SURREY HEATH BOROUGH COUNCIL

Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)

Sequential & Exception Tests for Site Allocations

March 2025

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1. Introduction

1.1. This Sequential and Exceptions Test forms part of the evidence base supporting the Surrey Heath Pre-Submission Local Plan (2019-2038): (Regulation 19). This Paper updates and replaces the Interim Sequential and Exception Test which was published in August 2024 and takes account of the findings of the Surrey Heath Level 1 Strategic Flood Risk Assessment (L1 SFRA), published in January 2025 and the Surrey Heath Level 2 Strategic Flood Risk Assessment, published in March 2025. This document also has regard to new National Flood Risk Assessment (NaFRA2) mapping for surface water data, which was released subsequent to the publication of the Level 1 SFRA and was taken into account in the preparation of the Level 2 (L2 SFRA).

1.2. The purpose of this Paper is to demonstrate that the sites allocated within the Surrey Heath Pre-Submission Local Plan (2019-2038): (Regulation 19) are suitable for development based on the Sequential Test and Exception Test processes required by National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

2. Policy Context

National Planning Policy Framework (December 2024)

2.1. Paragraph 170 of the National Planning Policy Framework (2024) sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or in the future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2.2. 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 relevant stakeholders (NPPF Paragraph 171).

2.3. Paragraph 172 of the NPPF indicates that a sequential, risk-based approach should be taken to locating development through plans. The purpose of this approach is not to prevent the development of land that has a higher risk of flooding, but to ensure that new development is steered towards areas with the lowest probability of flooding and ensure that development safely responds to the identified risk. All sources of flood risk and both current and future impacts of climate change should be taken into account. The approach should avoid, where possible, flood risk to both people and property. This should be achieved 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;
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.

2.4. Development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It is the expectation that the strategic flood risk assessment will provide the basis for applying this test (Paragraph 174).

2.5. Where the Sequential Test indicates that it is not possible for development to be located in areas with a lower risk of flooding, an exception test may be required. The need for an exception test will depend on the vulnerability of any given site and of the development proposed, in line with the Flood Risk Vulnerability Classification which splits the flood risk vulnerability of different land uses into five categories – essential infrastructure, highly vulnerable, more vulnerable, less vulnerable and water compatible development (see Appendix 1). As with the sequential test, the exceptions test should also be informed by a strategic flood risk assessment, where it is being undertaken at the plan-making stage.

2.6. The NPPF sets out that to pass the exception test, it should be demonstrated that:

a. the development would provide wider sustainability benefits to the community that outweigh the flood risk; and,

b. the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

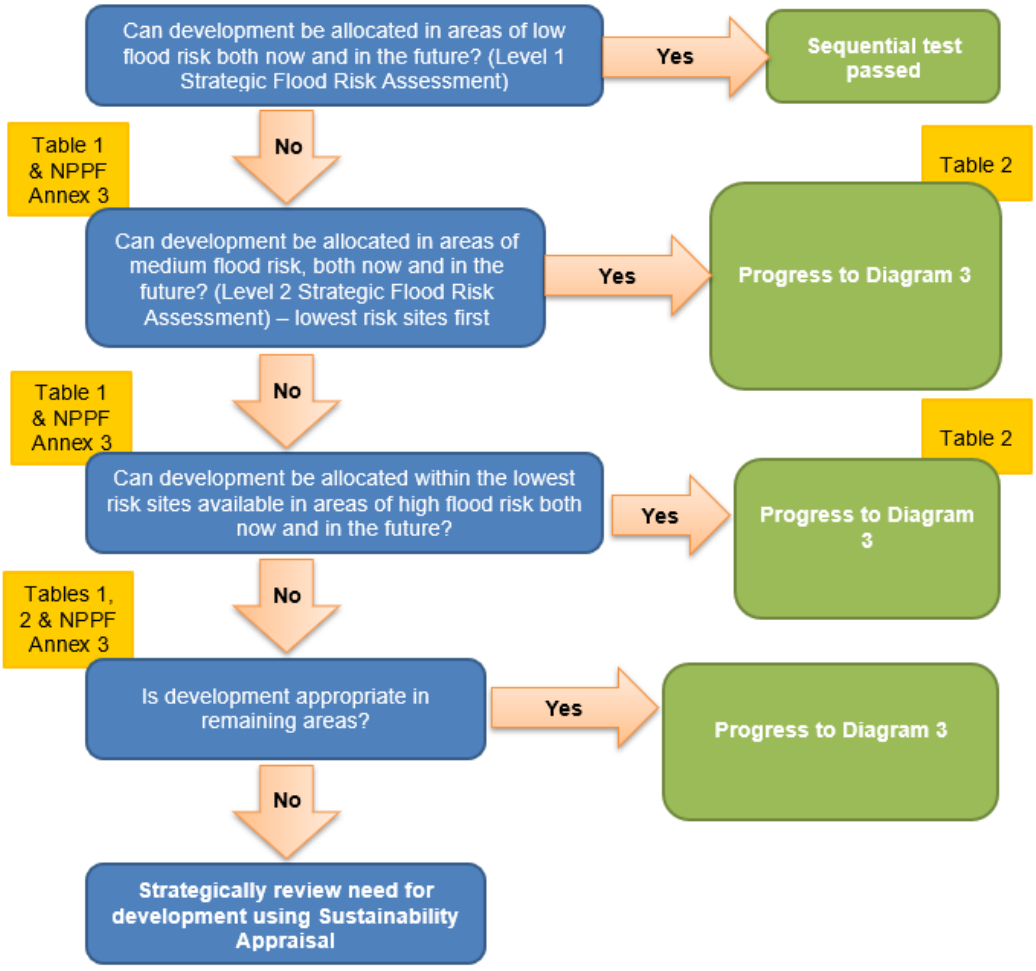
2.7. Whilst guidance set out in the National Planning Policy Framework (2024) is broadly comparable to that set out in its predecessor (the National Planning Policy Framework December 2023, against which the Surrey Heath Local Plan is to be examined), the NPPF 2024 was notably updated to clarify that where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account (Paragraph 180).

National Planning Practice Guidance

2.8. National Planning Practice Guidance sets out that the sequential test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the sequential test should go on to compare reasonably available sites within medium-risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.

2.9. The application of the Sequential Test in plan-making is illustrated through National Planning Practice Guidance and is replicated at Figure 1.

Figure 1: Application of the Sequential Test for plan preparation



2.10. In some cases, it may not be possible for development to be located in zones with a lower risk of flooding. In such cases, development may need to be resisted, or an exception test will need to be undertaken, depending on the type of development proposed. The NPPG provides a matrix to guide flood risk vulnerability assessments of future land uses and sets out when an exception test is required (see Table 1).

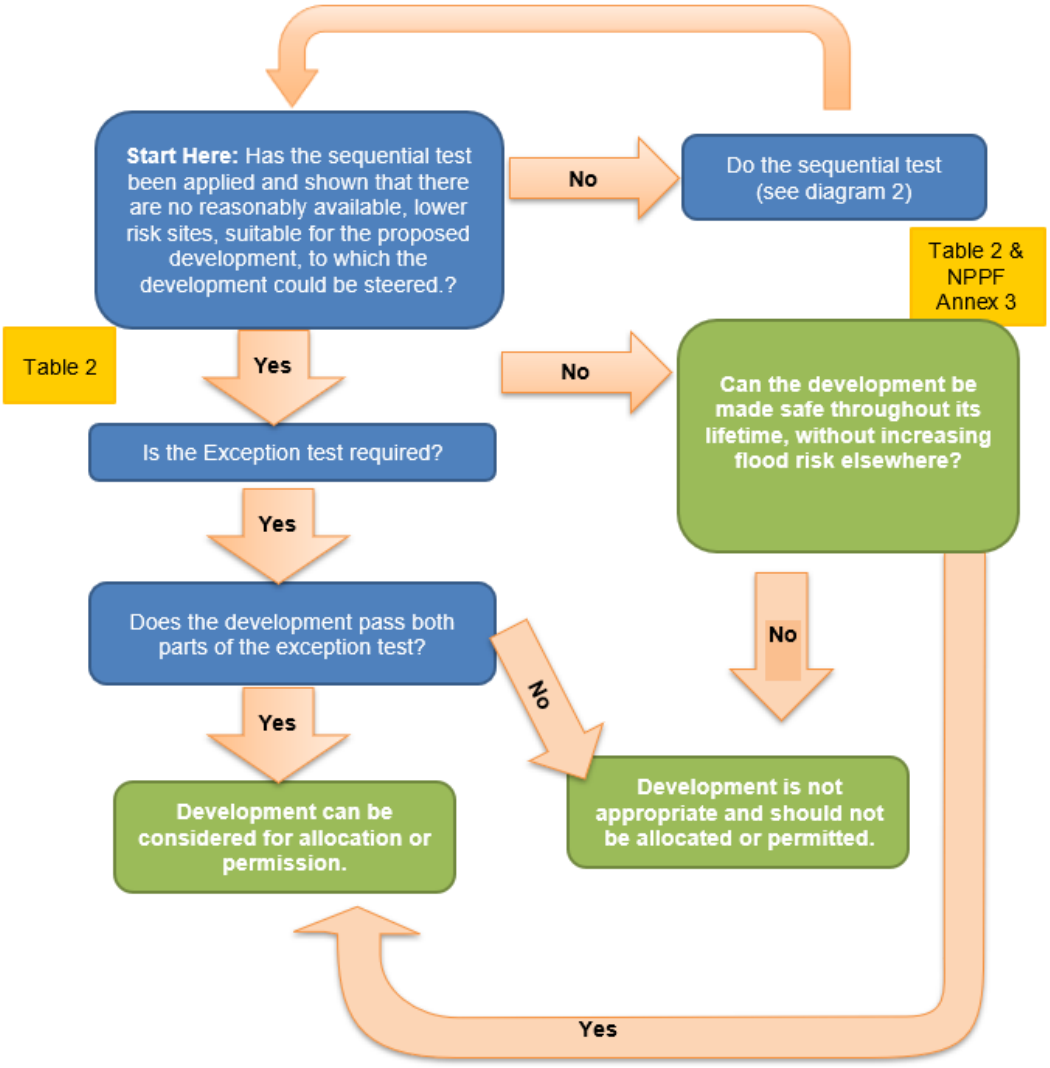
Table 1: NPPG Matrix of Flood Risk Vulnerability and Exception Tests

Flood Risk vulnerability classification	Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	✓	Exception Test required	✓	✓
Zone 3a	Exception Test required	✓	×	Exception Test required	✓
Zone 3b	Exception Test required	✓	×	×	×

2.11. The NPPG indicates that the exception test should only be applied as set out above and only if the sequential test has shown that there are no reasonably available, lower-risk sites, suitable for the proposed development, to which the development could be steered.

2.12. The application of the sequential test in plan-making is illustrated through National Planning Practice Guidance and is replicated at Figure 2.

Figure 2: Application of the Exception Test to plan preparation



New National Flood Risk Assessment (NaFRA2)

2.13. Recently the Environment Agency has published a range of new national risk information for flooding and coastal erosion, known as the new National Flood Risk Assessment. The new NaFRA2:

- Provides a single picture of current and future flood risk from rivers and the sea, and from surface water;
- Uses both existing detailed local information and improved national data;
- Includes the potential impact of climate change on flood risk, based on UK Climate Projections (UKCP18);

- Shows potential flood depths; and,
- Provides much higher resolution maps that make it easier to see where there is risk.

2.14. Numerous datasets and reports have been published between December 2024 – March 2025, including the following:

- 17th December 2024: A 'National assessment of flood and coastal erosion risk in England 2024' report, which summarises new NaFRA and National Coastal Erosion Risk Map (NCERM) data;
- 28th January 2025: New National Flood Risk Assessment (NaFRA) 'Risk of flooding from rivers and sea' and 'Risk of flooding from surface water' data and new National Coastal Erosion Risk Map (NCERM) data; and,
- 25th March 2025: New NaFRA2 'Flood zone' data on 'Flood map for planning' and available on data.gov.uk, enabling developers and planners to find the data they need to undertake flood risk assessments.

2.15. The approach taken by the Council to the consideration and use of NaFRA2 data in the SFRA process is set out in further detail in Section 3 below.

3. Strategic Flood Risk Assessment in Surrey Heath

What is a Strategic Flood Risk Assessment?

3.1. Strategic Flood Risk Assessment (SFRA) provides an overview of the risk of flooding from all sources in the planning authority area, at a strategic level. SFRA's can inform the development of strategic policies and provide information on flood risk to inform the sequential and exception tests required by national planning policy.

3.2. SFRA's are often undertaken in two parts. Level 1 SFRA's are very high-level, strategic documents and do not go into detail on a site-specific basis, but should be of sufficient detail to enable application of the sequential test and to inform the allocation of development to areas of lower flood risk.

3.3. A Level 2 SFRA characterises the detailed nature of flood risk from all sources, both now and in the future, and is required where land outside of flood risk areas cannot appropriately accommodate all necessary development. Level 2 SFRA's take a high level assessment of the flood risk associated with sites based on known details, such as development type and site capacity. A site specific Flood Risk Assessment can then fill in the details of the development and mitigation proposed within the parameters set by the Level 2 SFRA, at planning application stage.

Strategic Flood Risk Assessment 2015 - 2021

3.4. In 2014, the Council commissioned Capita to prepare a Strategic Flood Risk Assessment (SFRA) to underpin the development of a new Local Plan for the Borough. This version of the SFRA informed and influenced the earliest stages of the plan-making process.

3.5. The SFRA was subsequently updated by Capita in 2021. The SFRA 2021 identified sources of flooding as fluvial, excess surface water, groundwater or a possible breach of the Basingstoke Canal. In addition, the SFRA 2021 defined the extent of Flood Zone 3b for both the River Blackwater and the Addlestone Bourne. The SFRA 2021 informed the development of the Draft Surrey Heath Local Plan (2019-2038): Preferred Options Regulation 18 Consultation Version of the Local Plan, in addition to the Pre-Submission Surrey Heath Local Plan (2019-2038): Regulation 19 version and their supporting Sustainability Appraisals.

Strategic Flood Risk Assessment 2025

3.6. In Summer 2024, as part of ongoing discussions through the duty to co-operate, the Environment Agency indicated that the SFRA 2021 should be updated to take account of up-to-date climate change data and modelling prepared for the Addlestone Bourne, in addition to updated guidance on flood risk and coastal change in NPPG. Accordingly, the Council commissioned Jeremy Benn Associates (JBA) to prepare an updated Level 1 Strategic Flood Risk Assessment for the Borough.

3.7. The Level 1 Strategic Flood Risk Assessment was completed in mid-January 2025 and made use of the best available data at the time of publication. The Level 1 SFRA provided information in respect of flood risk from a range of sources and took account of updated modelling for climate change. Modelling for the Addlestone Bourne was not made available for the Council's use during the preparation of the Level 1 SFRA and accordingly Flood Zone 3a was used as a conservative proxy for Flood Zone 3b in areas outside of detailed model coverage, in agreement with the Environment Agency.

3.8. Through the Level 1 SFRA, 31 housing sites and 1 Gypsy and Traveller site which were identified as site allocations in the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) were taken through a screening exercise to help inform the application of the Sequential Test and to enable the Council to determine whether a Level 2 SFRA would be required.

3.9. The initial screening exercise identified a number of sites which should be considered in more detail through a Level 2 SFRA. Preparation of a Level 2 SFRA commenced in January 2025.

3.10. On the 28th January 2025, following the completion of the Level 1 SFRA, the Environment Agency published new data in respect of the risk of flooding from surface water. This data was used to inform the Level 2 SFRA and the sites initially screened at the time of the preparation of the Level 1 SFRA were screened again, against the updated NaFRA2 data.

3.11. Following this initial screening exercise, nine sites were initially identified as 'red' sites. These sites were identified as having obstacles or challenges for development which would need consideration if taken forward and which may need to be subject to the exception test to show that the site can be delivered safely. Subsequently four sites were removed from the 'red' sites list, either because the site concerned benefitted from an existing planning consent, or because the area of the site was refined to exclude the areas of highest flood risk. The five remaining 'red' sites, which were assessed in detail through the Level 2 SFRA were:

- Land off Spencer Close, Frimley Green;

- The Deans, Bridge Road, Camberley;
- Land East of Benner Lane, West End;
- Swift Lane Extension, Bagshot;
- The Grange, St Catherines Road, Frimley.

3.12. In respect of the 'red' sites, it is important to note that the SFRA did not identify flood risk as a barrier to the delivery of any of the sites in question.

3.13. Including three sites downgraded from 'red', 17 sites in total were identified as 'amber' sites. These sites were recognised as having a lower level of flood risk that is unlikely to prevent development, but that will need to be considered and planned for at the planning application stage.

3.14. The Level 2 SFRA was completed in March 2025. Together the Level 1 and Level 2 SFRA have informed this updated sequential and exceptions test.

NaFRA2 and the Surrey Heath SFRA

3.15. National-level data on flood risk is in a period of transition, as new datasets become available across early 2025. The status of the Level 1 and Level 2 SFRA's in respect of the use of NaFRA2 data is set out below:

- The Level 1 SFRA makes best use of the data available at the time of the publication of the assessment. The SFRA was published prior to the release of new national 'risk of flooding from rivers and sea', 'risk of flooding from surface water' and 'flood zone' data;
- The Level 2 SFRA makes use of the latest NaFRA2 'risk of flooding from rivers and sea' and 'surface water data', which was released in late January following the publication of the Level 1 SFRA. Notably, surface water data indicates surface water risk to have reduced across many of the sites in the Borough from the previous data. The Environment Agency indicated that NaFRA2 data in respect of flood zones would be made available to Local Planning Authorities through a limited release on 11th March 2025, however as a result of how the data release was managed, the Council was unable to access the data before the general release date of the 25th March 2025. As such it was not possible to take account of this data in the completion of the Level 2 SFRA.

4. Applying the Sequential and Exception Tests

Introduction

4.1. The Council has developed updated sequential and exception tests based on the evidence set out within the Level 1 and Level 2 SFRA's, completed in January and March 2025 respectively. The updated sequential and exception tests support the Surrey Heath Pre-Submission Local Plan (2019-2038): (Regulation 19) and supersede the interim sequential and exception tests, made available at the time of the Regulation 19 publication period.

Approach taken in the updated Sequential Test

4.2. The approach taken in the updated sequential test is directly informed by, and follows the general guidance set out in Appendix C of the Level 1 SFRA.

4.3. This sequential test is focused on the sites allocated for residential led development within the Surrey Heath Pre-Submission Local Plan (2019-2038): (Regulation 19). It seeks to establish whether the allocations in question remain appropriate, based on the updated Strategic Flood Risk Assessment. Given the stage at which the sequential test is being updated (the Council submitted the Local Plan to the Government for independent examination on 10 December 2024), it is considered reasonable to focus the sequential test upon the site allocations identified within the Local Plan. Sites not considered suitable for allocation within the Local Plan have been filtered out from consideration at earlier stage of the plan-making process[1].

Use of data in the sequential test

4.4. It is noted that national guidance indicates that all sources of flood risk and both current and future impacts of climate change should be taken into account in the completion of the sequential test.

[1] The Council's Strategic Land Availability Assessment (SLAA) methodology sets out that sites lying wholly within, or adversely constrained by, Flood Zone 3b (functional flood plain) are not suitable for development. Flood risk is also factored into SLAA process more generally, with flood risk taken into account when seeking to identify realistic site capacities. In the SLAA 2024, where possible based on site specific considerations, developable areas have been identified which exclude areas of high flood risk.

4.5. Notwithstanding this, Appendix C (Guide for using available flood risk data in applying the sequential test) of the Level 1 SFRA 2025 recommends that groundwater flood risk is not considered in the sequential test because available mapping does not provide competent evidence on the relative risk of flooding across the study area and could potentially result in inappropriate allocations if used without understanding the limitations of the data. This is also addressed in Section 3.6 of the Level 2 SFRA, which notes that data available for groundwater flooding is not directly comparable to other forms of flood risk and, as a result, not possible to categorise into areas of high, medium or low risk in isolation. Accordingly, whilst risk from groundwater flooding is referenced and discussed where relevant in the sequential test, it does not inform the sequencing of sites in itself.

4.6. In addition to the above, Appendix C of the Level 1 SFRA also indicates that risk of flooding from sewers, reservoirs and canal flooding should not used in the sequencing of sites through the sequential test, for the following reasons:

- Available information in respect of sewer flood risk is not of an appropriate resolution or format to support the spatial comparison of risk.
- Reservoir flood mapping data is inappropriate to be used alongside risk mapping from other sources when performing the sequential test.
- In respect of canal flooding, The probability of failure is not quantifiable as it is a residual risk.

4.7. As a result, the sequencing of sites within the sequential test is focused on risk from fluvial and surface water flooding, both now and in the future. Notwithstanding this, risk of flooding from other sources is noted in the sequential test where applicable and discussed further in Section 5.

Categorising and Sequencing Sites

4.8. The NPPF indicates that the purpose of the Sequential Test is to ensure that new development is steered towards areas with the lowest probability of flooding and ensure that development safely responds to the identified risk. In the first instance, development should be directed to areas with the lowest risk of flooding. If the sequential test shows that there are no reasonably available, lower risk sites suitable for residential use to which development can be steered, sites in areas of medium risk, and then higher risk, should be considered.

4.9. The Council's sequential test follows this approach, however it is recognised that it is not necessarily the case that sites will fall neatly into clear categories of 'low', 'medium' and 'high' flood risk. Rather, flood risk is likely to vary across sites, and different areas within sites may be affected to different degrees. As such, for the purposes of this sequential test, sites with the lowest risk of flooding are expected to meet one of the following criteria:

- The site should not be at risk of flooding from any source, either now or in the future; or,
- In line with guidance set out within Section 3 of Appendix C of the Level 1 SFRA, only a small proportion of the site is identified as being at high or medium risk of flooding such that the level of development proposed can be adequately accommodated within areas of the lowest flood risk and without increasing flood risk within the site or beyond its boundaries. Such sites will be identified through qualitative assessment.

4.10. Sites at medium risk of flooding will usually have larger areas at medium or higher risk of flooding. Such sites will be taken as those where development on areas at medium risk of flooding may not be avoidable (even if the site is predominantly at a low risk of flooding). Sites may also be considered to be at medium risk of flooding where the site includes an area at a higher risk of flooding, but the level of development proposed can be accommodated within areas of the medium and low flood risk (and without recourse to the areas identified as being at highest risk).

4.11. Outcomes of the sequential test are set out in tabular form, with sites sequenced on the basis of the percentages of the site affected by flood risk. Each site record details of the percentages of the site affected by fluvial and surface water flood risk[2] based on the data available to the Council at the time that the Study was undertaken. Site records also provide a summary of any further potential sources of flooding. A commentary is provided for each site, summarising the outcomes of the assessment.

4.12. The results of the sequential test are set out at Annex 2 and are summarised in Section 5 of this document.

[2] The percentage flood zones quoted show the percentage of the site at flood risk from that particular flood zone or event, including the percentage of the site at flood risk at a higher risk zone, e.g. Flood Zone 2 includes the Flood Zone 3 percentage. Flood Zone 1 is the remaining area outside Flood Zone 2 (Flood Zone 2 + Flood Zone 1 = 100%).

Methodology for the Exception Test

4.13. Where the application of the sequential test identified it was necessary, the exception test has been undertaken.

4.14. NPPG sets out the requirements for the exception test but does not reflect the need to avoid flood risk from sources other than rivers and the sea. There is no guidance on how to consider other sources of flood risk. In line with NPPG and the Level 2 SFRA, the exception test should only be applied, following the application of the sequential test, in the following instances:

- Essential infrastructure in Flood Zone 3a or 3b;
- Highly vulnerable development (including stationing of caravans) in Flood Zone 2;
- More vulnerable development (such as C3 and C2 residential uses) in Flood Zone 3a.

4.15. There are two parts to demonstrating that a site allocation passes the exception test. These are:

- Part A: Demonstrating that the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- Part B: Demonstrating that 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.

4.16. In considering whether a site satisfies Part A of the exception test, consideration will be given to relevant Local Plan evidence base documents, including the Sustainability Appraisal..

4.17. In respect of Part B, consideration will be given to the 'red' site assessments set out within the Level 2 SFRA, as these set out where the exception test should be undertaken, and where the exception test is not required.

4.18. If any affected site passes both parts of the exception test, the allocation remains justified. However if an affected site fails either part of the exception test, consideration should be given to removing the site allocation from the Local Plan.

4.19. The results of the exception test are set out at Annex 3 and are summarised in Section 5 of this document.

5. Summary of outcomes of the Sequential and Exceptions Tests

5.1. Results of the Sequential Test are set out at Annex 3. 32 sites are allocated for C3 residential, or residential-led development within the Local Plan. Of the sites allocated within the Plan, 31 are proposed to incorporate dwelling houses or residential institutions, which are identified in Annex 3 to the NPPF as 'more vulnerable' uses. 1 site is allocated in the Local Plan for Gypsy and Traveller provision; Caravans are identified in Annex 3 to the NPPF as being 'highly vulnerable' uses.

Summary of outcomes – more vulnerable uses

5.2. Of the 31 sites allocated for 'more vulnerable' C3 residential or residential-led development within the Local Plan, 21 sites were considered to fall within the lowest areas of flood risk. Of these, 3 sites were considered to have no identified risk of flooding; the remaining sites had some areas of medium or high flood risk, however the areas in question were considered to be very limited. In these cases it was determined that development could be adequately accommodated within areas of the lowest flood risk and without increasing flood risk within the site or beyond its boundaries.

5.3. 3 sites were identified as having a higher risk of flooding, but owing to site-specific circumstances were classed as 'lower risk' sites in the sequential test, in alignment with the sequential test methodology. These sites are:

- The Grange, St Catherines Road;
- Broadford, Castle Grove Road, Chobham; and,
- Land Adjacent Sherrard Way, Mytchett.

5.4. The Grange is identified as a 'red' site in the Level 2 SFRA, which indicates that the site will need to be subject to the exception test in the event that development cannot be located outside the areas of highest flood risk. Notwithstanding this, the capacity of the site is very limited at c.7 dwellings per hectare; at this density, it is considered that development can comfortably be accommodated outside areas of both medium and high fluvial flood risk. Accordingly, the site is classified as constituting a 'low risk' site.

5.5. In respect of Broadford, Castle Grove Road, Chobham and Land Adjacent Sherrard Way, Mytchett, the risk of flooding to both sites was considered through the SLAA process and led to the capacities of both site allocations in the Local Plan being adjusted downwards. Accordingly, whilst the sites are subject to extensive areas of (primarily) fluvial flood risk, the Council is satisfied that the level of development proposed at each site could be accommodated in areas of lowest risk of flooding from fluvial and surface water flooding, both now and in the future. Because development in medium/high areas of flood risk can be avoided at these sites, the sites have been considered as sequentially preferable to site locations where high or medium flood risk cannot be avoided.

5.6. It is recognised that a number of sites identified as being at the lowest risk of flooding were identified as 'amber' sites in the Level 2 SFRA, as a result of perceived risk of surface water and/or groundwater flooding. These were:

- Camberley Station, Station House (surface water & groundwater);
- Former Portesbery School (surface water & groundwater);
- St James House (surface water & groundwater);
- Camberley Centre, France Hill Drive (groundwater);
- Land at Loen, St Catherines Road (groundwater);
- Land Rear of 192-210 London Road (groundwater);
- Land North of Guildford Road (groundwater);
- 61-63 London Road (groundwater);
- Land adjacent Sherrard Way (groundwater); and,
- Broadford, Castle Grove Road (groundwater).

5.7. As set out in the sequential test and at Paragraph 5.2 above, the risk from surface water flooding identified at the affected sites was assessed in the sequential test to be minimal (in most cases affecting less than 5% of any given site). The SFRA notes that surface water flooding poses a minor risk to the sites in question. However, in line with the Level 2 SFRA, it is expected that these sites should be supported by a site-specific Flood Risk Assessment (FRA) at the planning stage; this should take particular consideration of the surface water flow routes/areas at risk and how these will impact the site itself as well as access and escape routes.

5.8. In respect of lower risk sites identified as 'amber' sites by reason of the risk of groundwater flooding in the SFRA, it is reiterated that following the recommendations set out in Appendix C of the Level 1 SFRA, groundwater flood risk was not considered in the sequential test. This is because available mapping does not provide competent evidence on the relative risk of flooding across the study area and could potentially result in inappropriate allocations if used without understanding the limitations of the data. Notwithstanding this, whilst groundwater would not be expected to pose a risk to the deliverability of affected sites, the Level 2 SFRA recommends that additional investigation work may be required for affected sites at planning application stage to support the detailed design of affected sites and their drainage systems.

5.9. There were no other reasonably available, lower risk sites aligned to the Council's preferred spatial strategy suitable for C3 residential development classed as 'more vulnerable'. Accordingly, consideration was given as to whether development could be allocated in areas of medium flood risk, both now and in the future.

5.10. Of the remaining 10 sites, 9 sites were considered to fall within areas of medium flood risk. In all cases, flood risk was considered to arise from surface water flooding, rather than fluvial flooding. All sites identified as being at medium risk of flooding were identified in the Level 2 SFRA as either 'amber' or 'red' sites:

- Land off Spencer Close (red site – surface water and groundwater);
- Land East of Benner Lane (red site – surface water);
- 280 Gordon Avenue (amber site – surface water and groundwater);
- Land East of Knoll Road (amber site – surface water and groundwater);
- Sir William Siemens Square (amber site - surface water and groundwater);
- St Margarets Cottage and the Ferns (amber site – surface water);
- Pinehurst (amber site – surface water and groundwater);
- London Road Block (amber site – surface water and groundwater)
- Land at Chamness, Woodlands Lane (amber site – surface water).

5.11. It is considered that these sites remain suitable for allocation in the Local Plan, but will need to be supported by an adequate, site-specific FRA at the planning stage. In the case of both Land off Spencer Close and Land East of Benner Lane, particular regard should be had to the detailed assessments set out in the Level 2 SFRA.

5.12. One site was considered to fall within an area of high flood risk – The Deans, Bridge Road, Bagshot. Just over half of the site is identified as being at medium risk of fluvial flooding, and it was noted that in a climate change scenario the risk of fluvial flooding may increase.

5.13. In addition, the assessment of the site set out within the Level 2 SFRA expresses concerns that the level of fluvial flood risk associated with the site may be underestimated. It indicates:

The Addlestone Bourne model shows the 1% AEP extent (Flood Zone 3) encroaches on the site, however, this model extent is not shown to be representative of the underlying topography and the EA RoFfRS extent shows the site is only impacted by Flood Zone 2. However… there are concerns of the current representation of the site within the EA LiDAR. The fluvial flood risk to the site should be reviewed as part of a site-specific FRA. Should Flood Zone 3a be shown to impact the site and 'More Vulnerable' development be proposed within the extent of Flood Zone 3a, the exception test will be required for this site. 'More Vulnerable' development will not be permitted in any areas of the site that lie within Flood Zone 3b.

5.14. Given the potential climate change impacts associated with the site and uncertainty regarding the level of flood risk associated with the site, the site was taken through an exception test. It should be noted that the site was also taken through the exception test in the Interim Sequential and Exception Tests. This was because at the time that the interim Sequential and Exception Tests were undertaken, the site was shown to have areas of Flood Zone 3.

5.15. The updated exception test for the site noted that there were wider sustainability benefits arising from the provision of the site which was considered to outweigh flood risk. Taking account of the detailed assessment and recommendations of the Level 2 SFRA, it was also considered that the site could be made safe for its lifetime, taking account of the vulnerability of the site users, and without increasing flood risk elsewhere (subject to appropriate site design and detailed FRA at planning application stage). As a result the site was deemed to have passed both part A and part B of the exception test.

Summary of outcomes – highly vulnerable uses

5.16. One site – Swift Lane Extension, Bagshot – is proposed to be used for Gypsy and Traveller provision (5 pitches). Siting of caravans is identified in Annex 3 to the NPPF as a 'highly vulnerable' use. The exception test is required for highly vulnerable uses falling within Flood Zone 2.

5.17. The Council has an identified need for at least 35 pitches for Gypsies and Travellers meeting the planning definition across the plan period. The Council also has an identified need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that did not meet the planning definition (please refer to the Surrey Heath Gypsy and Traveller Accommodation Assessment 2020, to be read in conjunction with the supporting letter from ORS (March 2024).

5.18. The Council has undertaken an exhaustive portfolio of work to seek to identify sites through which it's identified needs for Gypsies and Travellers can be met, however it has been challenging to identify suitable, available sites and accordingly, Swift Lane Extension is currently the only site allocation for Gypsy and Traveller provision identified in the Local Plan.

5.19. The sequential test identifies that the majority of the site is at low risk of fluvial flooding both now and in the future, however the northernmost part of the site is at medium/high risk of fluvial flooding. Much of the site is currently at low risk of surface water flooding, however there are some areas at medium/high risk of surface water flooding in the site and risk of surface water flooding may increase in a climate change scenario.

5.20. Notwithstanding the above, it is recognised that the Environment Agency's historic flooding and recorded flood outline datasets show that in September 1968, the Windle Brook exceeded its capacity and overtopped. It is also recognised that until the release of the Environment Agency's Risk of Flooding from Rivers and Sea (RoFfRS) dataset, the site was identified as falling almost entirely in Flood Zone 2. Taking account of the history of the site, the presence of small areas of Flood Zone 2/3a/Indicative Flood Zone 3b (based on the aforementioned dataset) and the highly vulnerable nature of the use, the Council considers that the site should be taken through the exception test accordingly. This aligns with the approach taken in the Interim Sequential and Exception Tests.

5.21. The exception test noted that there were wider sustainability benefits arising from the provision of the site which were considered to outweigh flood risk. Taking account of the detailed assessment and recommendations of the Level 2 SFRA, it was also considered that the site could be made safe for its lifetime taking account of the vulnerability of site users, and without increasing flood risk elsewhere (subject to appropriate site design and detailed Flood Risk Assessment at planning application stage). As a result the site was deemed to have passed both part A and part B of the exception test.

Conclusions

5.22. It is considered that all relevant site allocations within the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) pass the sequential test and where appropriate, fulfil the requirements of the exception test.

Annex 1: Flood Risk Vulnerability Classifications

5.23. The NPPG classifies flood risk vulnerability of land uses into five categories, as follows:

Essential Infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk;
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood; and,
- Wind turbines.

Highly vulnerable

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

More vulnerable

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

Less vulnerable

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

Water-compatible development

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

Annex 2: Results of Sequential Test

Residential (C3) Flood Risk Vulnerability Classification: More Vulnerable Uses

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/14	Burwood House Hotel, 15 London Road, Camberley	0.16	10 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 0% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding. No increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of flooding from all sources, both now and in the future. Accordingly, the sequential test is passed.
HA1/15	439-445 London Road, Camberley	0.1	15 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 0% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding. No increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of flooding from all sources, both now and in the future. Accordingly, the sequential test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/12	317-319 Guildford Road, Bisley	0.31	17 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 0% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of flooding from all sources, both now and in the future. Accordingly, the sequential test is passed.
HA1/27	Land at Loen, St Catherines Road, Deepcut	4.34	Care Home (C2) 60 (C3) equivalent units	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 0% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding.	Groundwater: 65% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding and surface water flooding both now and in the future. Accordingly, the sequential test is passed. Two thirds of the site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is assessed within the Level 2 SFRA and consideration should be given to the risk of groundwater flooding at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/10	Land Rear of 192-210 London Road, Bagshot	1.27	20 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 0% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding. No increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding and surface water flooding both now and in the future. Accordingly, the sequential test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is assessed within the Level 2 SFRA and consideration should be given to the risk of groundwater flooding at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/02	Camberley Centre, France Hill Drive, Camberley	0.87	35 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: <1% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The site is currently at low risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly, however it is anticipated that the increase would be minimal. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/09	Former Portesbery School, Portesbery Road, Camberley	1.07	36 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 1% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The site is currently at low risk of surface water flooding, however in a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/16	Land Rear of 1 – 47 Sullivan Road, Camberley	0.19	10 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 1% 1 AEP: <1% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed.
HA1/19	Former Premier Site, Newfoundland Road, Deepcut	0.37	13 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 1% 1 AEP: <1% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/06	Chobham Rugby Club, Windsor Road	3.47	91 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 1% 1 AEP: <1% 3.3 AEP: <1%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels within 0.025m of surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/04	Yorktown Car Park, Sullivan Road, Camberley	0.53	27 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 2% 1 AEP: 1% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed.
HA1/01	Bagshot Depot and Archaeology Centre, Bagshot	0.98	50 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 2% 1 AEP: <1% 3.3 AEP: <1%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/28	61 – 63 London Road, Camberley	0.32	Care Home (C2) 32 (C3) equivalent units	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 3% 1 AEP: 1% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a small area at medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/21	103-109 Guildford Road, Lightwater	0.38	21 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 4% 1 AEP: 3% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/03	Camberley Station, Station House, Pembroke Broadway, Camberley	0.41	150 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 4% 1 AEP: 2% 3.3 AEP: <1%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/07	St James House, Knoll Road, Camberley	0.15	30 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 5% 1 AEP: 0% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The site is currently at low risk of surface water flooding, however in a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA4	Mindenhurst, Deepcut	111.8	1200 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 5% 1 AEP: 2% 3.3 AEP: 1%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: <1% of site has expected groundwater levels within 0.025m of surface. 48% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: Yes.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding the above, the suitability of the site from a flood risk perspective has been robustly assessed through the planning application process and has been concluded to be acceptable. Accordingly, the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/18	Land North of Guildford Road, Deepcut	5.54	21 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 6% 1 AEP: 3% 3.3 AEP: 2%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 91% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase slightly. The Council is satisfied that the areas at risk of surface water flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/20	The Grange, St Catherines Road, Deepcut	2.91	17 Residential units (C3)	2: 8% 3a: 3% Indicative 3b: 2%	0.1 AEP: 0% 1 AEP: 0% 3.3 AEP: 0%	Taking account of the 0.1% AEP fluvial flooding extent the implications of climate change may result in an increase in risk of flooding from rivers. No increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The majority of the site is currently at low risk of fluvial flooding, with a small area to the south of the site at medium/high risk of surface water flooding. In a climate change scenario, risk of fluvial flooding may increase slightly. The site is at low risk of surface water flooding both now and in the future. The Council is satisfied that the areas at risk of fluvial flooding (both now and in a climate change scenario) are very limited and development can be delivered in areas of the site that are at the lowest risk of flooding in the long term. Accordingly, the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/17	Broadford, Castle Grove Road, Chobham	2.25	15 Residential units (C3)	2: 40% 3a: 34% Indicative 3b: 31%	0.1 AEP: 5% 1 AEP: 3% 3.3 AEP: 2%	Taking account of the 0.1% AEP fluvial flooding extent the implications of climate change may result in an increase in risk of flooding from rivers. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels within 0.025m of surface. Reservoir Flooding: No identified risk. Historic Flood Map: 34% Within 100m of detailed river network: Yes.	Just under half of the site is currently at medium/high risk of fluvial flooding. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of fluvial flooding is anticipated to increase and risk of surface water flooding may increase slightly. The Council is satisfied that whilst there are extensive areas at medium/high risk of flooding within the site, the low level of development proposed can be accommodated in areas of at the lowest risk of flooding from fluvial and surface water flooding both now and in the future. Because development in medium/high areas of flood risk can be avoided, the site is considered preferable to site locations where high or medium flood risk cannot be avoided and accordingly, the sequential test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater flooding is considered within the Level 2 SFRA and the risk of groundwater flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/22	Land Adjacent to Sherrard Way, Mytchett	4.4	16 Residential units (C3)	2: 72% 3a: 68% Indicative 3b: 68%	0.1 AEP: 6% 1 AEP: 2% 3.3 AEP: 1%	Taking account of the 0.1% AEP fluvial flooding extent the implications of climate change may result in an increase in risk of flooding from rivers. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 68% of site has expected groundwater levels within 0.025m of surface. Reservoir Flooding: 50% of site has expected risk of flooding from reservoirs during dry day event and 84% risk of flooding from reservoirs during wet day event. Historic Flood Map: 0 Within 100m of detailed river network: Yes.	Nearly three quarters of the site is currently at medium/high risk of fluvial flooding. Nearly all of the site is currently at low risk of surface water flooding, with a very small area at medium/high risk of surface water flooding. In a climate change scenario, risk of fluvial flooding is anticipated to increase and risk of surface water flooding may increase slightly. The Council is satisfied that whilst there are extensive areas at medium/high risk of flooding within the site, the low level of development proposed can be accommodated in areas of at the lowest risk of flooding from fluvial and surface water flooding both now and in the future. Because development in medium/high areas of flood risk can be avoided, the site is considered preferable to site locations where high or medium flood risk cannot be avoided and accordingly, the sequential test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Likewise, risk of reservoir flooding has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater and other sources of flooding is considered within the Level 2 SFRA and other sources of flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
Sites considered to be at medium risk of flooding:								
HA1/13	280 Gordon Avenue, Camberley	0.22	15 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 31% 1 AEP: 1% 3.3 AEP: 0%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels within 0.025 of surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The site is currently at low/medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. Taking account of the size and characteristics of the site, the Council is satisfied that development can be delivered in a manner that makes the development safe throughout its lifetime without increasing flood risk elsewhere through the use of SUDS and appropriate site design as relevant. Accordingly the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater and other sources of flooding is considered within the Level 2 SFRA and other sources of flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/08	Land off Spencer Close, Frimley Green	1.47	60 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 19% 1 AEP: 1% 3.3 AEP: <1%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 28% of site has expected groundwater levels within 0.025m of surface. 50% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: Yes.	The site is at low risk of fluvial flooding both now and in the future. The site is currently at low/medium risk of surface water flooding. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. The site is identified as a 'red' site in the Level 2 SFRA, owing to the specific characteristics of surface water flooding affecting the site. Notwithstanding this, taking into account the assessment undertaken in the Level 2 SFRA, the Council is satisfied that development can be delivered in an appropriate manner. A detailed site-specific FRA should be submitted at planning application stage that takes account of the recommendations set out within the Level 2 SFRA. The Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater and other sources of flooding is considered within the Level 2 SFRA and other sources of flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA3	Land East of Knoll Road, Camberley	1.36	340 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 15% 1 AEP: 4% 3.3 AEP: 2%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The site is currently at low/medium risk of surface water flooding, however there are some limited areas at high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. Taking account of the size and characteristics of the site, the Council is satisfied that development can be delivered in a manner that makes the development safe throughout its lifetime without increasing flood risk elsewhere through the use of SUDS and appropriate site design as relevant. Accordingly the Sequential Test is passed. The site has a risk of groundwater flooding to surface and subsurface assets, however current available mapping does not provide competent evidence in respect of the relative risk of groundwater. As such this has not been factored into the sequencing of sites. Notwithstanding this, risk of groundwater and other sources of flooding is considered within the Level 2 SFRA and other sources of flooding should be assessed at planning application stage, with development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/05	Sir William Siemens Square, Chobham Road, Frimley	3.09	170 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 20% 1 AEP: 7% 3.3 AEP: 4%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 8% of site has expected groundwater levels within 0.025m of surface. 92% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: Yes.	The site is at low risk of fluvial flooding both now and in the future. The majority of the site is currently at low/medium risk of surface water flooding, however there are some areas at high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. The site has a risk of groundwater flooding to surface and subsurface assets, although this has not been factored into the sequencing of sites. Notwithstanding the above it is noted that Planning Permission was granted for the site under reference 24/0116 on 9th August 2024 . Flood risk was assessed through the determination of the planning application, which was supported by a detailed site-specific Flood Risk Assessment and Drainage Strategy. The Lead Local Flood Authority considered the submitted information and raised no objections subject to the provision of SuDS. Accordingly the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/23	St Margarets Cottage and The Ferns, Woodlands Lane, Windlesham	0.94	16 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 12% 1 AEP: 7% 3.3 AEP: 6%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The majority of the site is currently at low risk of surface water flooding, however there are some areas at medium/high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. Taking account of the size and characteristics of the site, the Council is satisfied that development can be delivered in a manner that makes the development safe throughout its lifetime without increasing flood risk elsewhere, through the use of SUDS and appropriate site design as relevant. Accordingly the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/26	Pinehurst, 141 Park Road, Camberley	0.79	Care Home (C2) 32 (C3) equivalent units	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 18% 1 AEP: 10% 3.3 AEP: 7%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The majority of the site is currently at low/medium risk of surface water flooding, however there are some areas at high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. The site has a risk of groundwater flooding to both surface and subsurface assets, although this has not been factored into the sequencing of sites. Notwithstanding the above it is noted that Outline Planning Permission was granted for the site under reference SU/23/0326/PCM on 9th January 2025. Flood risk was assessed through the planning application process and it was concluded that flood risk from surface water flooding could be adequately managed through detailed design. Accordingly the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA2	London Road Block, Camberley	1.88	550 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 18% 1 AEP: 11% 3.3 AEP: 8%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: 100% of site has expected groundwater levels between 0.025 and 0.5m below surface. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The majority of the site is currently at low/medium risk of surface water flooding, however there are some areas at high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. Taking account of the size and characteristics of the site, the Council is satisfied that development can be delivered in a manner that makes the development safe throughout its lifetime without increasing flood risk elsewhere, through the use of SUDS and appropriate site design as relevant. Accordingly the Sequential Test is passed. The site has a risk of groundwater flooding to both surface and subsurface assets. Risk of groundwater flooding is not explicitly considered through the Sequential Test as current available mapping does not provide the confidence or certainty required to undertake the Sequential Test. Consideration should be given to the risk of groundwater flooding at planning application stage and development designed and sited appropriately.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/24	Land East of Benner Lane, West End	1.07	16 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 22% 1 AEP: 12% 3.3 AEP: 8%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The majority of the site is currently at low/medium risk of surface water flooding, however there are some areas at high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. The site is identified as a 'red' site in the Level 2 SFRA, owing to the specific characteristics of surface water flooding affecting the site. Notwithstanding this, taking into account the assessment undertaken in the Level 2 SFRA, the Council is satisfied that development can be delivered in an appropriate manner. A detailed site-specific FRA should be submitted at planning application stage that takes account of the recommendations set out within the Level 2 SFRA. The Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
HA1/25	Land at Chamness, Woodlands Lane, Windlesham	0.75	20 Residential units (C3)	2: 0% 3a: 0% Indicative 3b: 0%	0.1 AEP: 17% 1 AEP: 12% 3.3 AEP: 11%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: No identified risk. Historic Flood Map: 0 Within 100m of detailed river network: No.	The site is at low risk of fluvial flooding both now and in the future. The majority of the site is currently at low/medium risk of surface water flooding, however there are some areas at high risk of surface water flooding in the site. In a climate change scenario, risk of surface water flooding may increase. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. Taking account of the size and characteristics of the site, the Council is satisfied that development can be delivered in a manner that makes the development safe throughout its lifetime without increasing flood risk elsewhere, through the use of SUDS and appropriate site design as relevant. Accordingly the Sequential Test is passed.

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
Sites considered to be at higher risk of flooding								
HA1/11	The Deans, Bridge Road, Bagshot	0.15	20 Residential units (C3)	2: 53% 3a: 0% Indicative 3b: 0%	0.1 AEP: 7% 1 AEP: 0% 3.3 AEP: 0%	Taking account of the 0.1% AEP fluvial flooding extent the implications of climate change may result in an increase in risk of flooding from rivers. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: 81% risk of flooding from reservoirs during dry day event. Historic Flood Map: 0 Within 100m of detailed river network: Yes.	Just over half of the site is identified as being at medium risk of fluvial flooding. In a climate change scenario the risk of fluvial flooding may increase. As set out in the Level 2 SFRA, there are concerns that flood risk associated with the site may be underestimated. The site is at low risk of surface water flooding, both now and in the future. There are no reasonably available lower risk sites suitable for the proposed development to which development can be steered, as all lower risk sites have already been identified as site allocations within the Local Plan or are not available/suitable for development. Notwithstanding this, given the level of flood risk associated with the site, potential impacts of climate change and concerns in respect to the accuracy of flood risk data, it is considered that the site should be subject to the exception test.

Residential (C3) Flood Risk Vulnerability Classification: Highly Vulnerable Uses

Site ID	Site Name & Location	Site Size (ha)	Proposed use & capacity	Distribution of site across flood zones (1, 2, 3a, Indicative 3b)	Distribution of site across areas at risk of flooding from surface water	Climate Change	Flood Risk from other Sources	Commentary
H12/01	Swift Lane Extension, Bagshot	1.2	5 Gypsy & Traveller Pitches (C3)	2: 2% 3a: 1% Indicative 3b: 1%	0.1 AEP: 16% 1 AEP: 8% 3.3 AEP: 5%	No increase in risk of fluvial flooding. Taking account of the 0.1% AEP surface water extent the implications of climate change may result in a minor increase in risk of flooding from surface water.	Groundwater: No identified risk. Reservoir Flooding: 1% of site has expected risk of flooding from reservoirs during dry day event. Historic Flood Map: 100% Within 100m of detailed river network: Yes.	The majority of the site is identified as being at low risk of fluvial flooding both now and in the future, however the northernmost part of the site is at medium/high risk of fluvial flooding. Much of the site is currently at low risk of surface water flooding, however there are some areas at medium/high risk of surface water flooding in the site and risk of surface water flooding may increase in a climate change scenario. The Council has an identified need for at least 35 pitches for Gypsies and Travellers meeting the planning definition across the plan period. The Council also has an identified need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that did not meet the planning definition (please refer to the Surrey Heath Gypsy and Traveller Accommodation Assessment 2020, to be read in conjunction with the supporting letter from ORS (March 2024). The Council has undertaken an exhaustive portfolio of work to seek to identify sites through which it's identified needs for Gypsies and Travellers can be met, however it has been challenging to identify suitable, available sites and accordingly, Swift Lane Extension is currently the only site allocation identified in the Local Plan. No other suitable and available sites have been identified that are considered to be at a lower risk of flooding. Taking account of the history of the site, the presence of small areas of Flood Zone 2/3a/Indicative Flood Zone 3b and the highly vulnerable nature of the use, the Council considers that the site should be treated as being at high risk of flooding and should be taken through the exception

								test accordingly. This aligns with the approach taken in the Interim Sequential and Exception Tests.

Annex 3: Results of the Exception Test

5.24. Even if 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. The table below details the exceptions test for those affected sites.

The Deans, Bridge Road, Bagshot

5.25. The Deans, Bridge Road, Bagshot is a 0.16ha site situated in central Bagshot and is bound to the north by the Windle Brook. The site is allocated for 20 net units within the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19).

5.26. Just over half of the site is identified as being at medium risk of fluvial flooding, and in a climate change scenario the risk of fluvial flooding may increase. The site is also subject to surface water flooding and is at reservoir flood risk. More vulnerable development, such as C3 residential development, is permitted in Flood Zone 2 without needing to be subject to the exceptions test, however the assessment of the site set out within the Level 2 SFRA expresses concerns that the level of fluvial flood risk associated with the site may be underestimated. It indicates:

The Addlestone Bourne model shows the 1% AEP extent (Flood Zone 3) encroaches on the site, however, this model extent is not shown to be representative of the underlying topography and the EA RoFfRS extent shows the site is only impacted by Flood Zone 2. However… there are concerns of the current representation of the site within the EA LiDAR. The fluvial flood risk to the site should be reviewed as part of a site-specific FRA. Should Flood Zone 3a be shown to impact the site and 'More Vulnerable' development be proposed within the extent of Flood Zone 3a, the exception test will be required for this site. 'More Vulnerable' development will not be permitted in any areas of the site that lie within Flood Zone 3b.

5.27. Given potential climate change impacts and the uncertainty regarding the level of flood risk associated with the site, the site has been taken through an exception test.

Part A: Wider sustainability benefits

5.28. The Local Housing Need calculation for Surrey Heath is set out in the Strategic Land Availability Assessment (2023) (the SLAA). The Local Housing Need figure for Surrey Heath is 321 homes per year. Over the plan period (2019-2038), this totals 6,111 new homes.

5.29. Identifying suitable sites through which the Council's identified needs for housing can be met is challenging, taking account the heavily constrained nature of the Borough. Of note, 23% of the Borough falls within the Thames Basin Heaths Special Protection Area (TBH SPA), with a further 19% of land falling within the 400m buffer zone that surrounds the SPA. Within these areas, no new residential development is permitted.

5.30. In view of the high level of identified needs and the challenges faced by the Borough in respect of land availability, the Council has undertaken a significant portfolio of work to identify suitable sites through which its housing needs can be met. The Council has also engaged with its neighbouring authorities under the duty to co-operate to establish whether they are in the position to assist the Council with meeting any unmet needs arising from the Borough. This resulted in Hart District Council agreeing to accommodate 41 dwellings per annum of unmet need arising in Surrey Heath to 2032. Nevertheless, the Council has needed to take a robust approach to the identification of sites, particularly those lying in sustainable locations, such as The Deans, which is situated central to Bagshot, within easy reach of a range of local services.

5.31. Taken cumulatively, the wider sustainability benefits to the community arising from the provision of housing and access to services are considered to outweigh the flood risk concerns arising from the site.

Part B: Can the site be made safe for its lifetime?

5.32. The Level 2 SFRA indicates that there are means to make the site safe for its lifetime without increasing flood risk elsewhere. The Level 2 SFRA provides the following guidance for site design and making the site safe:

- Detailed hydraulic modelling should be undertaken as part of a site-specific FRA, including a topographic survey of the site, to refine the fluvial flood risk to the site.
- Finished Floor Levels should be raised above the expected height of flooding in line with the EA's guidance and any raising of ground levels should ensure that flood risk is not increased elsewhere. The site should be designed so that the more vulnerable parts of the development are steered outside of the areas of fluvial flood risk.
- Safe access and escape routes should be demonstrated in the 1% AEP plus climate change fluvial and surface water events, taking consideration of the dry island which forms in the west of the site during the 0.1% AEP fluvial event. Currently this Level 2 assessment suggests that safe access and escape are likely to be maintained, however, further assessment of the fluvial risk to the site should be undertaken as part of a site-specific FRA, including an assessment of velocity and hazard.
- A carefully considered and integrated flood resilient and sustainable drainage design should be put forward, including a site-specific Surface Water Drainage Strategy, and SuDS maintenance and management plan and supported by detailed modelling.

- Flood mitigation measures should be implemented then tested to check that they will not displace water elsewhere (for example, if land is raised to permit development in one area, compensatory flood storage will be required in another).
- The residual risk of reservoir flooding at the site will need to be considered further at the site-specific Flood Risk Assessment (FRA) stage. An emergency plan may be required, demonstrating that the residual risks to the site can be safely managed and that appropriate evacuation plans are in place.

Conclusion

5.33. The Council considers that in line with the recommendations of the Level 2 SFRA, the site can be made safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere. As such, the site is deemed to have passed both part A and B of the Exception Test.

Swift Lane Extension, Bagshot

5.34. Swift Lane Extension, Bagshot is a 0.23ha site situated to the east of Bagshot; the site is bound to the north by the Windle Brook. The site is allocated for 5 Gypsy and Traveller pitches within the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19).

5.35. The sequential test identifies that the majority of the site is at low risk of fluvial flooding both now and in the future, however the northernmost part of the site is at medium/high risk of fluvial flooding. Much of the site is currently at low risk of surface water flooding, however there are some areas at medium/high risk of surface water flooding in the site and risk of surface water flooding may increase in a climate change scenario.

5.36. Notwithstanding the above, it is recognised that the EA's historic flooding and recorded flood outline datasets show that in September 1968 Windle Brook exceeded its capacity and overtopped. It is also recognised that until the release of the Environment Agency's Risk of Flooding from Rivers and Sea (RoFfRS) dataset, the site was identified as falling almost entirely in Flood Zone 2. Taking account of the history of the site, the presence of small areas of Flood Zone 2/3a/Indicative Flood Zone 3b and the highly vulnerable nature of the use, the Council considers that the site should be taken through the exception test. This aligns with the approach taken in the Interim Sequential and Exception Tests.

Part A: Wider sustainability benefits

5.37. The Council has an identified a need for at least 35 pitches for Gypsies and Travellers meeting the planning definition across the plan period. The Council also has an identified need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that did not meet the planning definition.

5.38. In view of the acute level of needs identified, the Council has taken an exhaustive approach to the identification of potential Gypsy and Traveller and Travelling Showpeople sites, including review of over 100 sites across the Borough. Despite this, environmental and land availability constraints have made it challenging to identify suitable, available sites to meet the Council's identified needs. Four sites were consulted on across the Regulation 18 stage of the plan-making process, however of these, only Swift Lane Extension, Bagshot has subsequently been identified as deliverable.

5.39. The allocation would enable a 5-pitch extension to an existing, overcrowded site and would assist in meeting some of the needs arising from the site. Failure to provide pitches in this location could lead to increased unauthorised encampments with poor accessibility to services.

5.40. A Transport Appraisal completed to inform the Council's wider considerations of site suitability indicated the site to fall within a sustainable, edge of settlement location, close to a range of local services in Bagshot. The development would also enable improvement to be made to the existing site including the re-establishment of an appropriate buffer from the Windlebrook, which adjoins the site to the north.

5.41. Taken cumulatively, the wider sustainability benefits to the Gypsy and Traveller community arising from the site are considered to outweigh flood risk.

Part B: Can the site be made safe for its lifetime?

5.42. The Level 2 SFRA indicates that there are means to make the site safe for its lifetime without increasing flood risk elsewhere. The Level 2 SFRA provides the following guidance for site design and making the site safe:

- Development should be steered outside of the areas at risk of surface water along the southeastern boundary. Development should also be steered away from the fluvial flood risk along the northern boundary, by Windle Brook. Developers should consider utilising these areas as a green corridor or as a location for SuDS.
- Further assessment of the risk to the site should be undertaken within a site specific FRA to refine the fluvial flood risk to the site. This site-specific FRA should either show that the site is not at fluvial risk or that the exception test can be passed.

- A site-specific FRA should also investigate the mechanism of the historic flood event in September 1968 and whether there have been changes to the site since this event. This is necessary to identify whether a similar event could occur in future, or if there are any mitigating factors that suggest the site is no longer at risk.
- The risk of surface water ponding in the site should be further assessed within a site-specific FRA. Finished Floor Levels should be raised above the expected height of flooding in line with the EA's guidance and any raising of ground levels should ensure that flood risk is not increased elsewhere.
- Safe access and escape should be demonstrated in the 1% AEP plus climate change fluvial and surface water events. This Level 2 assessment has shown that safe access and escape may be impeded by the surface water ponding along the access road, however, further assessment of this risk should be undertaken within a site-specific FRA, to include consideration of the velocity and hazard of the risk.
- A carefully considered and integrated flood resilient and sustainable drainage design should be put forward, including a site-specific Surface Water Drainage Strategy, and SuDS maintenance and management plan and supported by detailed modelling.

5.43. The size of the site would, together with wider opportunities to undertake a comprehensive re-design of the wider site, enable more flexibility in site layout and could enable new accommodation on the site to be steered away from areas of highest risk. Policy H12 of the Local Plan recognises the need to upgrade the access serving the site from a highways perspective and it is recognised that this could also provide opportunities to address surface water flood risk in the same vicinity. Further design features will assist in making the site safe for its lifetime. Such measures could include:

- Ensuring that the finished floor levels of the amenity buildings are raised above the surrounding ground level and the tethering of mobile homes;
- Ensuring that the electrical supply and switchboard within the amenity blocks are elevated above the flood level;
- Implementation of a Flood Warning and Evacuation Plan.

Conclusion

5.44. The Council considers that subject to appropriate design, the site can be made safe for its lifetime taking account of the vulnerability of its users and without increasing flood risk elsewhere. As such, the site is deemed to have passed both part A and B of the Exception Test.