



Flood Risk Sequential Test & Exception Test

Guidance for Applicants & Planning Officers

January 2026

1. INTRODUCTION: ASSESSING FLOOD RISK IN DEVELOPMENT APPLICATIONS

1.0.1. The main two tools in assessing flood risk in development applications are site specific flood risk assessments (FRAs) and sequential / exception testing. While there is some interaction between these assessments, it should be noted that not all development applications will require both pieces of work. They also fulfill different functions and are assessed in different ways.

1.1 SEQUENTIAL & EXCEPTION TESTS VS FLOOD RISK ASSESSMENTS (FRA)

1.1.1 The purpose of the sequential test is to guide development to areas at lowest risk of flooding, by requiring applicants to demonstrate that there are no alternative lower risk sites available where the development could take place. Site level flood risk assessments are detailed technical studies on the risk of flooding at a site and its surroundings. Their purpose is to assess whether development will be safe for its lifetime and can be delivered without increasing flood risk elsewhere.

1.1.2 Where both are required, the two pieces of work may be presented together as a comprehensive flood risk evidence package. For example, the sequential test may be presented as part of the FRA and/or the FRA can help demonstrate that development will be safe to satisfy the exception test.

1.1.3 In most cases the Environment Agency (EA) will comment on applications where an FRA is required and will give advice to the Council on the content and conclusions of the FRA. The Local Lead Flood Authority (LLFA) – in Havant's case Hampshire County Council – as well as infrastructure providers such as water companies may also comment on flood risk matters. These bodies, however, will not comment on sequential & exception test documentation, as it is for the Council to judge its acceptability.

1.1.4 Given the different purposes of these assessments, it must be noted that the conclusions on these studies may differ. The Council may accept that there are no sequentially preferable sites elsewhere and that therefore the sequential test is passed, but the site may still not be considered safe for development if the FRA does not adequately demonstrate that it is. Or the FRA may adequately demonstrate that a site can be made safe for its lifetime without increasing flood risk elsewhere, but the applicant may not have been able to demonstrate that there are no lower risk sites available that could accommodate the development.

1.1.5 Applicants should therefore note that the absence of an objection from the EA or another body does not indicate that all matters relating to flood risk, and in particular the sequential and exception tests, have been successfully addressed.

2. SEQUENTIAL AND EXCEPTION TESTING: NATIONAL GUIDANCE

2.1 BACKGROUND

2.1.1 The sequential approach to flood risk and the use of the sequential test and the exception test in planning applications is one of the mainstays of national guidance on

development and flood risk. The general approach is designed to ensure that areas at no or low risk of flooding are developed in preference to areas at higher risk. The aim at both the plan making and decision making stage is, where possible, to keep development out of medium and high flood risk areas (Flood Zones 2 and 3 for tidal and fluvial flood risk and areas affected by other sources of flooding). The sequential approach should be taken both at a borough wide and whole site level, but also within any given site. Ideally sites at risk should be avoided entirely, but where development is necessary and there is variation in risk within the site, applicants should consider a layout which directs development to areas at lower risk.

2.1.2 While the overall aim of national planning policy is clear, the guidance allows for a degree of local discretion, depending on the characteristics of the area and the development in question. The information available to guide the test will also vary from area to area. This note has been put together to set a framework for a consistent approach at a local level.

2.1.3 This local guidance is based largely on

- NPPF (2024) Chapter 14: 'Meeting the challenge of climate change, flooding and coastal change' <https://www.gov.uk/guidance/national-planning-policy-framework>;
- Planning Practice Guidance on 'Flood Risk and Coastal Change': www.gov.uk/guidance/flood-risk-and-coastal-change;
- The experience of Havant Borough Council in applying national guidance at the local level
- Flood risk related appeals and high court decisions.

2.2 STATUS OF THIS NOTE

2.2.1 This note pulls together national requirements for sequential test and the exception test and sets out how they should be applied to individual applications in Havant Borough. It is intended to help guide applicants through the process as well as provide a tool for consistent decision making by planning officers.

2.2.2 It is not possible to cover every kind of development, location and flood risk scenario in this note.

2.2.3 Applicants are advised to engage in pre-application discussions and to agree the parameters of sequential and exception tests with planning officers at the pre-application stage.

2.2.4 PLEASE NOTE! This note focusses on the sequential test and associated exception test and how the Council will expect applicants to demonstrate compliance with these. It does not include guidance on site specific flood risk assessments.

2.2.5 Guidance on FRAs is available at www.gov.uk/guidance/flood-risk-and-coastal-change and www.gov.uk/guidance/flood-risk-assessment-for-planning-applications.

3. SEQUENTIAL TEST REQUIREMENTS IN HAVANT BOROUGH

3.1 WHEN IS A SEQUENTIAL TEST REQUIRED?

3.1.1 The sequential test is required for all ‘major’ and ‘non-major’ development proposed in areas at risk of flooding, either now or in the future.

3.1.2 In this context, the starting point for consideration of ‘the site’ should be the application red line, not just the proposed built form.

3.1.3 Proposals are exempted from the test requirement through national policy and guidance, where:

- a) The proposal is for minor development. For the purposes of considering flood risk, minor development is defined¹ as
 - i. minor non-residential extensions (industrial/commercial/leisure etc): extensions with a floorspace not in excess of 250 square metres.²
 - ii. alterations: development that does not increase the size of buildings, e.g. alterations to external appearance.
 - iii. householder development: for example, sheds, garages, games rooms etc. within the curtilage of the existing dwelling, in addition to physical extensions to the existing dwelling itself. This definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling (e.g. subdivision of houses into flats) or any other development with a purpose not incidental to the enjoyment of the dwelling.³
- b) The proposal is for a change of use. This includes changes of use to residential, unless the proposal is for a caravan, camping or chalet site, mobile home or park home site⁴.
- c) No built development within the site boundary would be located on an area that would be at risk of flooding from any source now or in the future. In this context ‘built

¹ Paragraph: 051 Reference ID: 7-051-20220825 of the NPPG (Revision date: 25 08 2022)

² In addition to this specific exemption, PPG Paragraph: 027a Reference ID: 7-027a-20220825 Revision date: 17 09 2025 advises that ‘A pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.’ Therefore, extensions larger than 250sqm may also be exempted from the sequential test on a case by case basis.

³ Although not explicitly included in the national guidance in paragraph 051 of the PPG, the Council will take residential annexes to be a type of householder development which is exempted from the sequential test requirement. Similarly, guest accommodation in the grounds of existing dwellings, such as shepherd’s huts and pods will not require the application of the test. (Such accommodation in the grounds of existing commercial properties such as hotels will be treated as a ‘minor non-residential extension’).

⁴ Paragraph 176 of the NPPF (2024) and footnote 62 of the NPPF (2024)

development' includes access or escape routes, any areas of land raising or other potentially vulnerable elements⁵.

- d) The site is allocated (for the same use as the proposal) in a Local Plan⁶. This is because for allocated sites, it is taken as given that the Council will have undertaken a sequential test, so the applicant no longer needs to demonstrate it.

3.1.4 In addition to these national exceptions, Havant Borough Council will exempt the following cases from the sequential test requirement. The applicant should confirm with the Council that a sequential test is not required, where the proposed development is for

- a) Sites where the only identified flood risk is from surface water. While the starting point in national and local policy is that these areas should be avoided for development wherever possible, paragraph 027 of the PPG indicates that a proportionate approach should be taken to the application of the sequential test '*where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development [...], without increasing flood risk elsewhere.*' In addition, the Council acknowledges that in the Havant Borough area, the pockets at surface water flood risk are so numerous (and in most cases small in scale) that the sequential test would be of limited value, it being extremely difficult to identify sites that are at lower risk, particularly when other sources of flood risk are also taken into account. The sequential test will therefore not be required for sites where surface water risk is the only type of flood risk. Applicants are expected to take particular care with the drainage strategy for their site.
- b) Non-permanent non-residential development (eg storage containers, kiosks etc)
- c) Commercial and leisure uses that require a coastal location, eg marine businesses; water sports centres, wharves, sailing clubs etc. This does not include uses such as hotels which might benefit from a coastal location, but do not strictly require it, or diversification of waterfront sites such as proposals for residential uses within marina sites.
- d) Development classified as 'water compatible' in [Annex 3 of the NPPF](#)
- e) Redevelopment of existing properties: For replacement dwellings, where there is no increase in the number of dwellings, the sequential test will not be required. In recognition of the fact that householders would be able to extend a dwelling without applying the sequential test (see householder development above), replacement dwellings with a larger footprint than the original dwelling, or extending upwards by converting upper floors or adding storeys, will also not be required to pass the test. However, if additional dwellings are being created, for example, by replacing a single house with a number of flats, or adding self-contained dwellings in the grounds of existing dwellings, the test will be required.

⁵ Paragraph 175 of the NPPF (2024); and PPG Paragraph: 027 Reference ID: 7-027-20220825 Revision date: 17 09 2025

⁶ Paragraph 180 NPPF (2024)

- f) In the case of replacement caravans, where these are like for like replacements with no increase in the level or annual period of occupancy, then the sequential test is unlikely to be required. However, where the risk increases, including by virtue of occupancy periods increasing, the test would be required. Similarly, proposals to replace a caravan with a permanent dwelling will be considered as a new dwelling, and if at risk of flooding, would require the sequential test to be passed.
- g) Where a new application is made on a site with extant permissions for the same use, type and scale of development, whether the test is required will depend on the nature of the new permission. The extent of the changes from the previous scheme and whether the flood risk situation, information or policy position has changed in the intervening time will be determining factors. For example, if changes are limited to design details, such as windows, doors or roofs, the sequential test will not be required. However, where the new application seeks a significant change, such as a larger footprint, or likely higher occupancy, the sequential test may be needed. Where further flood risk information or guidance has emerged since the granting of the original permission which shows a higher risk than previously, the sequential test may also be required.

3.1.5 It should be noted that national guidance is clear that the absence of a 5-year housing land supply is not a relevant consideration in applying the sequential test for individual applications. However, housing considerations, including housing land supply, may be relevant in the planning balance, alongside the outcome of the sequential test.⁷

3.2 WHAT AREAS ARE AT RISK?

3.2.1 With the exception of the scenarios set out in the previous section, sequential testing is expected to take place for all sites at risk of flooding. This includes risk from any source, both in the present day and in the future taking into account climate change.

3.2.2 The first paragraph of the NPPG⁸ confirms that

‘Areas at risk of flooding are those at risk of flooding from any source, now or in the future. 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...’

3.2.3 The Council has put together a guide to ‘Flood Risk information for Applicants’, which points to the best sources of flood risk information to use in a planning context. It is available at: [Flood Risk in Development | Havant Borough Council](#)

3.3 WHO IS RESPONSIBLE FOR THE TEST?

3.3.1 The applicant for any proposal requiring a sequential test is expected to assemble the evidence to allow the Council to consider whether the development passes the test.

⁷ Paragraph: 027 Reference ID: 7-027-20220825 Revision date: 17 09 2025

⁸ Paragraph: 001 Reference ID: 7-001-20220825 Revision date: 25 08 2022

3.3.2 The Council will consider the evidence provided and determine whether it can be concluded that there are no reasonably available alternative sites appropriate for the proposed development in areas with a lower probability of flooding. If it is demonstrated that there are no reasonably available alternative sites, the sequential test is deemed to have been passed.

3.4 WHAT DOES A SEQUENTIAL TEST LOOK LIKE?

3.4.1 The checklist for flood risk assessments contained in the national Guidance contains a section on the sequential test at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para80>⁹.

3.4.2 There is, however, no prescribed format for the sequential test. Overall, the information provided should be of sufficient quality and detail to answer the question: **Are there, or are there not, any reasonably available sites in areas with a lower probability of flooding that would be appropriate to accommodate the type of development or land use proposed?**

3.4.3 Applicants are therefore advised to submit a sequential test report covering the following information:

A: Information about the application site and development proposal

3.4.4 This should include the name, location, size, assumed development capacity, overview of the development proposal, high level overview of flood risk (flood zones - present day and with climate change), any other pertinent information, such as the reason for choosing the particular site.

B: Site Search and Review

3.4.5 Sequential test documentation should include a map or a clear description of the area of search, together with the reasons for choosing that area. It should also clearly explain and justify any limiting parameters applied to the site search, such as size/capacity; particular locational requirements etc. Applicants should discuss and agree the search parameters with the Local Planning Authority before the sequential test is undertaken, to avoid the need to redo the test in the event that the Local Planning Authority disagrees with the approach taken.

→ See guidance below on 'Area of Search - Section 3.5'

→ See guidance below on 'Suggested Sources of Potential Alternative Sites – Section 3.6'

3.4.6 Applicants should provide a clear schedule of alternative sites considered, with maps where this is needed to clearly identify sites. For each site, this review should identify the level of flood risk at the alternative site and whether or not it is considered to be a suitable

⁹ PPG Paragraph: 080 Reference ID: 7-080-20220825 Revision date: 25 08 2022

and reasonably available alternative. This should make reference to the matters set out in national guidance and section 3.7 of this note.

→ See guidance below on ‘What Constitutes a Suitable Reasonably Available Site?’ – Section 3.7’

3.4.7 If the applicant proposes to reject a lower risk site as an alternative to the application site, clear reasons should be given in the sequential test documentation for why the site is considered unsuitable or unavailable.

C: Conclusion

3.4.8 If there are no suitable alternative reasonably available sites at lower flood risk than the application site, the conclusion may be drawn that the site and proposed development have passed the sequential test. If required by national guidance (see Table 2 of the NPPG), the exception test must then be passed to make the development acceptable in flood risk terms.

3.5 AREA OF SEARCH

3.5.1 National guidance does not define the area of search that should be applied. Instead, it suggests that the area will be defined by local circumstances and the type of development proposed, together with relevant spatial policies¹⁰. Appeal decisions in the borough¹¹ and elsewhere have confirmed that the starting point should be all parts of the local authority area at lower flood risk. This should then be amended if there are sustainable development reasons for doing so. In most cases, the Council’s starting point for the area of search for lower risk sites will therefore be the whole borough. Any variation should be agreed between the applicant and the Council before the test is undertaken and justified by the applicant in their sequential test report.

3.5.2 An alternative (reduced) area of search may be acceptable where it can be demonstrated that there is a specific need for the proposed development to be in a particular sub-area. The area of search may be influenced by the purpose or nature of the development itself (e.g. a particular catchment area it intends to serve, its functional or locational requirements etc), but also wider policy objectives (e.g. a local need for particular types of housing or town centre regeneration).

3.5.3 In some cases, it may be appropriate to expand the area of search beyond the boundary of the borough. This will only be necessary in the rare cases where the proposed development is proposed to satisfy a sub-regional, regional or national need, such as a very large scale development or a major infrastructure project.

3.5.4 It is not possible to pre-determine an area of search, but the following is suggested as a guide. The table is not designed to cover all development types or scenarios, and case by case consideration will be necessary by applicants and the Council.

¹⁰ NPPG Paragraph: 029 Reference ID: 7-029-20220825’ Revision date: 25 08 2022

¹¹ Appeal Reference: APP/X1735/W/21/3287602

Suggested Sequential Test Area of Search in Havant Borough		
<p><i>The table below provides a suggested starting point for appropriate search areas for different types and locations of development. However, applicants should justify and agree with the Council the search parameters applied to their particular development. Some developments may fall into more than one category.</i></p>		
Type of Development	Area of Search	Reason
Major residential development (10 dwellings or more)	Whole borough	Major residential schemes contribute to housing need across the borough.
Minor residential development (9 dwellings or fewer)	The specific area of the borough in which the proposal is located ¹²	Paragraph 027a of the PPG ¹³ indicates that ‘ <i>For a non-major housing development, it would not usually be appropriate for the area of search to extend beyond the specific area of a town or city in which the proposal is located, or beyond an individual village and its immediate neighbouring settlements.</i> ’
Major commercial development (development where the floorspace to be created is 1,000 square metres or greater)	Whole borough	Major commercial development contributes to the need for such floorspace across the borough and has no particular sub-area it intends to serve. (note exceptions around catchment areas and operational requirements below)
Minor commercial development (development where the floorspace to be created is 999 square metres or less)	The specific area of the borough in which the proposal is located	Paragraph 027a of the PPG ¹⁴ indicates that ‘ <i>For a non-major housing development, it would not usually be appropriate for the area of search to extend beyond the specific area of a town or city in which the proposal is located, or beyond an individual village and its immediate neighbouring settlements.</i> ’ While commercial development is not explicitly covered by this part of the guidance, the Council considers it appropriate to take a similar stance to that taken for residential development
Any development (including residential) on a brownfield site within the urban area / settlement boundary as defined by the adopted Development Plan or a Regulation 19 Local Plan.	The application site only	Paragraph 027a of the PPG ¹⁵ asks that a pragmatic approach be taken to the application of the sequential test ‘ <i>where there are large areas in Flood Zones 2 and 3 (e.g. <u>coastal towns and settlements on major rivers</u>) and development is needed in those areas to sustain the existing community.</i> ’ The Council considers that this applies in Havant Borough, where much of the existing built-up area lies in Flood Zone 2 or 3 now or in the future. Continued development, re-development and renewal is essential to sustaining these areas. It is

¹² The Council considers that in planning terms, there are 5 areas of the borough: Waterlooville / West of the A3(M); Havant & Bedhampton, Leigh Park, Emsworth and Hayling Island. [contractMapping.mxd](#)

¹³ Paragraph: 027a Reference ID: 7-027a-20220825 Revision date: 17 09 2025

¹⁴ Paragraph: 027a Reference ID: 7-027a-20220825 Revision date: 17 09 2025

¹⁵ Paragraph: 027a Reference ID: 7-027a-20220825 Revision date: 17 09 2025

		<p>particularly notable in Havant Borough that the identified regeneration areas of Hayling Island seafront and Havant Town Centre include substantial areas in FZs 2&3.</p> <p>The sustainability benefits of focussing development within existing urban areas are well documented, and it is considered that it is not the intention of the sequential test to result in greenfield releases over the renewal and/or intensification of previously developed land within existing settlements. A focus on brownfield development is enshrined both in national and local planning policy.</p> <p>While an in-principle exemption from the sequential test for these sites would be inappropriate, Paragraph 027a of the PPG indicates that in these cases sites outside of Flood Zone 2 and 3 are <i>'unlikely to provide reasonable alternatives'</i>.¹⁶</p> <p>Overall, the Council considers that the sequential test may be considered passed on brownfield sites within the urban area / settlement boundary as defined by the Development Plan or a Regulation 19 Local Plan. However, on these sites, particular attention will be expected to be paid to the exception test, demonstrating both the sustainability benefits and the safety of the proposed development for its lifetime. Resilience measures will also be expected.</p>
Development which has a specifically defined catchment area e.g. new schools; services or businesses specifically intended to serve a particular area	Defined catchment area	Locating the scheme outside of the required catchment area would prevent the development from fulfilling its function. Evidence of the catchment requirement will be required as part of the sequential test.
Development with other location-specific operational requirements	Sites across the borough that meet the particular operational requirement	Locating the development on a site which does not meet operational requirements would prevent the development from fulfilling its function. Evidence of the locational requirements will be required as part of the sequential test.
Schemes of any size and type brought forward by a Community Land Trust, Parish Council or similar body or organisation	Area covered by the relevant body or adjacent sites reasonably related to that area	Such bodies are set up to serve the interests of a particular area and cannot be expected to consider land beyond their catchment area.

¹⁶ Paragraph: 027a Reference ID: 7-027a-20220825 Revision date: 17 09 2025

3.6 SUGGESTED SOURCES OF POTENTIAL ALTERNATIVE SITES

3.6.1 The following are suggested to be suitable sources of information for potential alternative sites. Applicants should consider all relevant sources, including any not listed here.

3.6.2 For sites of 5 dwellings or more:

- Allocation sites in adopted plans (Local Plan and Neighbourhood Plans)
- Allocation sites in emerging or draft plans or policy documents (Local Plan and Neighbourhood Plans)
- Sites in the Strategic Housing and Employment Land Availability Assessment (SHELAA); sites considered by the Council to be developable in the SHELAA have also been assessed in the Council's SFRA of Local Plan sites, summarising relevant flood risk information for these sites at a high level.
- Extant planning permissions for the same or similar developments as that proposed
- Current planning applications for the same or similar developments as that proposed

3.6.3 For sites smaller than 5 dwellings, the most likely sources of alternative sites are

- Extant planning permissions for the same or similar developments as that proposed
- Current planning applications for the same or similar developments as that proposed
- Land currently for sale (search info from local property agents)

3.7 WHAT CONSTITUTES A SUITABLE AND 'REASONABLY AVAILABLE' SITE?

3.7.1 National Guidance suggests in sections 3b and c of its FRA checklist¹⁷ questions that applicants should consider when assessing alternative sites.

Suitable

3.7.2 The Council considers that a site would be suitable if it:

- is in a suitable location for the proposed development type;
- is of a reasonable size for the proposed development, having regard to the Council's density policy;
[NB national guidance is clear that reasonably available sites could include a series of smaller sites¹⁸]
- could accommodate the functional requirements of the proposed development;
- could be viably developed; and
- There are no relevant local and national policies which would provide a strong reason for refusing development on the site (in this context, sites accepted by the council for allocation or draft allocation will be considered acceptable in policy terms).

¹⁷ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para80>

¹⁸ NPPG Paragraph: 028 Reference ID: 7-028-20220825 Revision date: 17 09 2025

Reasonably Available

3.7.3 National guidance includes a definition of what constitutes ‘reasonably available’¹⁹. Applying that definition together with local policy considerations, a site will be considered to be reasonably available by Havant Borough Council if the following criteria are met:

- The site is available to be developed now, defined as either being
 - owned by the applicant or
 - available for purchase at a fair market value or
 - available for development by another party**and**
- The site is not safeguarded or allocated in an adopted or emerging Local Plan or Neighbourhood Plan for another use **and/or**
- The site does not have planning permission for another use.

4. EXCEPTION TEST

4.1 NEED FOR THE EXCEPTION TEST

4.1.1 Once the sequential test has been passed, it may also be necessary to pass the exception test. The exception test is designed to allow appropriate and safe development to proceed in scenarios where the sequential test has been passed, i.e. where it has been shown that suitable sites at lower risk of flooding are not available.

4.1.2 Whether the exception test is necessary is determined by the type and location (in terms of flood risk) of the proposal, and by reference to Table 2 and Annex 3 of the PPG. These tables also show when the exception test is not required, as well as when development is deemed incompatible and should not be permitted at all.

- A classification of the relative vulnerability of different types of development
Annex 3: Flood risk vulnerability classification
<https://www.gov.uk/guidance/national-planning-policy-framework/annex-3-flood-risk-vulnerability-classification>
- A guide to the appropriateness of these classes of development with the flood zones
Table 2: Flood risk vulnerability and flood zone ‘incompatibility’
<https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2>

4.2 PASSING THE EXCEPTION TEST

4.2.1 For the exception test to be passed it must be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; **and**

¹⁹ Paragraph: 028 Reference ID: 7-028-20220825 (Revision date: 25 08 2022)

- 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.

4.2.2 There is no prescribed format for the exception test. However, national guidance suggests that part a) of the test should make reference to the Council's Sustainability Appraisal Framework.²⁰ This can be found in the SA Scoping Report at www.havant.gov.uk/related-studies-and-strategies. A site specific flood risk assessment should be used to inform part b) of the test.

4.2.3 Both elements of the exception test must be satisfied for development to be permitted.

4.3 CONCLUDING THE SEQUENTIAL AND THE EXCEPTION TESTS

4.3.1 Where the sequential test and/or the exception test are required for proposed development in areas at risk of flooding, the required tests must be passed in order for development to be acceptable.

4.3.2 The applicant is expected to assemble the necessary evidence to enable the Council to consider whether the development passes the required test(s).

4.3.3 The Council will consider the evidence provided and determine whether it can be concluded that the tests have been passed. If the sequential test and/or either part of the exception test is considered not suitably justified, and therefore not met, the Council may refuse the planning application on flood risk grounds.

4.3.4 In arriving at that determination, the Council will take into particular consideration:

- Paragraph 174 of the NPPF, which 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.'*

and

- Paragraph 179 of the NPPF, which states that *'Both elements of the exception test should be satisfied for development to be allocated or permitted.'*

4.3.4 In addition, if the Council cannot demonstrate a 5 year housing land supply, it will take into consideration Paragraph 027 of the PPG, which states that *'The absence of a 5-year housing land supply is not a relevant consideration in applying the sequential test for individual applications. However, housing considerations, including housing land supply, may be relevant in the planning balance, alongside the outcome of the sequential test.'*

END

²⁰ PPG Paragraph: 036 Reference ID: 7-036-20220825 Revision date: 25 08 2022