



# **Sequential and Exception Tests for Housing Site Options**

Review 2026

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## Introduction

This sequential and exceptions test paper was prepared in relation to the selection of sites for inclusion in the emerging Castle Point Plan. This paper reviews the requirements of sequential and exceptions test and ensures that the site selection process remains in line with national policy regarding development and flood risk.

### ***National Policy Context***

The National Planning Policy Framework (NPPF) requires local planning authorities to take account of the risk of flooding when preparing their local plans. The NPPF sets out a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property, and to manage any residual risk. It is expected that the impacts of climate change are taken into account when considering flood risk.

In order to direct development, where possible, away from areas at highest risk of flooding, the NPPF requires local planning authorities to carry out a 'sequential test' when preparing their local plans. National planning guidance contains information on the application of the sequential test including information on the different 'flood risk zones' and the types of development normally appropriate in each having regard to the vulnerability of future users.

The NPPF recognises that following the application of the sequential test, it is not always possible, consistent with wider objectives, for certain development proposals/requirements to be located in lower 'flood risk zones'. It therefore also sets out a test that needs to be passed if certain types of development are to be exceptionally allocated in a local plan, or otherwise permitted. This is known as the Exception Test and comprises two elements:

- 1) It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk;
- 2) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

National planning guidance details when it is required when applying the Exception Test.

### ***Local Policy Context***

The Thames Estuary 2100 Plan sets out specific policies in relation to the management of flood risk in and around the Thames Estuary. Whilst applying the general policy of directing development away from areas at higher risk of flooding, it recognises that there are some areas around the Thames Estuary that are already substantially developed, and may require additional development to occur in the future in order to support the creation of sustainable communities. Where substantial communities do exist, the Thames Estuary 2100 Plan sets

out a policy of maintaining and enhancing the existing defences in order to respond to the implications of climate change. This policy applies on Canvey Island. It does not however apply to the undeveloped area south of Hadleigh.

### ***Evidence Base***

The NPPF expects local authorities to prepare Strategic Flood Risk Assessments in areas where there is likely to be a risk of flooding. Due to Castle Point's coastal location, it is appropriate for a Strategic Flood Risk Assessment to form part of the Castle Point Plan's proportionate evidence base.

The Castle Point Borough Strategic Flood Risk Assessment Level 1 (SFRA) was prepared in March to May 2025 and assessed tidal, surface, rivers, groundwater, sewers and other sources. The study found that tidal and fluvial flooding poses the most significant risk to Castle Point, in particular Canvey Island and Hadleigh Marshes. The topography and location of watercourses on Canvey Island means that the whole island is at risk from tidal and fluvial flooding. Although much of the island is protected by the presence of defences, the island is still at residual risk of flooding if the defences were to fail or to be overtopped. This risk is increased as a consequence of climate change and predictions around sea level rise.

Within the mainland area of the Borough, the Prittle Brook and Benfleet Hall Sewer pose the most significant fluvial risk with the southern part of South Benfleet and Hadleigh located within Flood Zone 2 and 3 as well as a small area along the course of the Prittle Brook. High Ground and embankments protect the area from flooding however the area is still at residual risk.

A series of high level site specific assessments were undertaken as part of the draft SFRA Level 2 2025 to assist in the consideration of site options.

## Housing Requirement

The National Planning Policy Framework (NPPF) expects Local Plans to promote the effective use of land to meet identified needs, and strategic policies should describe a strategy for meeting those needs by making the most of previously developed or brownfield land.

The starting point for assessing housing need is the standard methodology set by the Government. The current target for Castle Point, as established using the standard methodology set out in the revised NPPF of December 2024, is 686 new dwellings per annum. This equates to 11,662 over the Plan period.

Being such a small Borough at 17 square miles, there is not the physical or market capacity to meet the government's targets. Over the past 10 years, the Council has on average delivered 99 new homes a year. The Government target would seek a 700% increase in delivery, which presents unrealistic expectation in relation to the availability of skilled construction labour, access to materials and financial investment from developers and broader economic conditions.

Overall, the Plan seeks to provide for a minimum of 6,196 homes over the Plan period to 2043 at an annual average of 364 new homes per annum. Although this does not meet the Government's target the Council is looking to significantly boost supply in this Plan in order to meet local housing needs. At a minimum, the Plan will provide for the local need for housing as identified through the Local Housing Needs Assessment 2023.

## Sites

The following allocated strategic sites, which do not currently benefit from planning consent or a resolution to grant planning permission subject to a Section 106 Agreement, are the subject of this sequential, and where appropriate exception test.

Table 1: Summary of Plan Allocation Name and Numbers

ALLOCATION POLICY NUMBER	ALLOCATION NAME
B3	Furniture Kingdom, London Road
B4	South Benfleet Leisure Quarter
B5	Canvey Supply
B6	159-169 Church Road
B7A	Richmond Avenue Car Park
B7B	Land Adjacent Villa Park, Tarmarisk
B7C	312-320 London Rd (Queen Bee's)
B8	Manor Trading Estate
C1	Canvey TC
C2	Canvey Seafront Entertainment Area
C4	Land in the West of Canvey Island
C8	Two Residential Park Home Sites, Canvey Island
C9	Land at the Point
C10A	Admiral Jellico
C10B	Land Rear of North Avenue
C10C	Essex Coach Works
C10D	Former Council Offices, Long Road
C10E	Corner of Little Gypps Road and Willow Close
C10F	Ozonia Gardens
C10G	Land between Station Road and Seaview Road
HAD1	Hadleigh Town Centre
HAD3	Hadleigh Clinic, 49 London Road
HAD4	Land South of Scrub Lane
THUN2	Kiln Road Campus
THUN3A	Thundersley clinic, Kenneth Road
THUN3B	Thames Loose Leaf

The Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA) identify some reasonable alternative sites. These have been assessed and tested through the SLAA and SA process; however, the allocation sites have been found to be the most appropriate for the purposes of accommodating housing development for a combination of reasons including Regeneration priorities in Canvey (including affordable housing) as well as significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites. This assessment considers the main specific larger alternative

sites. Commentary is provided as part of the assessment as to the implications for the inclusion of alternative sites on the outcomes of the sequential test for those sites located in Flood Risk Zone 3a, primarily on Canvey Island.

## Methodology

### *Sequential Test*

The sequential approach is a decision-making tool designed to select sites so that development is, as far as reasonably possible, located where the risk of flooding from all sources is lowest, taking account of climate change and the vulnerability of future users to flood risk. This will help avoid the development of sites that are inappropriate on flood risk grounds. The subsequent application of the Exception Test where required will ensure that new developments in flood risk areas will only occur where flood risk is clearly outweighed by other sustainability and safety drivers.

The sequential approach can be applied at all levels and scales of the planning process, both between and within Flood Zones. All opportunities to locate new developments (except Water Compatible) in reasonably available areas of little or no flood risk should be explored, prior to any decision to locate them in areas of higher risk.

Current government guidance sets out that a [sequential test](#) is required for major and non-major development (refer to [check the development class](#)) if any proposed building, access and escape route, land-raising or other vulnerable element will be:

- in Flood Zone 2 or 3 - see [flood map for planning](#)
- in Flood Zone 3b and your development is not incompatible
- within 'Flood Zones plus climate change', showing it is at increased risk of flooding from rivers or sea in future – see the [flood map for planning](#)
- within Flood Zone 1 and the [flood map for planning](#) shows it is at risk of flooding from surface water
- in Flood Zone 1 and the LPA's SFRA shows it will be at increased risk of flooding during its lifetime
- subject to sources of flooding other than rivers or sea

Development is exempt from the sequential test if it is:

- solely at risk from surface water flooding and a site-specific FRA demonstrates it will be safe throughout its lifetime, without increasing flood risk elsewhere – this exemption does not apply to sources of flooding other than surface water

Development is also exempt from the sequential test if it is a development on a site allocated in the development plan through the sequential test and:

- the proposal is consistent with site's allocated use
- there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test



You may not need a sequential test if development can be laid out so that only elements such as public open space, biodiversity and amenity areas are in areas at risk of any source of current or future flooding.

Government guidance identifies four different flood risk zones. These will be used when applying the sequential test. These zones are:

- Zone 1 – low probability. All uses of land are appropriate in this zone.
- Zone 2 – medium probability. Essential infrastructure, water compatible, less vulnerable and more vulnerable uses are appropriate in this zone. Highly vulnerable uses are only appropriate in this zone if the exception test is passed.
- Zone 3a – high probability. Water compatible and less vulnerable uses are appropriate in this zone. Highly vulnerable uses should not be permitted. The more vulnerable uses and essential infrastructure should only be permitted in this zone if the Exception Test is passed.
- Zone 3b – functional floodplain. Only water compatible uses and essential infrastructure that has to be there should be permitted in this zone. Essential infrastructure should pass the Exception Test.

Each site has been allocated to a zone having regard to the Environment Agency Flood Risk Zone mapping. Having regard to the restrictions set out above, any site located within zone 3b has been eliminated from consideration at this stage because 'more vulnerable' uses are not permitted in this zone.

Vulnerability of uses is identified in Annex 3 of the National Planning Practice Guidance, and can be summed up as follows

- Essential Infrastructure
- Highly Vulnerable (Includes emergency services stations)
- More Vulnerable (Includes residential)
- Less vulnerable (Includes shops, offices, industry and services)
- Water-compatible development

The capacity of the sites within the zones at lowest risk of flooding were then accumulated in order to determine whether those sites at higher probability of flooding were needed to ensure a five year housing land supply.

Where the cumulative capacity of sites in the lower flood risk zone was insufficient to ensure a five-year housing land supply, all sites in the next lowest flood risk zone were considered to pass the sequential test. Where there was sufficient supply in lower flood risk zones, sites in higher flood risk zones were not considered to pass the sequential test.

## ***Exception Test***

National Planning Guidance is clear that the exception test should be applied where a 'more vulnerable' type of development is located in flood risk zone 3a, and passes the sequential test.

Sites which meet the above criteria must pass two tests. Sites must pass both elements in order to be appropriate for allocation.

**Firstly**, they must demonstrate that the development would provide wider sustainability benefits to the community that outweigh flood risk.

Each of these sites would have been assessed in terms of flood risk in the Sustainability Appraisal. The sustainability appraisal has been used to determine whether other sustainability objectives will be achieved. Where several other sustainability objectives will be achieved, a site has been considered to have passed this element of the Exception Test. Where a site is unlikely to achieve other sustainability objectives, it fails this element of the Exception Test.

**Secondly**, a site specific flood risk assessment must demonstrate 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.

Where available, the site specific flood risk assessments set out in the Strategic Flood Risk Assessment have been considered. Risk is a culmination of the likelihood of a flood event occurring and the extent of hazard that event would cause. Due to the presence of substantial sea defences on Canvey Island, the likelihood of a tidal flood event on Canvey Island is very low, despite its location. However, breach modelling and overtopping modelling undertaken as part of the Strategic Flood Risk Assessment indicates that there is a residual risk of flooding occurring, and the hazard arising from such an event would be high. As part of this assessment, consideration has been given to the level of hazard at each site, considering the appropriate estimated flood event in 2110. These represent the worst-case scenario, taking into account climate change. Advice is set out in these assessments about mechanisms for reducing the risk of flooding at these sites.

Consideration has also been given to the policies in the Thames Estuary 2100 Plan in order to determine whether interventions are likely that will prevent any increase in hazard from occurring, or potentially reduce the level of hazard. Where it is likely that the risk of flooding will not increase, or will reduce as a result of development and/or policy control, this element of the Exception Test will be passed. Canvey Island is covered by policy P4 of the Thames Estuary 2100 Plan. Policy P4 states that there is a need to 'take further action to keep up with climate and land use change so that flood risk does not increase'. To this end, recommendations 6,7, and 11 for action zone 7, in which Canvey Island is located, seek to maintain, enhance, improve or replace the river defence walls and active structures throughout the period to 2100.

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

Vulnerability Classification		Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
Flood Zone	1	✓	✓	✓	✓	✓
	2	✓	Exception Test Required	✓	✓	✓
	3a	Exception Test Required <sup>a</sup>	✗	Exception Test Required	✓	✓
	3b	Exception Test Required <sup>b</sup>	✗	✗	✗	✓ <sup>b</sup>

✓ - Exception Test is not required ✗ - Development should not be permitted

*"a" In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.*

*"b" In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:*

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

## ***Surface Water Flooding***

The NPPF expects local planning authorities to assess the risk from all sources of flood risk, and the Strategic Flood Risk Assessment describes the risks from this source.

Essex County Council has provided the Surface Water model for Benfleet, Hadleigh and Thundersley, as the lead local flood authority. Separate to this, a multiagency group has developed an integrated drainage model for Canvey Island. These models have been used and updated in the SFRA.

The use of the Essex County Council model for Benfleet, Hadleigh and Thundersley is important, as there are multiple and interlinked sources of flooding across administrative boundaries. Some key sources of flood risk in south Essex include river valleys (i.e. The River Crouch, Nevendon Brook, North Benfleet Brook, Basildon Brook, Prittle Brook, Rawreth Brook and the River Roach.), low lying areas, railway embankments and cuttings, topographical low points and local drainage network capacity.

Across South Essex there are 35 Critical Drainage Areas (CDAs), of which five are located in Castle Point. These are in South Benfleet, to the north of Canvey Island, around Leigh Beck on Canvey, Reeds Hill Farm between Thundersley and Benfleet, and in New Thundersley to the north west of the Borough. CDAs are defined as discrete geographical areas within the Surface Water Management Plan where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event thereby affecting people, property, or local infrastructure.

Each of the sites has been assessed against the mapping of Critical Drainage Areas to determine whether:

- a) It is in a critical drainage area; and
- b) The extent of surface water risk

Where a site is outside a critical drainage area, it is considered appropriate for development, in terms of surface water flood risk. Where an allocation site is within a critical drainage area, the SFRA has given consideration has been given to the potential to use source and pathway methods of surface water management to prevent flooding elsewhere. Reference has been had to the updated South Essex Surface Water Management Plan Action Plan in determining whether it is viable to use source and pathway methods in the location of the site. For most of the CDAs property level flood resilience is identified as a potential action, however this is considered to be a last resort action to alleviate existing flood risk issues for existing properties. It is not felt that mitigation of this nature should be used to off-set the impact of new development. A site has only been considered appropriate for development, in terms of surface water flood risk, where it is viable to install surface water management techniques, excluding property level flood resilience.

## ***Groundwater Flooding***

As with surface water, it is necessary to assess the risk of flooding from groundwater sources in order to meet the requirements of the NPPF, and the Strategic Flood Risk Assessment describes the risks from this source.

The SFRA identified potential for groundwater flooding across the Hadleigh and Thundersley areas.

Where a site is not within an area susceptible to groundwater flooding, it will be considered appropriate for development in this regard.

Where a site is within an area susceptible to groundwater flooding, it will only be considered appropriate if alternative options for managing surface water, in addition to infiltration SUDS, are an option for the site, and the development does not contain basement dwellings.

## Results

### *Sequential Test*

#### Allocated Sites

The following Table 3 sets out the result of the sequential test for the allocation sites. The overall cumulative capacity of sites in Flood Risk Zone 1 on this list is **1,725** homes, with a five year supply total of **252** (Based on Housing Topic Paper 2025). Therefore, in order to meet the agreed target, there is a need to include those sites in Flood Risk Zone 3a within the five-year housing land supply.

### Sequential Test of Allocation Sites

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	CAPACITY (Years 1-5)	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, BUT SFRA SHOWS INCREASED RISK OF FLOODING OVER LIFETIME	OTHER SOURCES OF FLOODING - GROUNDWATER
								1in30	1in100	1in1000			
B3	Furniture Kingdom, London Road	48	48	Residential	More Vulnerable	1		1in30: Slight overlap	1in100: Slight overlap	1in1000: Slight overlap	Yes	No increased risk shown in SFRA	0
B4	South Benfleet Leisure Quarter	0	0	Cafés, restaurants, bars and/or public houses	More/Less Vulnerable	1		1in30: Slight overlap	1in100: Slight overlap	1in1000: Moderate overlap	Yes	Slightly increased risk shown in SFRA (Appendix B, Map 1)	0
B5	Canvey Supply	81	41	Residential	More Vulnerable	1		1in30: Slight overlap	1in100: Slight overlap	1in1000: Moderate overlap	Yes	No increased risk shown in SFRA	0
B6	159-169 Church Road	40	40	Residential	More Vulnerable	1		0	0		Yes	No increased risk shown in SFRA	0
B7A	Richmond Avenue Car Park	27	27	Residential	More Vulnerable	1		1in30: Moderate overlap	1in100: Moderate overlap	1in1000: Major overlap	Yes	No increased risk shown in SFRA	0
B7B	Land Adjacent Villa Park, Tarmarisk	10	10	Residential	More Vulnerable	1		1in30: Moderate overlap	1in100: Moderate overlap	1in1000: Major overlap	Yes	No increased risk shown in SFRA	0
B7C	312-320 London Rd (Queen Bee's)	22	22	Residential + Commercial	More Vulnerable	1		0	1in100: Slight overlap	1in1000: Moderate overlap	Yes	No increased risk shown in SFRA	0
B8	Manor Trading Estate	200	0	Residential & Employment	More Vulnerable	1		1in30: Slight overlap	1in100: Slight overlap	1in1000: Moderate overlap	Yes	No increased risk shown in SFRA	0
C1	Canvey Town Centre	820	0	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	1in30: Slight overlap	1in100: Moderate overlap	1in1000: Slight to Moderate overlap	Partially	N/a	0
C2	Canvey Seafront Entertainment Area	Permissive intensification policy	0	Tourism, Leisure and Commercial	Less Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	1in30: Slight to Moderate overlap	1in100: Moderate overlap	1in1000: Moderate overlap	No	N/a	0
C4	Land in the West of Canvey Island	2000	0	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	1in30: Slight overlap	1in100: Slight to Moderate overlap	1in1000: Moderate overlap	No	N/a	0

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	CAPACITY (Years 1-5)	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, BUT SFRA SHOWS INCREASED RISK OF FLOODING OVER LIFETIME	OTHER SOURCES OF FLOODING - GROUNDWATER
								1in30	1in100	1in1000			
C8	Two Residential Park Home Sites, Canvey Island	Permissive expansion policy	0	Residential Park Homes	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	1in30: Slight overlap	1in100: Moderate overlap	1in1000: Moderate overlap	Kings Park - Yes Thorney Bay - No	N/a	0
C9	Land at the Point	185	0	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	1in30: Slight overlap	1in100: Slight to Moderate overlap	1in1000: Moderate overlap	No	N/a	0
C10A	Admiral Jellico	7	7	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	0	0		Yes	N/a	0
C10B	Land Rear of North Avenue	28	0	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	1in30: Slight overlap	1in100: Slight overlap	1in1000: Moderate overlap	No	N/a	0
C10C	Essex Coach Works	12	12	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	0	0		No	N/a	0
C10D	Former Council Offices, Long Road	48	0	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	0	0	1in1000: Slight overlap	No	N/a	0
C10E	Corner of Little Gypps Road and Willow Close	7	7	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	0	0	1in1000: Slight overlap	No	N/a	0



ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	CAPACITY (Years 1-5)	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, BUT SFRA SHOWS INCREASED RISK OF FLOODING OVER LIFETIME	OTHER SOURCES OF FLOODING - GROUNDWATER
								1in30	1in100	1in1000			
C10F	Ozonia Gardens	17	17	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	0	0	1in1000: Major overlap	No	N/a	0
C10G	Land between Station Road and Seaview Road	19	0	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	0	0	1in1000: Major overlap	No	N/a	0
HAD1	Hadleigh Town Centre	388	0	Residential + town centre uses	More Vulnerable	1		1in30: Slight overlap	1in100: Slight overlap	1in1000: Slight overlap	No - except small section at western extent	No increased risk shown in SFRA	Limited Potential
HAD3	Hadleigh Clinic, 49 London Road	14	0	Residential	More Vulnerable	1		0	0		Yes	No increased risk shown in SFRA	Limited Potential
HAD4	Land South of Scrub Lane	114	50	Residential (including 6 supported living)	More Vulnerable	1		0	0		Yes - except southern half	No increased risk shown in SFRA	Limited Potential
THUN2	Kiln Road Campus	730	0	Residential + Retail/Community	More Vulnerable	1		1in30: Slight overlap	1in100: Slight overlap	1in1000: Slight overlap	Yes	No increased risk shown in SFRA	Limited Potential
THUN3A	Thundersley clinic, Kenneth Road	24	0	Residential	More Vulnerable	1		1in30: Slight overlap	0		Yes	No increased risk shown in SFRA	Limited Potential
THUN3B	Thames Loose Leaf	27	14	Residential	More Vulnerable	1		0	0	1in1000: Moderate overlap	Yes	No increased risk shown in SFRA	Limited Potential
<b>TOTAL FZ1 RESIDENTIAL CAPACITIES</b>		<b>1725</b>	<b>252</b>										

### **Alternative Option Sites**

There are alternative sites that the Council has excluded from allocation in the Local Plan for various reasons, many related to their impact on environmental assets or the landscape. These are detailed in the Sustainability Appraisal. The promoters of some of these sites may indicate that these sites are deliverable.

Whilst some of these sites are in Flood Risk Zone 1, and potentially represent an alternative to those proposals allocated on Canvey Island, their allocation as an alternative to a site on Canvey Island is not justified based on the five-year land supply position, as the deficit is such that their allocation would be in addition to any site on Canvey Island in order to achieve a five-year supply. Any such decision could only therefore be taken in respect of the sites own merits having regard to those constraints identified in the Sustainability Appraisal, and not in relation to the site as an alternative to an allocation on Canvey Island.

### **Developable Sites**

The following Table 4 sets out the results of the sequential test for developable sites. In order to meet the objectively assessed need, there is a need for sites with a capacity of **3,235** homes to be identified from this list (this includes accounting for under provision in the period to 2025). The overall cumulative capacity of sites in Flood Risk Zone 1 on this list is **1,775** homes. There is therefore a need to identify sites at higher risk of flooding to meet the agreed housing target.

### **Alternative Option Sites**

There are alternative sites that the Council has excluded from allocation in the Local Plan for various reasons, many related to their impact on environmental assets, green belt, biodiversity or the landscape. These are detailed in the Strategic Land Availability Assessment and the Sustainability Appraisal. The promoters of some of these sites may indicate that these sites are developable.

Whilst some of these sites are in Flood Risk Zone 1, and potentially represent an alternative to those proposals allocated on Canvey Island, their allocation as an alternative to a site on Canvey Island is not justified based on the housing supply position, as the deficit is such that their allocation would be in addition to any site on Canvey Island in order to achieve a sufficient supply. Any such decision could only therefore be taken in respect of the sites own merits having regard to those constraints identified in the wider plan evidence, and not in relation to the site as an alternative to an allocation on Canvey Island.

### **Windfall Allowance**

It is noted that this paper identifies a deficit against the housing target. This paper does not however include the windfall allowance, as by its nature it is not possible to test that figure against the sequential and exception tests at this time.

## Sequential Test of Alternative Option Sites

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB1 (Site ID 40505)	West of Canvey Road	Canvey	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	Slight	Slight	Moderate	No		0
GB10/GB 28 (Site ID 40500 & 40397)	South East of Daws Heath	Daws Heath	Residential	More Vulnerable	Very slight overlap with FZ2 and 3. predominantly FZ1.		Slight	Slight	Slight	No	Slightly increased risk shown in SFRA (Appendix B, Map 1)	Potential for Groundwater to occur at the surface

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB11 (Site ID 40499)	South West of Daws Heath	Daws Heath	Residential	More Vulnerable	Very slight overlap with FZ3. Predominantly FZ1.		Slight	Slight	Slight	No	Slightly increased risk shown in SFRA (Appendix B, Map 1)	Approx. half of site is 'Potential for Groundwater flooding to occur at surface'. Approx. half of site is 'Limited potential for groundwater flooding to occur'
GB12 (Site ID 40498)	The Chase	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur.
GB13 (Site ID 40492)	East of Rayleigh Road	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight / Moderate	No		Limited potential for groundwater flooding to occur.

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB14/29 (Site ID 40101 & 40441)	South of Daws Heath Road / Ragwood Riding Centre	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight / Moderate	No		Limited potential for groundwater flooding to occur.
GB15 (Site ID 40494)	North of Grasmere Road	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur.
GB17	Land off Grange	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur.

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB18	Land off Goldfinch Lane	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur.
GB19	Land North of Thundersley Church Road and East of Downer Road North	Benfleet	Residential	More Vulnerable	FZ1		Slight / Moderate	Slight / Moderate	Slight / Moderate	Yes		Limited potential for groundwater flooding to occur.
GB2 (Site ID 40504)	East of Canvey Road	Canvey	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	Slight	Slight	Slight	No		0

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB20 (IDs 40451, 40046, 40370, 40371)	Land to the East of St Michaels Road	Daws Heath	Residential	More Vulnerable	FZ1		Slight			No		Approx. half of site is 'Potential for Groundwater flooding to occur at surface'. Approx. half of site is 'Limited potential for groundwater flooding to occur'
GB21 (Site IDs 40354, 40171, 40083)	Land off Hilltop Avenue	Between Hadleigh and Benfleet	Residential	More Vulnerable	FZ1		Moderate	Moderate	Moderate	Yes		Limited potential for groundwater flooding to occur.
GB22	Land Between Essex Way and Vicarage Hill	Between Hadleigh and Benfleet	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	Yes		Limited potential for groundwater flooding to occur.



SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB23	Land to the rear of 329 Benfleet Road	Between Hadleigh and Benfleet	Residential	More Vulnerable	FZ1		Slight	Slight	Moderate	Yes		Limited potential for groundwater flooding to occur.
GB24	Land off Shipwrights Close	Hadleigh	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Most of site classed as 'Limited potential for groundwater flooding to occur.'
GB25 (Site ID 40387)	Land to the rear of Beaucroft and Sunray, Bassenthwaite Road	Benfleet	Residential	More Vulnerable	FZ1		0	0	Major	Yes		No
GB26 (Site ID 40111)	Land between Glen Haven and Ye Oaks	Benfleet	Residential	More Vulnerable	FZ1		Moderate	Moderate	Moderate	Yes		No
GB27 (Site ID 40349)	Land adjacent	Benfleet	Residential	More Vulnerable	FZ1		0	0	Slight	Yes		No

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
	298 Church Road											
GB3 (Site ID 40506)	Land south of Charfleets	Canvey	Residential	More Vulnerable	FZ3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	Slight	Slight	Moderate	No		0
GB30 (Site ID 40362)	Land off Netherfield	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	Yes		Limited potential for groundwater flooding to occur.
GB31 (Site ID 40041)	Land off Glyders	Benfleet	Residential	More Vulnerable	FZ1		Moderate	Moderate	Moderate	Yes		Small proportion of site classed as 'Limited potential for groundwater flooding to occur.'

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB32 (Site ID 39933)	Land south of Field Roundabout, Roscommon Way	Canvey	Residential	More Vulnerable	3a	SFRA Appendix D shows more extreme effects in the event of Tidal Breach Modelling in 2125.	Slight	Slight	Moderate	No		0
GB33 (Site ID 40170)	Land West of Kingsley Lane	Thundersley	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur.
GB34 (Site ID 40470)	Grandview Stables, Grandview Road	Thundersley	Residential	More Vulnerable	FZ1		0	0	0	No		Limited potential for groundwater flooding to occur.

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB4 (Site ID 40168)	Land off Glebelands	Benfleet	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	Yes		Limited potential for groundwater flooding to occur.
GB5 (Site Id 40496)	West of Benfleet	Benfleet	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	Partially		Limited potential for groundwater flooding to occur.
GB6 (Site Id 40497)	Lb Felstead Road and Catherine Road	Benfleet	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur' on east side only.

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
GB8a and GB8b (Site ID 40503)	South of Hadleigh	Hadleigh	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	No		Limited potential for groundwater flooding to occur.
GB9 (Site Id 40107)	Oak Tree Farm	Hadleigh	Residential	More Vulnerable	FZ1 - very slight overlap with FZ2/3 at north boundary		Slight	Slight	Slight	No	Slightly increased risk shown in SFRA (Appendix B, Map 1)	Limited potential for groundwater flooding to occur.
N3 (Site Id 40460)	East of Manor Trading Estate	Benfleet	Residential	More Vulnerable	FZ1		0	Slight	Moderate	Yes		0

SITE ID	SITE NAME	SETTLEMENT	PROPOSED USE	VULNERABILITY	FLOOD RISK ZONE	FLOOD ZONES + CLIMATE CHANGE (SFRA) See SFRA Appendices	SURFACE WATER RISK (Slight <10%, Moderate 10-50%, Major >50%, Complete 100%)			CRITICAL DRAINAGE AREA	FZ1, but SFRA shows increased risk of flooding over lifetime	Other Sources of Flooding - GROUNDWATER
							1in30	1in100	1in1000			
Various Ids	North-West Thundersley Broad Location	Benfleet	Residential	More Vulnerable	FZ1		Slight	Slight	Slight	Very slight overlap		Slight overlap with area with 'Potential for Groundwater flooding to occur at surface'.

## Exception Test

When considered against the objectively assessed need of 686 homes per annum, sites within flood risk zones 2 and 3 are required in order to deliver a contribution of homes on Castle Point.

**Table 5: Exception Test Results**

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	PROPOSED USE	TEST PART 1 - WIDER SUSTAINABILITY BENEFITS	TEST PART 2 - FLOOD RISK MANAGEMENT & SAFETY
B3	Furniture Kingdom, London Road	48	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B4	South Benfleet Leisure Quarter	0	Cafés, restaurants, bars and/or public houses	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B5	Canvey Supply	81	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B6	159-169 Church Road	40	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B7A	Richmond Avenue Car Park	27	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B7B	Land Adjacent Villa Park, Tarmarisk	10	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B7C	312-320 London Rd (Queen Bee's)	22	Residential + Commercial	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
B8	Manor Trading Estate	200	Residential & Employment	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	PROPOSED USE	TEST PART 1 - WIDER SUSTAINABILITY BENEFITS	TEST PART 2 - FLOOD RISK MANAGEMENT & SAFETY
C1	Canvey Town Centre	820	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C2	Canvey Seafront Entertainment Area	Permissive intensification policy	Tourism, Leisure and Commercial	Exception test not required in FZ3a for 'Less Vulnerable uses'.	Exception test not required in FZ3a for 'Less Vulnerable uses'.
C4	Land in the West of Canvey Island	2000	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas



ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	PROPOSED USE	TEST PART 1 - WIDER SUSTAINABILITY BENEFITS	TEST PART 2 - FLOOD RISK MANAGEMENT & SAFETY
C8	Two Residential Park Home Sites, Canvey Island	Permissive expansion policy	Residential Park Homes	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C9	Land at the Point	185	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C10A	Admiral Jellico	7	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	PROPOSED USE	TEST PART 1 - WIDER SUSTAINABILITY BENEFITS	TEST PART 2 - FLOOD RISK MANAGEMENT & SAFETY
C10B	Land Rear of North Avenue	28	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C10C	Essex Coach Works	12	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C10D	Former Council Offices, Long Road	48	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	PROPOSED USE	TEST PART 1 - WIDER SUSTAINABILITY BENEFITS	TEST PART 2 - FLOOD RISK MANAGEMENT & SAFETY
C10E	Corner of Little Gypps Road and Willow Close	7	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C10F	Ozonia Gardens	17	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
C10G	Land between Station Road and Seaview Road	19	Residential	Exception: Contribution towards provision of identified housing needs, including affordable housing in Canvey. Regeneration priorities in Canvey. Significant environmental, ecological, landscape, green belt, highways and coalescence issues on non-allocated sites.	Pass. See SFRA Site proformas for more detail. level-2-strategic-flood-risk-assessment-sfra-site-proformas
HAD1	Hadleigh Town Centre	388	Residential + town centre uses	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.

ALLOCATION POLICY NUMBER	ALLOCATION NAME	CAPACITY	PROPOSED USE	TEST PART 1 - WIDER SUSTAINABILITY BENEFITS	TEST PART 2 - FLOOD RISK MANAGEMENT & SAFETY
HAD3	Hadleigh Clinic, 49 London Road	14	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
HAD4	Land South of Scrub Lane	114	Residential (including 6 supported living)	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
THUN2	Kiln Road Campus	730	Residential + Retail/Community	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
THUN3A	Thundersley clinic, Kenneth Road	24	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.
THUN3B	Thames Loose Leaf	27	Residential	FZ1. Exception test not necessary.	FZ1. Exception test not necessary.

## Conclusions

The following conclusions have emerged from this sequential and exception test and assessment of flood risk:

- 1) Based on identified housing needs, there are not sufficient deliverable housing sites within Flood Risk Zone 1 in Castle Point and additional sites located within Flood Risk Zone 3a have therefore been appropriately identified.
- 2) During the remainder of the plan period there are not sufficient developable sites within flood risk zone 1 to meet the housing need, therefore sites within Flood Risk Zones 2 and 3a have been appropriately identified.
- 3) The exception test has been carried out for all sites in Flood Risk Zone 3a to show their relative merits. The Exception Test indicated that all sites presented bring about wider sustainability benefits to the community, would be able to remain safe over their lifetime through the design of development to be flood resistant and resilient, and also through the implementation of the Thames Estuary 2100 Plan.
- 4) In terms of surface water and groundwater, reference should be made to the published SFRA site proformas. However, it appears that risks can largely be avoided and/or mitigated through careful design and the installation of sustainable urban drainage techniques which prevent an increase in flood risk both within the site and to properties nearby.