority of the site is not considered to be at risk of fluvial flooding, with only a negligible part shown to be in FZ2. Best available modelling indicates no increase in future. The area at risk is significant and would not be readily avoidable.	2	Exception test not required, because proposed for 'less vulnerable' use	Y	N	Y	N	There is tidal, fluvial and surface water flood risk on the site.
ED19	Interbridges West	Employment	In tidal FZ1 now and in the future; the vast majority of the site is not considered to be at risk of fluvial flooding, with only the far eastern edge of the site in present day FZ2/3. Best available modelling indicates no increase in future. This also affects one of the potential accesses to the site, though not the assumed main access.	1b	Exception test not required, as site considered to be lower risk, and development proposed is 'less vulnerable'	Y	Part	Y	Y	There is fluvial and surface water flood risk on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.
ED20	Interbridges East	Employment	In tidal FZ1 now and in the future; The northern part of the site lies in FZ2 from the River Ems. Best available modelling indicates no increase in future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	2	Exception test not required, because proposed for 'less vulnerable' use	Y	Y	Y	Y	There is fluvial and surface water flood risk on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.

Site Information			Tidal and Fluvial Risk				Surface Water Risk			Summary Information for SA
Site Ref	Name	Proposed Dev.Type	Sequential Test (SeqT) Commentary	SeqT Sites Group	Exception Test (ExT) Commentary	ExT Passed?	Drainage Priority Area	RoFSW	Greenfield	Summary of Risk Commentary
ED23	Gas Site, Palmers Road	Employment	In tidal FZ1 now and in the future; The majority of the site is not considered to be at risk of fluvial flooding, with the eastern part lying in FZ2 from the River Ems. Best available modelling indicates no increase in future. While the area at risk is not insignificant in size, it is considered that a substantial site area at low risk is available where development could take place, avoiding risk at the site level.	2	Exception test not required, because proposed for 'less vulnerable' use	Y	Y	Y	N	There is fluvial and surface water flood risk on the site. The site lies in an identified drainage priority area.

