Flood Risk in Development Planning: Overview of Assessment Requirements and Information Sources for Applicants

Introduction

Significant areas of the Borough are at risk of flooding, through tidal flood risk from the 48km of coastline and through flood risk from streams. In addition, many small areas across the Borough are at risk from surface water run-off. Climate change is predicted to increase significantly the areas at risk.

In planning for new development, national policy and guidance requires applicants and the Local Planning Authority to take into account not only the present day, but also future flood risk.

Purpose of this note

Information about flood risk is spread over various websites and documents, making it difficult for the layperson to find. This note is designed to signpost the most relevant sources of information for applicants in Havant Borough Council's administrative area. This will help applicants to identify:

- whether a site is considered to be at risk of flooding now or in the future and
- what assessments may be required to accompany a planning application.

Is my site at risk?

The key strategic level sources of information on flood risk are:

- The National Flood Map for Planning (available at https://flood-map-for-planning.service.gov.uk/) provides mapping in a web tool, with a location search function and the ability to draw a line around a search area to receive a basic flood risk report. The tool covers tidal, fluvial and surface water risk and different risk scenarios.

- The Partnership for South Hampshire (PfSH) Strategic Flood Risk Assessment (SFRA) 2024 (available at https://www.havant.gov.uk/planning-services/planning-policy/local-plan/pfsh-strategic-flood-risk-assessment-2024) is an extensive sub-regional strategic flood risk assessment. It consists of a written report for the whole PfSH area, including a Havant specific report and mapping. The map sets are not currently available in interactive form and can only be accessed in PDF format. As well as the map sets listed in the table below, the SFRA provides a range of additional flood risk data, such as the likely depth of flooding and hazard levels in times of a flood, which may be useful to site-specific Flood Risk Assessments.

***** PLEASE NOTE *****

While the latest update to the National Flood Map (2025) is more recent than the PfSH SFRA (2024) and is also more easily searchable due to the online mapping tool, the Environment Agency has advised that for some elements the PfSH mapping provides a more accurate picture.

In particular, future tidal and fluvial risk mapping is available on both the national and the sub-regional datasets, but there are discrepancies between the map sets. For future risk, the Environment Agency has advised the Council to rely on the PfSH SFRA until advised otherwise.

Applicants are advised to use the sources as set out in Table 1 below to determine whether their site will be considered at risk now or in the future.

Considering Flood Risk in Planning Applications

Applicants for planning permission for most types of development must demonstrate how flood risk from all sources has been avoided, or where this is not possible, how it has been assessed and mitigated to ensure the development is safe for its lifetime, without increasing flood risk elsewhere. Depending on the size, location and nature of the development, and the nature of the flood risk, there may be a need for one or both of the following assessments:

- The Sequential Test (and Exception Test)
- Site-specific Flood Risk Assessment (FRA) or Flood Risk Statement

Any required assessments may be presented as a single report or separately.

These requirements arise from the following frameworks:

- National Planning Policy Framework (Chapter 14) www.gov.uk/government/publications/national-planning-policy-framework--2
- National Planning Guidance: www.gov.uk/guidance/flood-risk-and-coastal-change
- Policy CS15 of the Core Strategy www.havant.gov.uk/planning-services/planning-policy/local-plan
- The Havant Local Requirements List www.havant.gov.uk/local-requirements-list

Table 1 below sets out the best available sources of flood risk data to determine whether a Sequential Test and/or a Flood Risk Assessment or Flood Risk Statement will be expected to accompany an application.

Table 1: Is my site at risk? Is a Sequential Test or FRA required?			
Type of Flood Risk	**Time Period**	**Data / Map Set**	**Notes / Assessment Triggers**
Tidal (from the sea)	Present Day	National Flood Map for Planning Select Dataset 'Flood zones 2 and 3' (any land outside of Zones 2 and 3 is considered to lie in Zone 1)	If any part of a site is coloured pale or dark blue it is considered to be at medium to high risk of tidal or fluvial flooding in the present day. The sequential test is required in principle. There are exceptions to this requirement, which are summarised in the Council's Sequential Test Guidance. A site-specific FRA is required for all sites in Flood Zones 2 and 3, and for sites of 1 hectare or more in Flood Zone 1.
Tidal (from the sea)	Future	SFRA Appendix B Figure 2: Future Coastal Flood Zones PDF map shows modelled future tidal flood zones 2&3 for the year 2122. (any land outside of Zones 2 and 3 is considered to lie in Zone 1)	If any part of a site is coloured blue or turquoise, it is considered to be at medium to high risk of flooding in the future, with climate change taken into account. The sequential test is required in principle. There are exceptions to this requirement, which are summarised in the Council's Sequential Test Guidance. A site-specific FRA is required for all sites in Flood Zones 2 and 3, and for sites of 1 hectare or more in Flood Zone 1.
Fluvial (from rivers)	Present Day	National Flood Map for Planning Select Dataset 'Flood zones 2 and 3' (any land outside of Zones 2 and 3 is considered to lie in Zone 1)	If any part of a site is coloured pale or dark blue, it is considered to be at risk of tidal or fluvial flooding in the present day. The sequential test is required in principle. There are exceptions to this requirement, which are summarised in the Council's Sequential Test Guidance. A site-specific FRA is required for all sites in Flood Zones 2 and 3, and for sites of 1 hectare or more in Flood Zone 1.
Fluvial (from rivers)	Future	SFRA Appendix A Figure 12: Modelled Flood Extents including Effects of Climate Change PDF map at Figure 12 shows best available modelled future risk extents for rivers and streams. SFRA Appendix A Figure 11: GIS Floodplain Analysis PDF map at Figure 11 provides an indication of areas that could become	If any part of a site is coloured pink to purple in Figure 12, it is considered to be at risk of fluvial flooding in the future, with climate change taken into account. The sequential test is required in principle. There are exceptions to this requirement, which are summarised in the Council's Sequential Test Guidance. Since the modelling that informed Figure 12 did not use specific climate change allowances, the data for the 300mm increase on map set 11 should be used to identify when additional flood risk assessment work might be needed. Areas potentially at risk as identified by Figure 11 do not

		flooded if the water level were to increase by a set level (300mm or 600mm).	require a sequential test. However, this risk should be considered through a site-specific FRA.
Surface Water	Present Day	National Flood Map for Planning Select Dataset 'Surface water' and 'Annual likelihood of flooding' 1 in 30 or 1 in 100 (1 in 1000 year indicates low (0.1% annual) probability in the present day). (NB SFRA Appendix A Figure 3: Risk of Flooding from Surface Water (RoFSW) at 2024 shows the same information, but will remain static, whereas the National Map will be updated as new data emerges).	1 in 30 year indicates high (3.33% annual) probability in the present day 1 in 100 year indicates medium (1% annual) probability in the present day While the starting point in national and local policy is that these areas should be avoided for development wherever possible, it is acknowledged that in the Havant Borough area, the pockets at risk are so numerous (and in most cases small in scale) that the sequential test would be meaningless in most cases, particularly when other sources of flood risk are also taken into account. The sequential test will therefore not be required for sites with identified surface water risk. However, the sequential approach should be taken on site, with the area at risk being avoided for built form wherever possible. Where this is not possible, the applicant should demonstrate why not and give particular attention to the drainage strategy for the site. A site-specific FRA will be required, in line with footnote 63 of the NPPF (2024), on land which has been identified by the Environment Agency as having critical drainage problems. This will be taken to be the case where the site falls into the 1 in 30 or 1 in 100 year probability bracket. Whether a site lies in an area of surface water risk or not, applications for all new buildings and engineering work should consider their drainage arrangements in detail, including Sustainable Drainage Systems (SuDS) wherever practical. The risk of surface water flooding on and near the site should be considered in the site-specific FRA (where required) and mitigated fully through the drainage strategy for the site. Where an FRA is not otherwise required (i.e. where there is no particular flood risk identified from any source), a Flood Risk Statement should be provided, proportionate in scale and detail to the size of the development proposed (i.e. it is not intended to be a full FRA). An FRS is not required for extensions to houses and changes of use where no building or engineering works are proposed.
Surface Water	Future	National Flood Map for Planning Select Dataset 'Surface water' and 'Annual likelihood of flooding' 1 in 1000 (NB SFRA Appendix A Figure 3: Risk of Flooding	1 in 1000 year indicates low (0.1% annual) probability in the present day. The SFRA states that it is possible to use with caution the 1 in 1000 year probability mapping to provide an indication of the implications of climate change on surface water flood risk in the future. While the starting point in national and local policy is that these areas should be avoided for development wherever possible, it is

		from Surface Water (RoFSW) at 2024 shows the same information, but will remain static, whereas the National Map will be updated as new data emerges).	acknowledged that in the Havant Borough area, the pockets at risk are so numerous that the sequential test would become meaningless in most cases, particularly when other sources of flood risk are also taken into account. The sequential test will therefore not be required for sites with identified surface water risk now or in the future. However, the sequential approach should be taken on site, with the area at risk being avoided for built form wherever possible. Where this is not possible, the applicant should demonstrate why not and give particular attention to the drainage strategy for the site. In line with footnote 63 of the NPPF (2024), an FRA will also be required on land identified in a strategic flood risk assessment as being at increased flood risk in future (i.e. that affected by the 1 in 1000 year probability) or where its development would introduce a more vulnerable use. Whether a site lies in an area of surface water risk or not, applications for all new buildings and engineering work should consider their drainage arrangements in detail, including Sustainable Drainage Systems (SuDS) wherever practical. The risk of surface water flooding on and near the site should be considered in the site-specific FRA (where required) and mitigated fully through the drainage strategy for the site. Where an FRA is not otherwise required (i.e. where there is no particular flood risk identified from any source), a Flood Risk Statement should be provided, proportionate in scale and detail to the size of the development proposed (i.e. it is not intended to be a full FRA). An FRS is not required for • Householder extensions • Changes of use where no building or engineering works are proposed • Conversions where proposed building or engineering works are internal only.
Groundwater	Present Day	SFRA Appendix A Figure 4 - Area Susceptible to Groundwater Flooding (EA) SFRA Appendix A Figure 5 - Susceptibility to Groundwater Flooding (BGS)	Map sets identify areas where geological and hydrological conditions could enable groundwater flooding to emerge, but they do not show risk of groundwater flooding. This data will therefore not trigger the need for a sequential test or site-specific FRA, though groundwater should be considered if an FRA is required.
Groundwater	Future		

The Sequential Test (and Exception Test)

The first aim of national planning policy and guidance and of local policy is to avoid development in areas at risk of flooding. The National Planning Policy Framework (NPPF) is

clear 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’. Planning Practice Guidance further elaborates on the sequential approach to the location of development in the light of flood risk: https://www.gov.uk/guidance/flood-risk-and-coastal-change#the-sequential-approach-to-the-location-of-development

Applicants for development in areas at risk of flooding are required to demonstrate that there are no reasonably available alternative sites with a lower probability of flooding that could accommodate the development proposed. This Sequential Test is required for all major and non-major development on sites at risk of flooding. This applies to the present day flood risk AND areas at risk in the future.

The Council has put together a guide to the Sequential Test, which clarifies how the test will be applied to development proposals in Havant:

- Flood Risk in Development | Havant Borough Council

If the sequential test is passed, applicants will also need to demonstrate that the Exception Test can be passed. This is covered in the same guidance as the Sequential Test, linked above.

Site-specific Flood Risk Assessment (FRA)

A flood risk assessment (FRA) is a document that assesses a proposed development in light of the risk of flooding from all sources. It should be site-specific and should take into account the surrounding area, both in terms of risk nearby which may affect the access to the site, but also any risk the development could pose to surrounding land by changing water flows and storage areas. In doing so, it is the key tool to demonstrate that development will be safe for its lifetime, without increasing flood risk elsewhere.

National guidance on how to undertake Flood Risk Assessments is available at:

- Environment Agency Standing advice on Flood Risk Assessments for Applicants: www.gov.uk/guidance/flood-risk-assessment-standing-advice
- Flood Risk Assessment Section of National Guidance on Flood risk and Coastal Change: https://www.gov.uk/guidance/flood-risk-and-coastal-change#para20
- The National Guidance also includes a FRA checklist: https://www.gov.uk/guidance/flood-risk-and-coastal-change#para80

When applicants submit a flood risk assessment as part of their planning application, the Council in most cases seeks Environment Agency advice on its acceptability.

Flood Risk Statements

The surface water drainage system is an important factor in management of local flood risk. In cases where a full Flood Risk Assessment is not required, a Flood Risk Statement (FRS) should be submitted with all applications involving new buildings and engineering works. A Flood Risk Statement is not required for householder extensions, or applications where no building or engineering works are proposed (such as changes of use).

A Flood Risk Statement should describe in outline terms the existing and proposed surface water drainage system associated with a proposal and should include consideration of using Sustainable Drainage Systems (SuDS) techniques where these are practical. The Statement should be proportionate in scale and detail to the size of the development proposed (i.e. is not intended to be a full FRA) and should demonstrate that development will not increase, and wherever possible, will reduce run-off rates and volumes.

Guidance on Sustainable Drainage can be found at

- The SuDS section of National Planning Guidance on Flood risk: www.gov.uk/guidance/flood-risk-and-coastal-change#sustainable-drainage-systems
- From Hampshire County Council as Local Lead Flood Authority: www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning
- National SuDS Guidance by Susdrain.org: https://www.susdrain.org/delivering-suds/using-suds/design-guidance/guidance-overview.html

Pre-Application Advice

All applicants are encouraged to discuss their flood risk and drainage strategies and information needs at the earliest opportunity through pre-application discussions with Havant Borough Council's Planning Team.

In some cases, particularly for more significant developments or areas at significant risk, it is also advisable to seek pre-application advice from the Environment Agency and/or the Lead Local Flood Authority (Hampshire County Council).