Draft Test Valley Local Plan 2042

Sequential Test Statement

June 2025

Test Valley Borough Council

1 Introduction

1.1 The purpose of this paper is to support the Revised Regulation 18 statutory consultation on the draft Local Plan 2042. This includes the level of growth for housing and employment and the infrastructure required to deliver this to support the borough's communities and meet their future needs, whilst also protecting the local environment. Since the previous draft Local Plan consultation (Regulation 18 Stage 2 in 2024), a revised NPPF has been published, which has increased our housing needs significantly. The Revised Regulation 18 consultation focusses on those matters related to addressing the increased housing needs, and proposes a series of site allocations to meet this. Following the public consultation, we will take account of any feedback to refine the draft Local Plan.

1.2 This sequential test statement explains how flood risk has been assessed to date in respect of the proposed allocations in the draft Local Plan 2042. It includes information on the different types of flood risk that have been considered, and where relevant, how each site is impacted and to what extent, with accompanying maps.

1.3 The assessment that forms the basis of this sequential test statement takes the form of two tables (Table 1 and Table 2). Table 1 lists the proposed allocations that do not contain any areas of flood risk. Table 2 lists the sites that contain one or more sources of flood risk, with accompanying maps. The assessment identifies flooding from all sources for all of the sites proposed for allocation in the Revised Regulation 18 Local Plan.

2 Policy context

National Planning Policy Framework (NPPF)

2.1 The NPPF[1] sets out the government's planning policies for England and provides guidance for local planning authorities (LPAs) to implement localised plans to deliver sustainable development in the face of the challenges presented by climate change, flooding, and coastal change.

2.2 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2.3 The NPPF states that Local Plans should be supported by Strategic Flood Risk Assessments (SFRA) and should develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant risk management bodies such as Lead Local Flood Authorities and internal drainage boards.

[1] National Planning Policy Framework December 2024

2.4 National policy requires that local plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change to avoid, where possible, flood risk to people and property. The NPPF presents the Sequential and Exception Tests as decision-making tools LPAs should use to direct development to areas with the lowest probability of flooding wherever possible, using a SFRA as the basis for applying these tests.

National Planning Practice Guidance (PPG)

2.5 The PPG provides further guidance on the process used in plan making where flood risk is a consideration. It describes the planning approach to development within areas at risk of flooding from all sources, and it provides information on how flood risk should be taken into account in the preparation of local plans and what SFRAs should include.

3 Strategic Flood Risk Assessment (SFRA)

3.1 A Level 1 Strategic Flood Risk Assessment[2] (SFRA) was published as part of the evidence base supporting the Regulation 18 Stage 2 version of the Local Plan. This SFRA was prepared on behalf of ten planning authorities in South Hampshire as part of the Partnership for South Hampshire (PfSH), and covers the administrative areas of Portsmouth City, Havant Borough, Gosport Borough, Fareham Borough, Eastleigh Borough, Southampton City, Winchester City, New Forest District, New Forest National Park Authority, and Test Valley Borough.

3.2 The PfSH SFRA was prepared in line with the requirements of the NPPF, supporting Planning Practice Guidance (PPG) and Environment Agency guidance 'How to prepare a Strategic Flood Risk Assessment'. It was made up of different parts: a main SFRA report that provides a high-level overview of the national and regional planning context for coastal change and flood risk management in the PfSH area; and a separate report of the local policy and guidance for each planning authority area, including for Test Valley Borough. The SFRA provided flood mapping for all sources of flood risk based on information available at the time, which included some updated modelling for future flood risk accounting for climate change.

3.3 Since the publication of the level 1 SFRA updated national flood risk mapping has been published by the Environment Agency in respect of river, sea and surface water flood risk (NAFRA2) in March 2025. It is anticipated that further data will be published later in 2025 in relation to surface water flooding, including allowing for climate change.

3.4 This sequential test statement uses data from the Level 1 SFRA, and supplemented by other up to date data, such as NAFRA2, to assess the risk of flooding on all the proposed allocations in the Revised Regulation 18 Local

[2] Available: https://www.testvalley.gov.uk/planning-services/planningpolicy/evidence-base/evidence-base-environment

Plan. The same data was used as part of the site assessment process that informed the identification of preferred sites for allocation.

4 Types of flood risk

4.1 The NPPF requires flood risk from all sources to be considered. The different sources of flood risk are considered in turn below.

Rivers and Sea

4.2 Flooding from rivers occurs when water levels rise higher than riverbank levels, causing floodwater to spill across adjacent land (floodplain). Flood risk from rivers is categorised into Flood Zones ranging from Flood Zone 1 (lowest flood risk zone) to Flood Zone 3 (highest flood risk zone). Flood Zone 3b relates to functional floodplain. Flood Zone 2 is considered a medium risk zone. Further detail on the different flood zones and the probability of flooding can be found in the Planning Practice Guidance[3]. The sequential approach to the location of development is to direct development to areas of lowest flood risk. The site assessment process identified land falling within flood zones 2 and 3. Flood zones (FZ) 2 and 3 are shown on the maps:

4.3 Flood risk from the sea, or tidal flooding relates to sea levels. Due to the geography of Test Valley the impact of sea flooding is limited and does not impact on any of the proposed site allocations and so this flood source is not identified in the assessment of sites.

Surface water

4.4 Surface water flooding typically occurs when rainfall in unable to soak into the ground or enter drainage systems. It can run quickly off land and result in localised flooding. Data on surface water flood risk is published by the Environment Agency. Surface water flood risk is categorised into three risk bands - High, Medium and Low, as shown on the maps:

4.5 Further data is expected to be published later in 2025 by the Environment Agency on surface water flooding, including a climate change allowance. Due to the Local Plan timetable this data is not available in time to incorporate into

[3] Flood risk and coastal change - GOV.UK https://www.gov.uk/guidance/flood-risk-and-coastal-change#para77

the evidence base for the Revised Regulation 18 version of the Plan. It will therefore be assessed at the Regulation 19 stage.

Groundwater

4.6 'Areas Susceptible to Groundwater Flooding' is a national dataset produced by the Environment Agency which shows the proportion of 1km squares where geological and hydrogeological conditions show that groundwater might emerge. It does not show the likelihood of groundwater flooding occurring but identifies areas where geological conditions could enable groundwater flooding to occur and where groundwater may come close to the ground. It is not meant for use at a site scale and can only be used in combination with other factors to indicate groundwater flood risk of a wider area.

4.7 The British Geological Survey (BGS) has also produced data on susceptibility to groundwater flooding to indicate where geological conditions could enable groundwater flooding to occur. It does not indicate hazard or risk. Like the Environment Agency data, it is not intended to be used on its own to make planning decisions or to indicate the risk of groundwater flooding but should be used alongside other data. Both the Environment Agency and BGS data are available within the SFRA.

4.8 As identified in the SFRA, the geology underlying Test Valley creates pathways for groundwater to flow allowing the potential for groundwater flooding to occur, particularly when water levels in watercourses are elevated. Development below ground level, e.g. basements have the potential to modify groundwater flows leading to potential flooding. Therefore, where development is proposed that involves significant works below ground and/or changes in drainage, further assessment (for example through a Hydrogeological Risk Assessment (HRA)) may be required to determine the potential impact on groundwater and identify proposed mitigation measures.

4.9 Due to the limitations of using this data at a site scale, the sequential test statement does not assess the groundwater flood risk of individual sites as this may give an inaccurate position on risk. The BGS mapping information contained within the SFRA was acknowledged in the separate assessment of sites for potential allocation (set out in a separate topic paper referred to below). We are having ongoing discussions with the Environment Agency and Hampshire County Council as LLFA on the assessment of groundwater flood risk and this will be considered further to support Regulation 19.

Reservoirs

4.10 Reservoir flooding[4] relates to the release of large volumes of water from a reservoir. This source of flood risk does not impact on any of the proposed site allocations and so this flood source is not identified in the assessment of sites.

[4] Regards had to data available for 'wet' and 'dry' day scenarios

5 Site assessment process

5.1 To arrive at the allocations proposed in the Revised Regulation 18 Local Plan a thorough site selection process has been undertaken[5]. The site selection process assessed a range of constraints, including flood risk.

5.2 The site selection process is a multi-staged process of considering sites, based on a starting point of the Strategic Housing and Economic Land Availability Assessment (SHELAA). The process took account of the available evidence base in undertaking the detailed assessment of sites, which included the SFRA. In March 2025, the Environment Agency published updates to flood risk mapping in relation to river and surface water sources. This information has been taken into account, alongside the SFRA.

5.3 Depending on the scale and nature of the identified flood risk it has the potential to be a significant constraint making a site unsuitable for development. Sites that fell wholly within flood zones 2 or 3 were removed from the site selection process early on in the process, following the sequential approach of directing development to areas at lower risk of flooding. Sites that progressed to the detailed assessment stage were assessed for flood risk from rivers, sea, surface water and reservoirs along with susceptibility to groundwater flooding. Where sites contained areas of flood risk consideration was given to whether development could be accommodated outside of the flood risk area. This assessment informed whether a site was preferred or not preferred.

5.4 The outcome of the site selection process is a number of proposed allocations. A number of the proposed allocations contain areas of flood risk. However in most cases the area of flood risk is very small and in some cases almost indiscernible. Where flood risk is present on site an assessment of the extent of the flood risk has been undertaken to establish whether it is possible to accommodate the level of development proposed outside the flood risk areas, using a sequential approach to layout. This assessment is shown in Table 2.

6 Outcome of assessment

6.1 Some of the proposed allocations do not contain any areas of flood risk. These are listed in Table 1 below. All sites listed in Table 1 have been identified as being free from flood risk, based on the latest available data. Based on current data these sites pass the sequential test.

Table 1: Sites that do not include any areas of flood risk

Site
Land South of London Road, Andover (NA4)
Land East of Ludgershall (NA7)
Land North of Streetway Road, Grateley Station and Palestine (NA17)

[5] See Site Selection Topic Paper

Land west of Newbury Road, Enham Alamein (NA18)
Land south of Eastville, Appleshaw (NA19)
North of Red Rice Road, Upper Clatford (NA21)
Land at Barrow Hill, Goodworth Clatford (NA22)
Land to the North East of Thruxton (NA23)
Tennis Court Field, Barton Stacey (NA24)
Land to North East of Drove Road, Chilbolton (NA25)
Land North of Highwood Lane, Romsey (SA19)
Land adjacent to Hyde Farm, Broughton (SA24)

6.2 Table 2 is included in Appendix 1 and includes the sites that contain flood risk, from one or more sources. Maps showing the extent of the flood risk are included. As the maps show, most of the sites contain only very small areas of flood risk.

6.3 Sites that contain areas of flood risk will be considered further through the level 2 SFRA and will be subject to an updated sequential test and where necessary through the application of the exception test. This will include consideration of alternative sites and of ways to mitigate and manage flood risk.

6.4 As set out above (paragraph 5.3) we sought to avoid development within higher risk areas by removing sites that fell wholly within flood zones 2 or 3 early on in the site selection process, following the sequential approach. For sites that progressed to the detailed assessment stage that contained areas of flood risk we undertook an assessment of the extent of the flood risk to establish whether it is possible to accommodate the level of development proposed outside of the flood risk areas. In most cases the areas of flood risk within the proposed allocations are very small and so can easily be avoided when taking a sequential approach to the layout of development within the site.

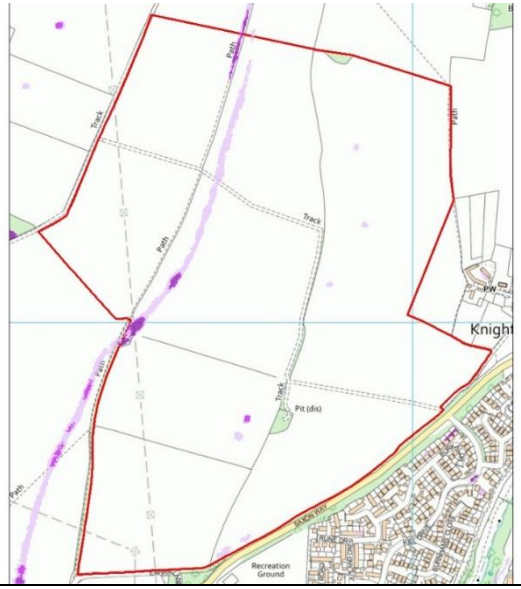
6.5 The assessment of flood risk forms a key part of the overall planning balance when considering the suitability of sites for development. In assessing sites we have considered the overall sustainability with regard to relevant national and local policies. We have appraised all the sites through a site selection process, as detailed in the Site Selection Topic Paper, which also provides our justification for allocating or discounting sites from further consideration. The topic paper along with this statement demonstrate the application of the sequential approach to steer development to the lowest risk areas, where it is compatible with sustainable development objectives.

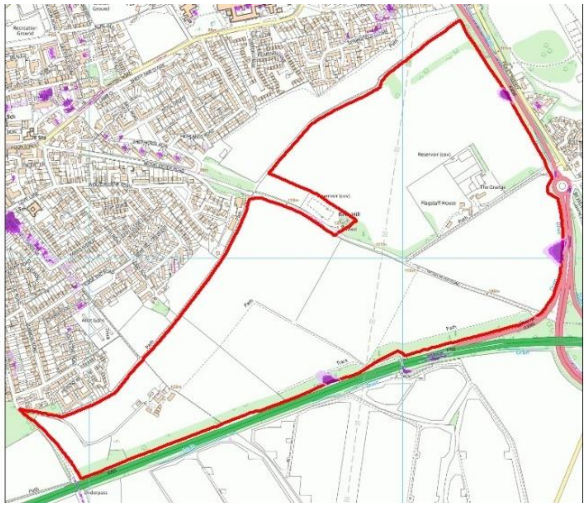
7 Next steps

7.1 For the next stage of the local plan (Regulation 19) an updated sequential test will be prepared. This will take account of additional data on flood risk that is anticipated to be published by the Environment Agency later in 2025, which will include data accounting for climate change in relation to surface water flood risk.

7.2 A Level 2 SFRA will also be prepared to support the Regulation 19 Local Plan, which will provide a detailed assessment on the nature of the flood risks identified in the Level 1 report in relation to the proposed allocations. It will include an assessment of each proposed site allocation setting out the risk of flooding from all sources, both now and in the future, and recommendations for how development could be delivered on site to pass the exception test, with accompanying maps. It will involve engagement with stakeholders such as the lead local flood authority (Hampshire County Council) and the Environment Agency.

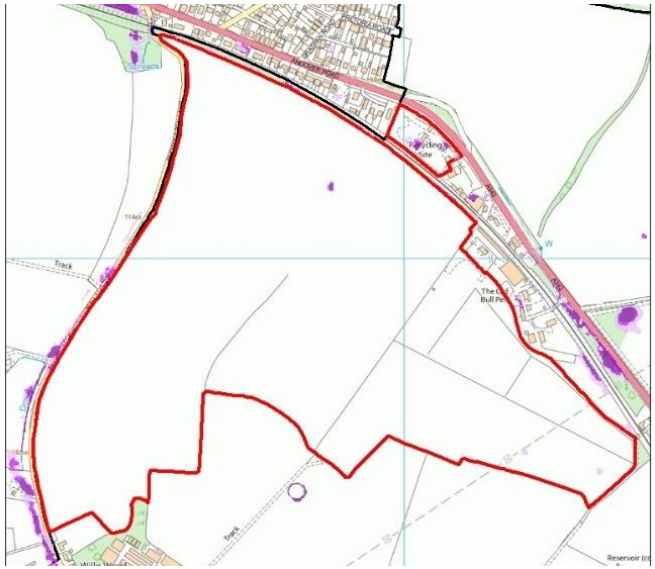
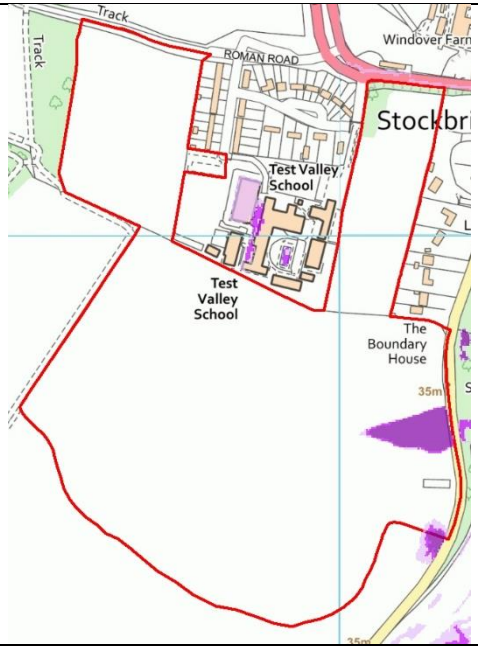
Appendix 1: Table 2
Sites that include areas of flood risk

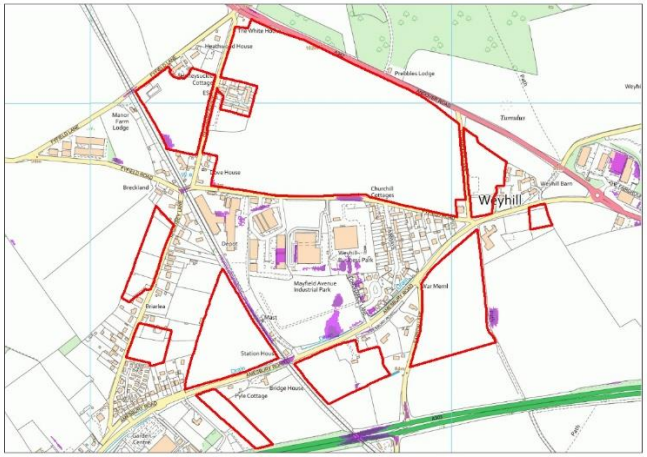
Site	Rivers	Surface Water	Commentary
Land at Manor Farm, North of Saxon Way (NA5)	N/A		A very small part of the site is within an area at risk of flooding from surface water including in the 'high' risk band (comprising a ribbon of land running north-south through centre of site). Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

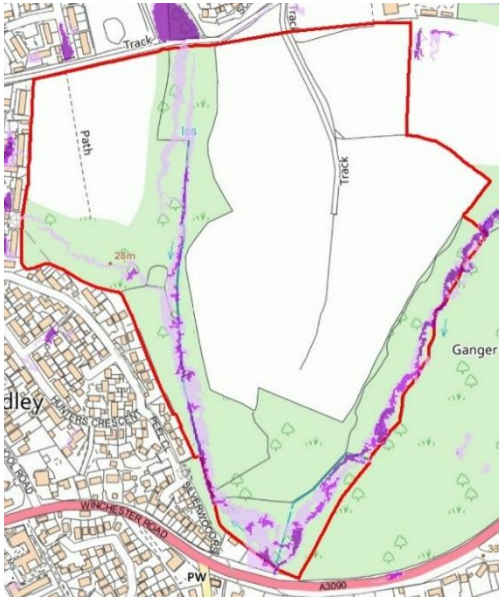
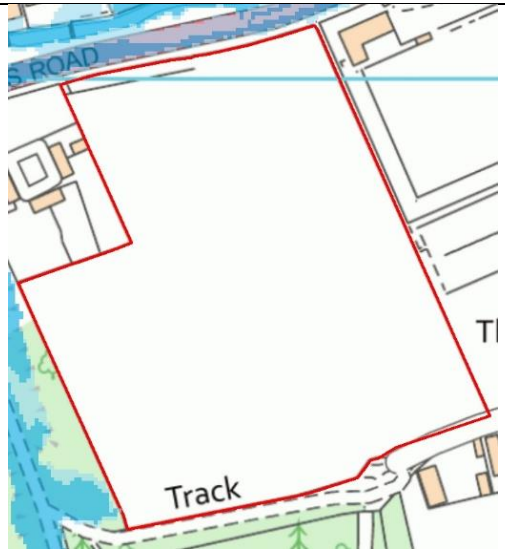
Site	Rivers	Surface Water	Commentary
Land at Bere Hill (NA6)	N/A		Parts of the site covering a very small area, and focussed along the boundaries of the site, are within an area at risk of flooding from surface water, including in the 'high' risk band. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land at Finkley Down Farm (NA11)	N/A		Very small parts of the site are within an area at risk of flooding from surface water, including in the 'high' risk band, focussed mainly on the southern boundary and covering a small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Land east of Smannell Lane (NA12)	N/A		Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band, focussed in the southwest corner and covering a small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Land West of Andover (NA13)	N/A		Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band, focussed on the southern boundary and covering a small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
East of Hatherden Road (NA14)	N/A		Part of the site is within an area at risk of flooding from surface water, including a small area focussed on the southern boundary in the 'high' risk band and running up through the centre of the site. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

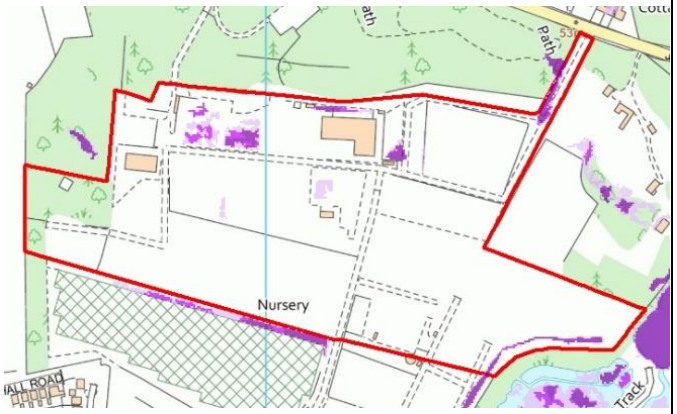
Site	Rivers	Surface Water	Commentary
Land South East of Ludgershall (NA8)	N/A		Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band, covering a very small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land adjacent to Danebury School (NA15)	N/A		Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band, focussed on the eastern boundary and covering a small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

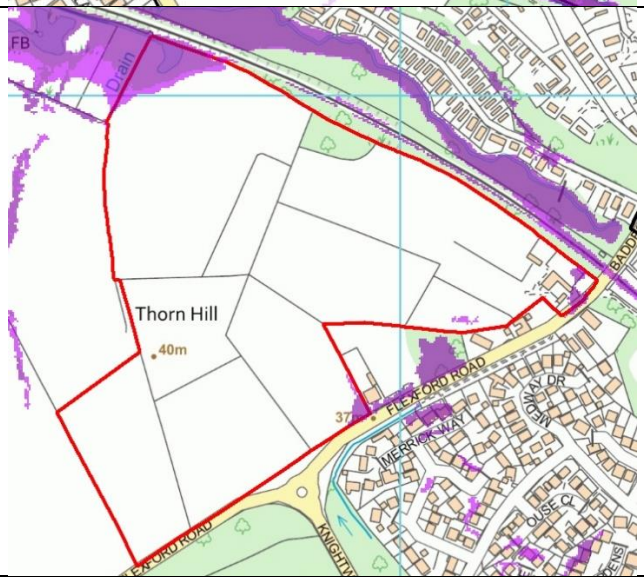
Site	Rivers	Surface Water	Commentary
Expansion of Weyhill (NA16)	N/A		A small part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land at Bulberry Field, Duck Street (NA20)	N/A		A small part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

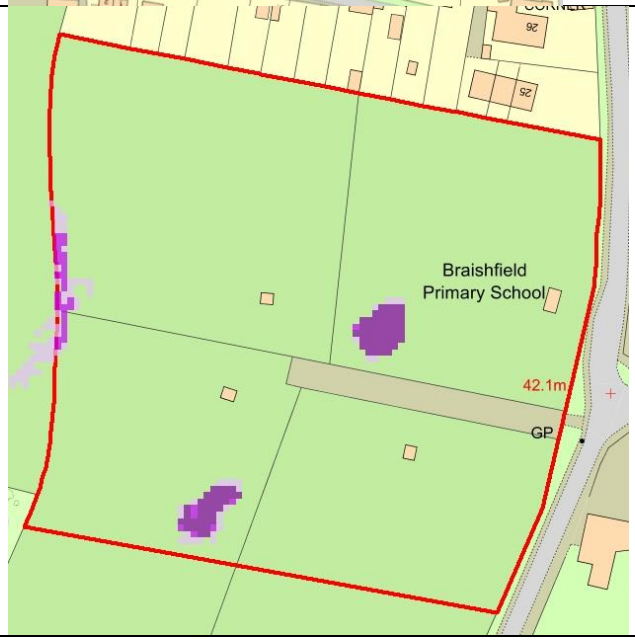
Site	Rivers	Surface Water	Commentary
Land South of Ganger Farm, Romsey (SA4)			Part of the site is within flood zones 2 and 3. Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land South of the Bypass, Romsey (SA5)			The site adjoins areas at risk of flooding from rivers (flood zones 2 and 3) to the north, affecting access to the site from Romsey Road. Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band.

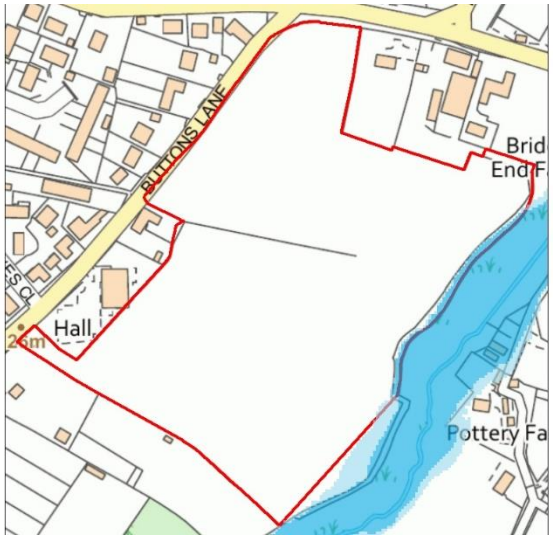
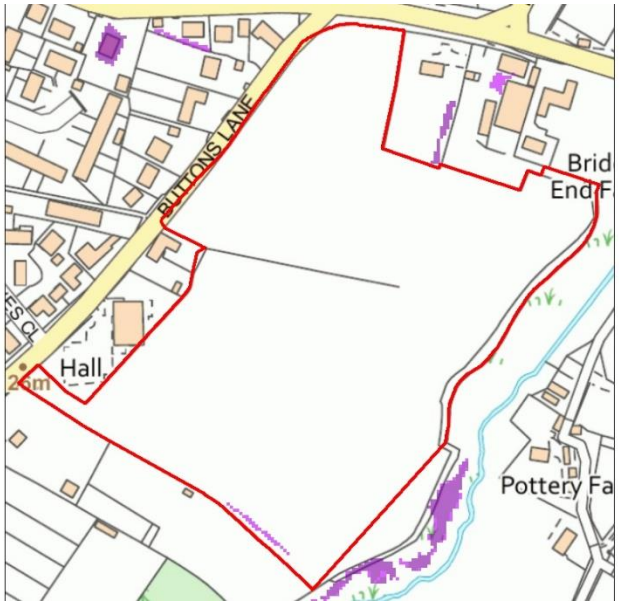
Site	Rivers	Surface Water	Commentary
Land at Velmore Farm, Valley Park (SA6)			Part of the site is within flood zones 2 and 3, covering a small area. Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band, covering a small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land at Ampfield Meadows (SA7)	N/A		Part of the site is within an area at risk of flooding from surface water, including in the 'high' risk band, covering a small area. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Land at Upton Lane (SA8)	N/A		Part of the site is within an area at risk of flooding from surface water – this relates to a number of small areas along or near to the boundaries to the north east and south west, including areas of high, medium and low risk. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Halterworth (SA18)	N/A		Part of the site is within an area at risk of flooding from surface water, covering some small areas in the centre of the site (including in the high risk band). Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Brentry Nursery (SA20)	N/A		Parts of the site to the north and southeast are within an area at risk of flooding from surface water (high, medium and low risk). Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Packridge Farm (SA21)	N/A		Small parts of the site mainly focussed around the northern and eastern boundaries are identified as being within a zone at risk of flooding from surface water (areas of high, medium and low risk). Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Fields Farm (SA22)	N/A		Part of the site is within an area at risk of flooding from surface water. This relates to several small areas within the site to the centre and east, including area of high, medium and low risk. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land at Flexford Road (SA23)	N/A		Part of the site is within an area at high risk of flooding from surface water in the north of the site. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Land West of Holbury Lane (SA26)	N/A		Land within flood zone 3 lies immediately to the north / north west of the site in connection with the River Dun, but does not encroach into the site. There is a tiny area of surface water flood risk (low probability) in the southeast corner. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.
Land West of Braishfield Road (SA27)	N/A		Part of the site is within an area at risk of flooding from surface water, covering some small areas in the centre, to the south and along the western boundary (including in the high risk band). Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.

Site	Rivers	Surface Water	Commentary
Land South of Romsey Road (SA29)			Part of the site is within an area at risk of flooding from surface water, along the southern boundary, covering a very small area. The site adjoins an area at risk of flooding from rivers (flood zones 2 and 3) to the east, with a small area of the site along the boundary affected. Due to the size flood risk area in relation to the overall size of the site it is considered that development could be accommodated taking a sequential approach to layout to avoid areas of flood risk.