



SURREY HEATH BOROUGH COUNCIL

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

## Sequential & Exception Tests for Site Allocations

### NaFRA2 Flood Map for Planning (FMfP) Addendum



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Surrey Heath Borough Council  
Knoll Road, Camberley GU15 3HD  
[planning.consultation@surreyheath.gov.uk](mailto:planning.consultation@surreyheath.gov.uk)



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## I. Introduction

- I.1. In March 2025 Surrey Heath Borough Council published the Sequential & Exception Tests for Site Allocations (March 2025). This document forms part of the evidence base supporting the Surrey Heath Pre-Submission Local Plan (2019-2038): (Regulation 19) and demonstrates that the sites allocated within the Pre-Submission Local Plan 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).
- I.2. The Sequential & Exception Tests for Site Allocations (March 2025) were based on evidence set out within the Surrey Heath Level 2 Strategic Flood Risk Assessment (SFRA). The Level 2 SFRA was prepared prior to the public release of the new NaFRA2 Flood Map for Planning (FMfP) and accordingly, the Level 2 SFRA was prepared using the updated Risk of Flooding from Rivers and Sea (RoFfRS) mapping released in January 2025, in agreement with the Environment Agency. This was considered to represent the most up-to-date mapping available at the time the Level 2 SFRA was undertaken.
- I.3. The Environment Agency updated the FMfP on the 25<sup>th</sup> March 2025. Following the introduction of the FMfP, an Addendum to the Level 2 SFRA was prepared in order to review any changes to fluvial flood risk at sites previously considered through the Level 2 SFRA. The Addendum, which was completed in August 2025, identified that fluvial flood risk had changed at 5 of the Council's identified site allocations, based on the new FMfP mapping.
- I.4. The Council has prepared this Addendum to the Sequential & Exception Tests for Site Allocations in order to highlight where changes to fluvial flood risk have been identified following the introduction of the FMfP and to evaluate these changes in the context of the Sequential and Exceptions Tests.
- I.5. This document should be read in conjunction with the Sequential & Exception Tests for Site Allocations (March 2025).



## 2. Discussion of sites where fluvial flood risk has changed following the introduction of the updated Flood Map for Planning (FMfP)

2.1. Following the introduction of the FMfP, a screening exercise was undertaken through the Level 2 SFRA Addendum to assess how the percentage of fluvial flood risk had changed at each site between the Risk of Flooding from Rivers and Sea (RoFfRS) mapping used for the Level 2 SFRA assessment and the new NaFRA2 FMfP. The Level 2 SFRA Addendum identifies changes at the following sites:

- The Grange, St Catherines Road, Deepcut;
- 439 – 445 London Road, Camberley;
- Broadford, Castle Grove Road, Chobham;
- Land adjacent to Sherrard Way, Mytchett; and,
- Swift Lane Extension, Bagshot.

2.2. The changes at each site are summarised below, alongside information on how any changes have been considered in the context of the sequential and exceptions test process.

### The Grange, St Catherines Road

2.3. The FMfP mapping indicates that fluvial flood risk at The Grange has reduced.

2.4. The RoFfRS mapping used in the Level 2 SFRA (March 2025) indicated that c.8% of the site was anticipated to be at risk of fluvial flooding, with an access falling within the affected area. In contrast, the FMfP indicates that no areas of Flood Zone 2 or 3 encroach on the site.

2.5. The sequential test undertaken in March 2025 concluded that development at The Grange could comfortably be accommodated outside areas of fluvial flood risk and classified The Grange as a 'low risk' site accordingly, in alignment with the sequential test methodology.

2.6. As the FMfP indicates a reduction in fluvial flood risk at the site, the conclusion reached in the Sequential and Exception Tests for Site Allocations (March 2025) – that development at the site can be directed to areas of lowest flood risk – remains valid and appropriate.

### 439-445 London Road

2.7. The FMfP mapping indicates that fluvial flood risk at 439-445 London Road has increased slightly.



- 2.8. The RoFfRS mapping used in the Level 2 SFRA (March 2025) indicated that the site at 439-445 London Road, Camberley was not subject to flood risk from any sources. The updated FMfP mapping indicates that a small area in the northwest corner of the site (representing 1% of the site in total) now falls within Flood Zone 2.
- 2.9. The site was classified as 'low risk' in the sequential test undertaken in March 2025. Whilst the FMfP indicates that the risk of fluvial flooding has increased slightly in this location, the Council considers that the conclusion reached in the Sequential and Exception Tests for Site Allocations (March 2025) remains valid and appropriate, as it is considered that – in view of the site capacity and limited area of the site affected by fluvial flooding – development at the site can be directed to areas of lowest flood risk.

### Land adjacent Sherrard Way

- 2.10. The FMfP mapping indicates that fluvial flood risk at Land Adjacent Sherrard Way has changed slightly.
- 2.11. The RoFfRS mapping used in the Level 2 SFRA (March 2025) indicated that up to c.72% of the site was anticipated to be at risk of fluvial flooding, with c.68% of the site falling within Flood Zone 3. The updated FMfP mapping indicates that there has been a slight reduction in the extent of Flood Zone 3 (66%), and a slight increase in the extent of Flood Zone 2 (82%) at this site.
- 2.12. The sequential test undertaken in March 2025 concluded that the developable area of the site fell outside of areas of fluvial flood risk and classified Land adjacent Sherrard Way as a 'low risk' site accordingly, in alignment with the sequential test methodology.
- 2.13. The developable area of the site is not affected by changes resulting from the FMfP. As a result the conclusion reached in the Sequential and Exception Tests for Site Allocations (March 2025) – that development at the site can be directed to areas of lowest flood risk – remains valid and appropriate.

### Broadford, Castle Grove Road

- 2.14. The FMfP mapping indicates that fluvial flood risk at Broadford, Castle Grove Road has changed slightly.
- 2.15. The RoFfRS mapping used in the Level 2 SFRA (March 2025) indicated that up to c.40% of the site was anticipated to be at risk of fluvial flooding, with c.34% of the site falling within Flood Zone 3. The updated FMfP mapping indicates that there has been a slight increase in the extent of Flood Zone 2 (44%) at this site, with part of an existing site access affected.





- 2.16. The sequential test undertaken in March 2025 concluded that the developable area of the site fell outside of areas of fluvial flood risk and classified Broadford as a 'low risk' site accordingly, in alignment with the sequential test methodology.
- 2.17. The developable area of the site is not affected by changes resulting from the FMfP. As a result the conclusion reached in the Sequential and Exception Tests for Site Allocations (March 2025) – that development at the site (including site access) can be directed to areas of lowest flood risk – remains valid and appropriate.

### Swift Lane Extension

- 2.18. The RoFFRS mapping indicates that Swift Lane Extension is at low risk of fluvial flooding, with only small areas of the northernmost part of the site adjacent to the Windlebrook falling within Flood Zones 2/3. The updated FMfP indicates that the full extent of the site now falls within Flood Zone 2.
- 2.19. The Sequential and Exception Tests for Site Allocations (March 2025) set out at Appendix 2 that:

*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*

- 2.20. As a result, the conclusion reached in the Sequential and Exception Tests for Site Allocations (March 2025) – that development at the site should be treated as high risk – remains valid and appropriate. It is also noted that Swift Lane Extension is the only 'more vulnerable use' identified in the Sequential Test and that as a result, no re-sequencing of sites arises from the change in fluvial flood risk associated with the introduction of the FMfP.
- 2.21. Taking account of the change in flood risk associated with the site, it is considered appropriate to update the Exceptions Test for Swift Lane Extension, in order to reflect the updated FMfP. Notwithstanding this, the outcomes of the assessment remain unchanged and it remains the conclusion of the Council that the site passes both part A and part B of the exception test (see Annex I).



### 3. Conclusion

- 3.1. The Council has reviewed the changes resulting from the introduction of the FMfP in the context of the sites identified within the Sequential and Exception Tests for Site Allocations (March 2025) and has determined that the conclusions reached within the assessment remain valid and appropriate.





## Annex I: Updated Exception Test

### Swift Lane Extension, Bagshot

- 3.2. 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).
- 3.3. The site was previously taken through the Exceptions Test in both the interim Sequential and Exceptions Test and the Sequential and Exceptions Test March 2025, despite the RoFfRS dataset showing that only small areas of the site were affected by Flood Zone 2/3.
- 3.4. The Council considered that this was appropriate for the following reasons:
- The Environment Agency's historic flooding and recorded flood outline datasets show that in September 1968, the Windle Brook exceeded its capacity and overtopped;
  - Until the release of the Environment Agency's Risk of Flooding from Rivers and Sea (RoFfRS) mapping, the site was identified as falling almost entirely in Flood Zone 2;
  - Some areas of Flood Zone 2/3a/Indicative Flood Zone 3b were present at the site;
  - The use is classified as 'highly vulnerable'.
- 3.5. The updated FMfP shows the full extent of the site to fall within Flood Zone 2 with some, small areas falling within Flood Zone 3. It is also recognised that there are some areas of the site that are at medium/high risk of surface water flooding and the risk of surface water flooding may increase in a climate change scenario. In this context and taking account of relevant National Planning Practice Guidance, the Exception Test must be applied.

### Part A: Wider sustainability benefits

- 3.6. 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.
- 3.7. 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.



- 3.8. 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.
- 3.9. 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.
- 3.10. 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?**

- 3.11. The Level 2 SFRA indicated 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.
- 3.12. Since the completion of the Level 2 SFRA, the FMfP mapping has been released which now suggests that all of the site falls within Flood Zone 2, with some areas falling within Flood Zone 3. Accordingly, the Level 2 SFRA Addendum emphasises that the recommendations set out above will still need to be considered for development to proceed at the site.
- 3.13. Notwithstanding this, the Level 2 SFRA Addendum also notes that the extent of Flood Zone 2 shown on the FMfP is based on the inclusion of the Environment Agency's Historic Flood Map extent which includes a record of flooding at Swift Lane from September 1968 rather than national or detailed hydraulic modelling. Planning history suggests that between 1968 and the early 1980s, when the site was first brought into use as a Gypsy & Traveller site, there had been an increase in land levels as a result of the use of the site for landfill. The Level 2 SFRA Addendum suggests that this is likely to explain the difference in the historic flood extent shown at the site and the new national modelling and concludes that it is therefore likely that the flood risk issues at the site can be addressed through site design and an appropriate Flood Risk Assessment at Planning Application stage.
- 3.14. In respect of site design, 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 HI2 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

- 3.15. 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.

