

# Sequential Test and Exception Test



June 2026

Sevenoaks District Council Local Plan Regulation 19

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# 1. Introduction

- 1.1 This report sets out the application of the Sequential Test and Exception Test for flood risk in Sevenoaks District, to support the site allocations identified in the emerging Local Plan.
- 1.2 The tests draw upon the Level 1 Strategic Flood Risk Assessment (SFRA), with emerging findings from the Level 2 SFRA taken into account to inform the understanding of site-specific flood risk constraints. The Level 2 SFRA will be published as part of the wider evidence base alongside the Regulation 19 publication. The approach follows the procedural framework for flood risk set out in the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).

## 2. National Planning Policy Context

- 2.1 Paragraph 170 of the National Planning Policy Framework (NPPF) sets out that inappropriate development in areas at risk of flooding should be avoided by directing development towards areas of lower risk. This is achieved through the application of the sequential approach, which prioritises locations that are sequentially preferable in flood risk terms.
- 2.2 Paragraph 172 of the NPPF requires plans to apply a sequential, risk-based approach to the location of development. This includes taking account of all sources of flood risk, as well as the current and future impacts of climate change, to avoid risk to people and property where possible. Central to this approach is applying the sequential test, which considers whether there are reasonably available alternative sites capable of accommodating the proposed development at a lower level of flood risk.
- 2.3 The Planning Practice Guidance (PPG) on Flood Risk and Coastal Change provides further direction on the application of the sequential test, including guidance on what may constitute a 'reasonably available' alternative site.
- 2.4 For residential development and other uses, depending on their vulnerability classification, the Exception Test may also be required in accordance with paragraph 177 of the NPPF. This requires demonstration that the development would deliver wider sustainability benefits

that outweigh the flood risk, and that it can be made safe for its lifetime, taking into account the effects of climate change.

2.5 This document sets out the application of the sequential test to support the proposed allocation of land within areas identified as being at risk of flooding in the emerging Local Plan. It considers a range of development types, including residential, regeneration opportunities within the main settlements, community uses and employment sites. Flood risk is defined with reference to the National Flood Map for Planning and the Council's Strategic Flood Risk Assessment (SFRA).

2.6 In addition to the sequential test, and in line with the PPG, consideration is also given to whether the proposed development would provide wider sustainability benefits that outweigh the identified flood risk. Matters relating to site safety will be addressed at the planning application stage through a site-specific Flood Risk Assessment (FRA), which should reflect the most up-to-date evidence available and take account of the proposed development's layout, design, and access arrangements, in accordance with paragraph 187 of the NPPF.

### **3. The Sequential Test and Exception Test**

3.1 When allocating land for development, the NPPF requires the Sequential Test to be applied to demonstrate that there are no reasonable alternative sites with a lower probability of flooding for the type of development or land use proposed.

3.2 In applying the Sequential Test, land in Flood Zone 1 is preferred. If there are not sufficient reasonably available sites for the proposed development in Flood Zone 1, development in Flood Zone 2 should next be considered. Only when development in Flood Zones 1 and 2 cannot be accommodated, then development in Flood Zone 3 will be considered. Essentially, the test seeks to steer development towards locations with the least amount of flood risk before locations with higher flood risk are explored.

3.3 The application of the Sequential Test in preparing the Local Plan is set out in the diagram below:

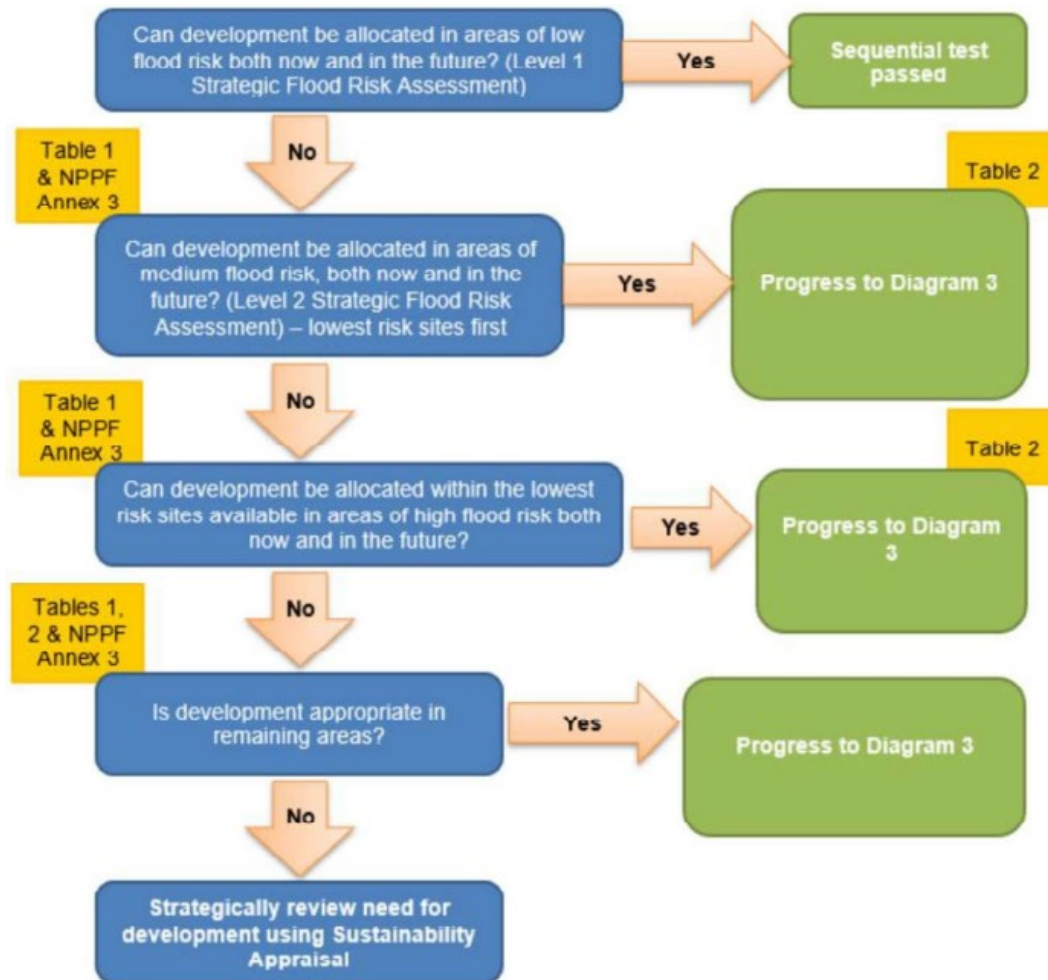


Figure 1: Application of the Sequential Test for Local Plan Preparation (Source: Diagram 2 of the Planning Practice Guidance: Flood Risk and coastal change)

3.4 Where the Sequential Test has been applied and it has not been possible to locate all development in areas of lowest flood risk, the NPPF requires the Exception Test to be applied in certain circumstances.

3.5 The Exception Test is required for the following types of development:

- Highly Vulnerable development proposed in Flood Zone 2; and
- More Vulnerable development proposed in Flood Zone 3a.

Highly Vulnerable development is not appropriate in Flood Zone 3 and should not be permitted.

The flood risk vulnerability classification set out in the NPPF Annex 3 is summarised as below for highly vulnerable and more vulnerable developments:

Vulnerability Classification	Types of Development
Highly Vulnerable	<ul style="list-style-type: none"> <li>• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Caravans, mobile homes and park homes intended for permanent residential use.</li> <li>• Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)</li> </ul>
More Vulnerable	<ul style="list-style-type: none"> <li>• Hospitals</li> <li>• Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Landfill and sites used for waste management facilities for hazardous waste.</li> <li>• Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.</li> </ul>

3.6 The purpose of the Exception Test is to ensure that development located in areas at higher risk of flooding delivers wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere.

3.7 For the Exception Test to be passed, both of the following elements must be satisfied:

- Part A, which requires wider sustainability benefits to the community; and
- Part B, which requires the development to be capable of being made safe for its lifetime without increasing flood risk elsewhere.

3.8 If either part of the Exception Test is not satisfied, the development should not be allocated or permitted.

## 4. Sevenoaks District Council Local Plan Site Allocations

4.1 The Sevenoaks District Local Plan makes provision for 17,211 homes for the plan period 2027–2042. This comprises a proposed new standalone settlement at Pedham Place, strategic site allocations and non-strategic site allocations (including employment and mixed-use), extant planning permissions and windfall/small sites allowance.

4.2 The Local Plan development strategy focuses on:

- Urban sites (i.e. within existing settlement confines, at optimised density)
- Previously Developed Land (PDL) or Brownfield land (either within or adjacent to a settlement)
- Poorly-performing Green Belt, now known as 'grey belt' (adjacent to a higher tier settlement or train stations).

4.3 The Strategic Housing and Economic Land Availability Assessment (SHELAA) informs the identification of reasonably available sites, having assessed site availability, suitability and achievability. This includes consideration of key constraints such as flood risk, alongside the spatial strategy including the prioritisation of urban sites, previously developed land, and sustainably located grey belt as set out in the Local Plan and Settlement Hierarchy.

4.4 Through this process, sites that were not available, not suitable, or not capable of delivering the required quantum of development were discounted and not taken forward as reasonable alternatives. The detailed outcomes of the wider site assessment process, including the reasons why sites were discounted or not taken forward, are set out in the SHELAA appendices. This Sequential Test does not seek to duplicate that assessment, but uses its conclusions to identify whether any reasonably available lower-risk alternatives exist for the type and scale of development proposed.

4.5 In identifying reasonable alternatives, the assessment has had regard to national policy requiring a sequential, risk-based approach. Alternatives have been considered in the context of the development need, the role of the site within the Local Plan strategy, and the availability, suitability and achievability of sites as assessed through the SHELAA.

4.6 The area of search for reasonably available alternative sites reflects the spatial strategy of the Local Plan and the scope of sites assessed through the SHELAA, having regard to the type, scale and locational requirements of development. This includes a focus on the most sustainable settlements, as identified through the Settlement Hierarchy.

4.7 The NPPF does not prescribe a fixed definition of 'reasonable alternatives.' Therefore, for the purposes of this assessment, this has been interpreted in a proportionate manner having regard to the development need, spatial strategy, and site availability, suitability and achievability.

4.8 For the purposes of the Sequential Test, reasonable alternatives are therefore limited to sites that:

- Perform the same or a comparable strategic/local planning role;
- Are within the same settlement, functional area or search area relevant to the identified need;
- Are capable of accommodating the same type and scale of development;
- Are available, suitable and achievable, as assessed through the SHELAA methodology; and
- Would be at a lower level of flood risk, having regard to all relevant sources of flood risk.

4.9 Flood risk was considered as part of the SHELAA suitability assessment, alongside other key environmental, infrastructure and locational constraints, including the spatial strategy and focus on directing development to the most sustainable settlements. Sites with significant flood risk constraints, including those affected by higher probability flood zones, or sites that were otherwise unavailable, unsuitable or

unachievable, were not taken forward as reasonable alternatives.

4.10 No reasonably available sites in areas of lower flood risk were identified through the SHELAA and Local Plan site selection process that could accommodate the same type and scale of development and perform a comparable role within the development strategy.

## 5. Methodology and Evidence Base

### Methodology

#### Flood Zone Classification and Approach

5.1 Flood Zones are defined by the Environment Agency and indicate the probability of fluvial or tidal flooding:

- Flood Zone 1 – low probability
- Flood Zone 2 – medium probability
- Flood Zone 3 – high probability

Flood Zone 3 is further subdivided into:

- Flood Zone 3a (high probability)
- Flood Zone 3b (functional floodplain)

Flood Zone 3b comprises land where water has to flow or be stored in times of flood and is subject to the most stringent policy restrictions.

5.2 For the purposes of the Sequential Test, a precautionary approach is applied whereby any part of a site located within Flood Zone 2 or Flood Zone 3a results in the site being treated as within that Flood Zone, regardless of the extent of coverage.

5.3 Flood Zone 3b is treated differently. It is not considered appropriate for 'more vulnerable' development and is excluded from the developable areas of all allocations. Where present, development is directed to land outside Flood Zone 3b.

5.4 Some allocation sites are predominantly located within Flood Zone 1 but include small, localised areas of Flood Zone 2. In these cases, the Sequential Test treats the site as affected by Flood Zone 2 in line with national guidance, while recognising that the extent of fluvial risk is limited. In most cases, such limited areas of Flood Zone 2 do not warrant Level 2 SFRA site sheets and can be addressed at planning application stage through the site-specific Flood Risk Assessment (FRA). Where the internal SFRA screening indicates that further assessment may be required, this will be considered as part of the Level 2 SFRA work.

5.5 This approach aligns with national policy and ensures a precautionary and consistent application of the Flood Zone hierarchy.

### **Assessment of Other Sources of Flood Risk**

5.6 In addition to fluvial and tidal flooding, sites may be affected by other sources of flood risk, including:

- Surface water flooding
- Groundwater emergence
- Sewer flood risk
- Reservoir breach

5.7 These sources do not change the Flood Zone classification and therefore do not affect the Sequential Test hierarchy. They are relevant to the scope and detail of site-specific Flood Risk Assessments (FRA) required at planning application stage.

5.8 Surface water flood risk has been assessed using Environment Agency mapping alongside SFRA site-screening analysis. This provides a consistent and evidence-based approach to identifying areas where site-specific mitigation measures are likely to be required at the planning application stage. The assessment incorporates both present-day conditions and allowances for climate change, ensuring alignment with national guidance.

5.9 Groundwater flood risk has not been used to differentiate between sites within the Sequential Test. As outlined in the Level 1 SFRA (Appendix B), groundwater mapping datasets are not sufficiently precise, spatially consistent, or comparable at the strategic scale required for plan-making purposes. Consequently, groundwater flood risk is more appropriately considered at the planning application stage, where it can be assessed through site-specific Flood Risk Assessments (FRAs) informed by local ground conditions and investigations.

- 5.10 Flood risk from sewers and reservoirs has also not informed the application of the Sequential Test. As set out in the Level 1 SFRA (Appendix B), the available datasets for these sources do not provide a sufficiently robust, comprehensive, or consistent basis for comparing relative flood risk across sites. Specifically:
- Sewer flood risk data is limited in coverage, often reactive in nature, and subject to under-reporting, meaning it does not support a meaningful or equitable comparison of risk at a strategic level.
  - Reservoir inundation mapping identifies the maximum potential extent and consequences of a breach scenario, rather than the probability or likelihood of occurrence. As such, it does not align with the risk-based principles underpinning the Sequential Test.
- 5.11 As a result, these sources of flooding do not influence Flood Zone classification and have not been used to inform the Sequential Test process.
- 5.12 Notwithstanding this, a precautionary approach has been embedded within the SFRA process. Where potential risks from sewer or reservoir flooding are identified, these are examined in greater detail within the Level 2 SFRA where appropriate, or deferred to the planning application stage. At that point, site-specific FRAs will incorporate the best available local data and involve consultation with relevant stakeholders and infrastructure providers to ensure that risks are appropriately understood and mitigated.
- 5.13 In addition, other sources of flood risk are considered qualitatively through the SFRA site-screening process. This includes an integrated review of surface water flood risk (including climate change allowances), potential groundwater emergence, site access and egress during flood events, and local drainage characteristics. Together, these factors contribute to a comprehensive understanding of flood risk and inform the wider SFRA evidence base supporting the Local Plan.

## **Consideration of Climate Change**

### **Fluvial Flood Risk**

- 5.14 Fluvial and tidal flood risk has been assessed using the Environment Agency's Flood Map for Planning, alongside the detailed modelling and datasets applied through the SFRA.
- 5.15 Where available, detailed hydraulic modelling has been used to provide a more refined understanding of flood risk, including the 1% AEP (1 in 100-year) and 0.1% AEP (1 in 1,000-year) events.

5.16 Flood Zone 3b (functional floodplain) has been identified using the best available modelling data, as set out in the SFRA.

5.17 To understand the potential impacts of climate change, fluvial flood risk has been assessed using the Environment Agency's Rivers and Sea flood risk extents with climate change allowances, with the central allowance for the 2080s epoch (2070–2121) applied in accordance with national guidance. This approach is applied through the SFRA.

### **Surface Water Flood Risk**

5.18 Surface water flood risk has been assessed using the Environment Agency's Risk of Flooding from Surface Water mapping, including the: 3.3% AEP (1 in 30-year) event and 1% AEP (1 in 100-year) event.

5.19 To account for climate change, uplifts have been applied in accordance with the Environment Agency's 2022 climate change allowances. This includes the 3.3% AEP plus 35% climate change allowance and the 1% AEP plus 45% climate change allowance.

5.20 These assumptions and datasets are applied through the SFRA to ensure a consistent assessment of future flood risk.

### **Application to Site Selection**

5.21 The outputs of this work have informed both the Level 1 SFRA site screening (Regulation 18 stage) and the Level 2 SFRA assessment (Regulation 19 stage).

5.22 The Sequential Test therefore draws on the findings of the SFRA, rather than duplicating technical analysis, to provide a consistent understanding of how fluvial and surface water flood risk – including the effects of climate change – may influence site suitability over the lifetime of development

5.23 The Sequential Test has been applied having regard to the availability of reasonably available alternative sites and their relative flood risk, drawing on the site selection process (including the SHELAA), in accordance with national policy (see Section 4).

5.24 The area of search for reasonably available alternative sites reflects the spatial strategy of the Local Plan and the scope of sites assessed through the SHELAA, having regard to the type, scale and locational requirements of development.

- 5.25 A proportionate approach has been applied to the Sequential Test, having regard to the findings of the SFRA and the outcomes of the site selection process.
- 5.26 A number of allocations within the Local Plan are carried forward from the adopted development plan (ADMP sites), including town centre sites and previously developed land allocations. These sites have been considered at a strategic level, drawing on the findings of the SFRA and the wider site selection process.
- 5.27 As these allocations are located within Flood Zone 1, or within established urban areas where flood risk is not a determining constraint, they have not been subject to detailed Level 2 SFRA assessment.
- 5.28 The Council is satisfied that these carried-forward allocations remain sequentially appropriate. Any localised flood risk considerations, including surface water flood risk where relevant, will be addressed through site-specific Flood Risk Assessments and appropriate mitigation at the planning application stage.

### **Relationship Between Sequential and Exception Tests**

- 5.29 The Sequential Test and Exception Test are separate requirements of national policy and are applied independently.
- 5.30 The Sequential Test seeks to direct development to areas of lowest flood risk, either through site selection or by locating development within the lowest-risk parts of a site.
- 5.31 Where a site is located wholly within Flood Zone 1, it is considered to have passed the Sequential Test, as it is situated within the area of lowest flood risk in accordance with national policy.
- 5.32 The Exception Test is required only where 'more vulnerable' development is proposed on sites that include areas of Flood Zone 3a. For these sites, the Sequential Test has been passed because development can be steered to areas of lower flood risk within the site; however, national policy requires the Exception Test to be applied separately due to the vulnerability classification of the proposed use and the presence of Flood Zone 3a. The Level 2 SFRA screening has identified six such sites, and the Exception Test is applied at plan-making stage to confirm that both Part A (wider sustainability benefits) and Part B (ability to be made safe in principle) can be satisfied at a strategic level.

5.33 Passing the Sequential Test does not remove the requirement for the Exception Test, where this is triggered by the vulnerability classification of development and the presence of Flood Zone 3a.

5.34 The initial outcomes of the Level 2 SFRA screening has identified a number of sites where the Exception Test is required. This is addressed separately from the Sequential Test. The Sequential Test does not determine whether the Exception Test is required, nor does it imply that a site is acceptable in flood risk terms without further assessment.

5.35 At plan-making stage, the role of the Exception Test is to confirm that the test can be met *in principle*, and that there is no strategic reason why the allocation cannot be made safe for its intended use. In accordance with national policy, the Exception Test comprises two parts:

- Part A, which requires wider sustainability benefits to the community; and
- Part B, which requires the development to be capable of being made safe for its lifetime without increasing flood risk elsewhere.

5.36 At Local Plan stage, both parts are applied at a high level, with detailed assessment deferred to planning application stage through site-specific FRAs.

## Presentation of Findings

5.37 The Sequential Test presents a consistent summary for each allocation site, including:

- Site reference;
- Site address;
- Settlement;
- Allocation type;
- Sources of flood risk; and
- Commentary explaining the Sequential Test outcome and the nature and extent of any identified risks.

5.38 The proposed use or allocation type has been identified because the Sequential Test considers whether there are reasonably available lower-risk alternatives for the same type, scale and role of development. For sites wholly within Flood Zone 1, the proposed use does not alter the Sequential Test outcome, as these sites are located in the area of lowest fluvial flood risk. However, identifying the proposed use

provides transparency and supports the assessment of vulnerability classification where this is relevant.

- 5.39 For sites containing Flood Zone 2 and/or Flood Zone 3, the proposed use is relevant to determining whether the Exception Test is required. In particular, residential development and other 'more vulnerable' uses are identified where the allocation contains Flood Zone 3a. Where such uses are proposed, the Exception Test is applied separately from the Sequential Test.
- 5.40 This approach provides a clear and proportionate way of demonstrating that all relevant sources of flood risk have been considered at allocation stage.
- 5.41 For clarity, sites are presented in two tables:
- Sites wholly within Flood Zone 1; and
  - Sites containing areas of Flood Zone 2 and/or Flood Zone 3.
- 5.42 Sites in the second group are treated as being within the higher Flood Zone for the purposes of the Sequential Test, in accordance with the precautionary approach set out above, regardless of the extent of flood risk within the site.
- 5.43 The Level 2 SFRA screening has identified six allocation sites where the Exception Test is required. The need for the Exception Test arises from the proposed vulnerability classification of the intended use (e.g. 'more vulnerable' residential development) and the presence of areas of Flood Zone 3a within the site boundaries. In accordance with national policy, the Exception Test is required even where the Sequential Test has been passed, as the two tests serve distinct purposes.
- 5.44 The Exception Test is presented in a consistent format for these six sites. For each site, the following information is summarised:
- The reason the Exception Test is required, including the relevant flood zone and vulnerability classification;
  - Consideration of wider sustainability benefits of the development (Part A);
  - An in-principle assessment of whether the site can be made safe for its lifetime, without increasing flood risk elsewhere (Part B); and
  - The overall Exception Test outcome at plan-making stage.
- 5.45 At this stage of plan-making, the Exception Test is applied proportionately, focusing on whether there is a reasonable prospect that both parts of the test can be satisfied. In particular, Part B is considered at a high level, informed by Level 2 SFRA evidence, to determine whether

the site is capable, in principle, of being made safe for its lifetime.

- 5.46 Detailed technical assessment is not required at this stage. Instead, the Exception Test is informed by the available and evolving flood risk evidence base, together with site-specific characteristics, to determine whether safe and suitable development is likely to be achievable.
- 5.47 For these sites, the flooding risk and constraints will be addressed in detail at planning application stage through a site-specific Flood Risk Assessment, supported by Level 2 SFRA recommendations. This will demonstrate that the development will be safe for its lifetime, without increasing flood risk elsewhere, and will deliver wider sustainability benefits in line with national policy.

## Evidence Base

- 5.48 The Sequential and Exception Tests are informed by the Strategic Flood Risk Assessment (SFRA), comprising both Level 1 and Level 2 studies.
- 5.49 The Level 1 SFRA provides a strategic overview of flood risk across the district, identifying the extent and nature of flood risk from all sources. It establishes the baseline evidence for plan-making and includes an initial screening of potential allocation sites (including Regulation 18 sites) to identify those affected by flood risk and inform the application of the Sequential Test.
- 5.50 Building on this, the Level 2 SFRA provides a more detailed, site-specific assessment where required. This includes further screening of sites taken forward through the plan-making process (including Regulation 19 sites), with a particular focus on those at greater risk of flooding. For the most constrained sites, detailed site proformas are prepared, setting out the nature of flood risk, key considerations, and the potential for mitigation.
- 5.51 The Level 2 SFRA forms part of the Council's evolving evidence base and is used to inform site selection and the application of the Exception Test at this stage. It provides a proportionate level of detail appropriate to plan-making, with further technical assessment to be undertaken, where necessary, at the planning application stage.
- 5.52 Together, these studies provide a proportionate and robust evidence base to support the application of the Sequential and Exception Tests, ensuring that flood risk is appropriately considered throughout the plan-making process.

## 6. Applying the Sequential Test

- 6.1 Officers have applied the Sequential Test to the proposed site allocations (housing, employment, mixed-use and Gypsy and Traveller pitches) in the Local Plan, based on the findings of the SFRA Level 1 and 2 and the results of the assessment are set out below:
- 6.2 A total of 91 proposed allocations are wholly located within Flood Zone 1. In accordance with national policy, these sites satisfy the Sequential Test. Variations in surface water flood risk within these sites do not affect the Sequential Test outcome and will instead be addressed, where necessary, through site-specific Flood Risk Assessments at the planning application stage.
- 6.3 A further group of 6 sites include small or localised areas of Flood Zone 2 or Flood Zone 3. In these cases, the areas of flood risk are sufficiently limited that they can be avoided through the application of a sequential approach to site layout and design, in accordance with national and local planning policy. On this basis, the Sequential Test is considered to be satisfied at the plan-making stage.
- 6.4 The remaining 6 sites include more extensive areas of Flood Zone 2 and/or Flood Zone 3 and may require further assessment through the Exception Test where this is triggered by the vulnerability classification of the proposed use and the presence of Flood Zone 3a. These sites are assessed in Section 7.
- 6.5 Tables 1 and 2 set out the results of the Sequential Test. Table 1 presents sites wholly within Flood Zone 1, while Table 2 presents sites containing areas of Flood Zone 2 and/or Flood Zone 3.

**Table 1: Proposed Allocation Sites wholly within Flood Zone 1**

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
EMP2-2	Land at Bartram Farm and adjacent to Vestry Road	Sevenoaks Urban Area	Employment	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-3	Land rear of Bowerwood House, 15 St Botolphs Road	Sevenoaks Urban Area	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-1	Land north of Barnett Field, Blackhall Lane, Sevenoaks	Sevenoaks Urban Area	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-5	Brittains Lane, Kippington, Sevenoaks	Sevenoaks Urban Area	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
EMP2-1	Bakers Yard, Otford Road, Sevenoaks	Sevenoaks Urban Area	Employment	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-5	Pinetops, 5 Crownfields	Sevenoaks Urban Area	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-2	Land at the Croft, Bradbourne Vale Road	Sevenoaks Urban Area	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-2	Garages off Hillingdon Avenue	Sevenoaks Urban Area	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST2-1	9 Clare Way, Sevenoaks	Sevenoaks Urban Area	Housing	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST2-10	Land east of High Street, Sevenoaks	Sevenoaks Urban Area	Mixed-use	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST2-9	Station Car Park, Morewood Close	Sevenoaks Urban Area	Mixed-use	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST4-6	Land east of London Road, Dunton Green	Sevenoaks Urban Area	Mixed-use	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST2-11	160 London Road, Sevenoaks	Sevenoaks Urban Area	Mixed-use	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST2-6	Land at Cramptons Road, Sevenoaks	Sevenoaks Urban Area	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-7	109-119 St Johns Hill, Sevenoaks	Sevenoaks Urban Area	Mixed-use	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST2-8	Sevenoaks Station, London Road	Sevenoaks Urban Area	Mixed-use	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-16	Garages, Conifer Way	Swanley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-19	Media House, Azalea Drive, Swanley	Swanley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-11	Parkwood Hall Co-operative Academy, Beechenlea Lane, Swanley	Swanley	Mixed-use	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-13	Land north of Moultain Hill, Swanley	Swanley	Mixed-use	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-12	Land north of Maidstone Road, Swanley	Swanley	Mixed-use	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-13	Gulf Petrol Station off London Road	Swanley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-17	Garages off Russett Way	Swanley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST2-15	Garages south of Alder Way	Swanley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-14	Garages north of Conifer Way	Swanley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-10	Land north of railway line and west of Beechenlea Lane, Swanley	Swanley	Housing	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST4-8	Land at Lullingstone Avenue, Swanley	Swanley	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-18	Whiteoak Garage off London Road	Swanley	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
GT1-1	Seven Acres Farm, Edenbridge	Edenbridge	Gypsy and Traveller	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-14	Land at Lingfield Road, Edenbridge	Edenbridge	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-15	Land west of Ashcombe Drive and Meadow Lane, Edenbridge	Edenbridge	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST2-27	Edenbridge War Memorial Hospital	Edenbridge	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-19	Land at Crouch House Road, Edenbridge	Edenbridge	Housing	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST2-23	Garage courts to the north of The Plat	Edenbridge	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-25	Land north of Springfield Road, Edenbridge	Edenbridge	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-24	Land east of Cedar Drive, Edenbridge	Edenbridge	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-29	Currant Hill Allotments, Westerham	Westerham	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-28	Garage courts off Ash Road	Westerham	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-3	Orchard Farm, Fawkham Road, Longfield, Kent	Hartley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST4-23	Land adjacent to Bancksides and Downs Valley, Hartley	Hartley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-2	Fawkham Business Park, Fawkham Road, Fawkham	Hartley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-1	Land at Ash Road, Hartley	Hartley	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
EMP2-5	Hartley Breakers Yard, Hartley Bottom Road	Hartley	Employment	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
ST2-30	Ryecroft, Ryecroft Road, Otford	Otford	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-24	Land west of Hale Lane, Otford	Otford	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-22	Grosvenor, Church Road, Hartley	New Ash Green	Housing	None	P Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-25	Land west of New Ash Green	New Ash Green	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST2-31	The Forge, Ash	New Ash Green	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-21	Melsetta, Church Road, Hartley	New Ash Green	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-26	Land South of Redhill Road, New Ash Green	New Ash Green	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-34	Richardsons Farm, West Kingsdown	West Kingsdown	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-40	Land East of Fawkham Road West Kingsdown	West Kingsdown	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-42	Land at London Road, West Kingsdown	West Kingsdown	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-30	Land on the south side of West End, Kemsing	Kemsing	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-33	Land west of Park Lane, Kemsing	Kemsing	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST4-33	Land at Childsbridge Lane, Kemsing	Kemsing	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-41	Land to the west of Childsbridge Lane, Kemsing	Kemsing	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-5	The Cottage and associated land, Holmesdale Road, South Darent	South Darent	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-27	Land east of Gorrige Avenue, Southdowns	South Darent	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-4	Land north of Gorrige Avenue, Southdowns	South Darent	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-37	Land north of Rabbits Road, South Darent	South Darent	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-36	Land south of Prince Charles Avenue, Southdowns, South Darent	South Darent	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST4-29	Land south of garages, Prince Charles Avenue, Southdowns, South Darenth	South Darenth	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-28	Land south of Victoria Drive, Southdowns, South Darenth	South Darenth	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST5-1	Broke Hill Golf Course, Halstead, Sevenoaks	Pratts Bottom	Mixed-use	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
GT1-4	Goss Hill Lodge, Clement Street, Hextable	Hextable	Gypsy and Traveller	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-35	Land west of College Cottages, Hextable	Hextable	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-39	Land south of Lower Road, Hextable	Hextable	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-31	Land adjacent 72 Lower Road, Hextable	Hextable	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-32	Land at 70 Lower Road, Hextable	Hextable	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST4-38	Land adjacent Puddledock Lane, Top Dartford Road, Hextable	Hextable	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-6	Former Oasis Academy, 37 Egerton Avenue, Hextable	Hextable	Housing	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST4-43	Meadow View (aka Fen's Farm), Top Dartford Road, Hextable	Hextable	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
GT1-2	Station Court, Sevenoaks Road, Halstead	Halstead	Gypsy and Traveller	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-9	Land west of Beaumont Yard, Crow Drive, Halstead	Halstead	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-7	Highfield Farm & Knocka Villa, Crow Drive, Halstead, TN14 7BW	Halstead	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST2-34	Land south of Parkside and Southdene, Halstead	Halstead	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-8	Helipad Site, Crow Drive, Fort Halstead	Halstead	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
EMP2-6	Elliott's Farm, Rogues Hill	Penshurst	Employment	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-10	The Highways Depot, Tonbridge Road, Chiddingstone Causeway	Chiddingstone Causeway	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST4-45	Land to the rear of the Little Brown Jug, Chiddingstone Causeway	Chiddingstone Causeway	Housing	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST3-13	Station Yard, Station Hill, Chiddingstone Causeway	Chiddingstone Causeway	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
EMP2-7	Chelsfield Depot, Shackfields Road	Badgers Mount	Employment	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-15	The Stables at Oakview Stud Farm, Lombard Street, Horton Kirby	Horton Kirby	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-14	Land at Oakview Stud Farm, Lombard Street, Horton Kirby	Horton Kirby	Housing	Surface water (high)	Pass – Site located wholly within Flood Zone 1. Significant surface water flood risk is identified and will be addressed at planning application stage.
EMP2-8	Beechcroft Farm Industries, Chapel Wood Road	Ash	Employment	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
GT1-3	Park Lane Farm, Park Lane, Swanley Village	Swanley Village	Gypsy and Traveller	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST3-11	Old Forge Yard, Swanley Village Road, Swanley Village	Swanley Village	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
EMP2-9	Lower Daltons Nursery. Swanley Village Road	Swanley Village	Employment	Surface water (localised)	Pass – Site located wholly within Flood Zone 1. Localised surface water flood risk is present and will be addressed at planning application stage.
ST3-12	Baldwin's Yard, Noah's Ark, Kemsing	Noahs Ark	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.
ST5-2	Land at Pedham Place	Standalone Settlement	Housing	None	Pass – Site located wholly within Flood Zone 1. No significant fluvial or surface water flood risk identified.

- 6.6 The following table sets out the allocation sites that are not wholly within Flood Zone 1. These sites include areas of Flood Zone 2 or Flood Zone 3a, ranging from small, localised sections within an otherwise Flood Zone 1 site to more substantial areas of higher-risk Flood Zones. In line with national guidance, the Sequential Test treats any presence of Flood Zone 2 or Flood Zone 3 as relevant, regardless of the extent of coverage.
- 6.7 Some sites contain only small, localised areas of Flood Zone 2 or Flood Zone 3, while others include more extensive areas of higher-risk Flood Zones. In all cases, the Sequential Test records the presence of the higher-risk Flood Zone without implying proportionality. Fluvial flood risk will be addressed at planning application stage, with further Level 2 SFRA screening undertaken where evidence indicates that additional assessment is appropriate.
- 6.8 The Sequential Test has been applied to all allocation sites that are not wholly within Flood Zone 1. For the purposes of the test, no reasonably available lower-risk alternative has been identified through the site selection/SHELAA process that could accommodate the same type, scale and role of development, having regard to the Local Plan spatial strategy and the consideration of reasonable alternatives as set out in Section 4. In addition, where flood risk is present within the allocation boundary, the developable area can be directed to the lowest-risk parts of the site through masterplanning, detailed layout and site-specific Flood Risk Assessment. On this basis, the sites listed in Table 2 pass the Sequential Test, subject to site-specific Flood Risk Assessment and detailed design at the planning application stage.
- 6.9 Passing the Sequential Test does not remove the need for further assessment where required by national policy. The Sequential Test and the Exception Test are separate stages of the NPPF flood risk process. Some 'more vulnerable' uses located on sites that include areas of Flood Zone 3a may still require the Exception Test, even where the Sequential Test is passed. The need for the Exception Test is identified through Level 2 SFRA screening and is addressed separately from the Sequential Test.
- 6.10 The table below summarises the allocation type, Flood Zone classification, other sources of flood risk, and the Sequential Test outcome for each site, with accompanying comments describing the nature and extent of identified risks.

**Table 2: Proposed Allocation Sites with Areas of Flood Zone 2 and/or Flood Zone 3**

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
EMP2-3	Land at Old Otford Road and Vestry Trading Estate	Sevenoaks Urban Area	Employment	Fluvial flood risk present (Flood Zone 2 and Flood Zone 3, including areas of Flood Zone 3b)	<p>Pass – The site is predominantly located within Flood Zone 1, with small, localised areas of Flood Zone 2 (5.34%) and Flood Zone 3b (2.95%).</p> <p>Fluvial flood risk is present and will be addressed at planning application stage. Flood Zone 3b, where present, will be excluded from the developable area.</p> <p>No significant surface water flood risk is identified.</p>
ST4-3	Land to the rear of 34 Chipstead Park, Sevenoaks	Sevenoaks Urban Area	Housing	<p>Fluvial flood risk present (Flood Zone 3b)</p> <p>Surface water (localised)</p>	<p>Pass – Site is predominantly located within Flood Zone 1, with a small, localised area of Flood Zone 3b (0.12%).</p> <p>Fluvial flood risk is present and will be addressed at planning application stage. Flood Zone 3b, where present, will be excluded from the developable area.</p> <p>Surface water flood risk is identified and will be addressed at planning application stage.</p>
EMP2-4	Land west of Old Otford Road	Sevenoaks Urban Area	Employment	Fluvial flood risk present (Flood Zone 2 and Flood Zone 3b)	<p>Pass – Site is predominantly located within Flood Zone 1, with substantial areas of Flood Zone 2 (12.64%) and Flood Zone 3b (8.79%) also present.</p> <p>Fluvial flood risk is present and will be addressed at planning application stage. Flood</p>

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
					<p>Zone 3b, where present, will be excluded from the developable area.</p> <p>No significant surface water flood risk is identified.</p>
ST2-4	Abacus Furniture, Farm Road Garages	Sevenoaks Urban Area	Housing	<p>Fluvial flood risk present (Flood Zone 2 and Flood Zone 3, including Flood Zone 3b)</p> <p>Surface water (high)</p>	<p>Pass – Site is predominantly located within Flood Zone 1, with substantial areas of Flood Zone 2 (18.68%) and Flood Zone 3 (8.31%), including 7.35% within Flood Zone 3b, is also present.</p> <p>Fluvial flood risk is present and will be addressed at planning application stage.</p> <p>Significant surface water flood risk is identified and will be addressed at planning application stage.</p> <p>The initial findings of the Level 2 SFRA identifies that the Exception Test is required because the allocation includes ‘more vulnerable’ development and areas of Flood Zone 3a. Flood Zone 3b, where present, will be excluded from the developable area.</p>
ST4-4	Land west of Brittain's Lane, Sevenoaks	Sevenoaks Urban Area	Housing	<p>Fluvial flood risk present (Flood Zone 2 and Flood Zone 3, including Flood Zone 3b)</p>	<p>Pass – Site is predominantly located within Flood Zone 1, with substantial areas of Flood Zone 2 (1.96%) and Flood Zone 3 (13.21%) including 12.13% within Flood Zone 3b, is also present.</p>

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
					<p>Fluvial flood risk is present and will be addressed at planning application stage.</p> <p>No significant surface water flood risk is identified.</p> <p>The initial findings of the Level 2 SFRA screening identifies that the Exception Test is required because the allocation includes 'more vulnerable' development and areas of Flood Zone 3a and 3b. Flood Zone 3b, where present, will be excluded from the developable area.</p>
ST4-7	Land north of Sevenoaks, west of Otford Road	Sevenoaks Urban Area	Housing	Fluvial flood risk present (Flood Zone 2 and Flood Zone 3, including Flood Zone 3b)	<p>Pass - Site is predominantly located within Flood Zone 1, with substantial areas of Flood Zone 2 (11.71%) and Flood Zone 3 (23.87%), including 18.92% within Flood Zone 3b, is also present.</p> <p>Fluvial flood risk is present and will be addressed at planning application stage. No significant surface water flood risk is identified.</p> <p>The initial findings of the Level 2 SFRA screening identifies that the Exception Test is required because the allocation includes 'more vulnerable' development and areas of Flood Zone 3a. Flood Zone 3b, where present, will be excluded from the developable area.</p>

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
ST4-16	Land west of Lingfield Road Recreation Ground and East of Skeynes Farm Cotts, Lingfield Road, Edenbridge	Edenbridge	Housing	Fluvial flood risk present (Flood Zone 2)  Surface water (high)	Pass – Site is predominantly located within Flood Zone 1, with a small, localised area of Flood Zone 2 (0.47%).  Fluvial flood risk is present and will be addressed at planning application stage.  Significant surface water flood risk is identified and will be addressed at planning application stage.
ST4-18	Land north of Skinners Lane, Edenbridge	Edenbridge	Housing	Fluvial flood risk present (Flood Zone 2 and Flood Zone 3, including areas of Flood Zone 3b)	Pass – Site is predominantly located within Flood Zone 1, with a small, localised area of Flood Zone 2 (0.69%) and Flood Zone 3 (2.02%) including 1.85% within Flood Zone 3b.  Fluvial flood risk is present and will be addressed at the planning application stage. Flood Zone 3b, where present, will be excluded from the developable area.  No significant surface water flood risk is identified.
ST4-17	Land south west of Skinners Farm, Edenbridge	Edenbridge	Housing	Fluvial flood risk present (Flood Zone 2 and Flood Zone 3)	Pass – Site is predominantly located within Flood Zone 1, with substantial areas of Flood Zone 2 (37.53%) and Flood Zone 3 (1.09%) also present.  Fluvial flood risk is present and will be addressed at planning application stage. No significant surface water flood risk is identified.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
					The initial findings of the Level 2 SFRA screening identifies that the Exception Test is required because the allocation includes 'more vulnerable' development and areas of Flood Zone 3a. Flood Zone 3b, where present, will be excluded from the developable area.
ST4-20	Land at Breezehurst Farm, Crouch House Road	Edenbridge	Mixed-use	Fluvial flood risk present (Flood Zone 2 and Flood Zone 3, including Flood Zone 3b)  Surface water (localised)	Pass – Site is predominantly located within Flood Zone 1, with substantial areas of Flood Zone 2 (2.23%) and Flood Zone 3 (9.37%), including 8.55% within Flood Zone 3b, also present.  Fluvial flood risk is present and will be addressed at planning application stage. Surface water flood risk is identified and will be addressed at planning application stage.  The initial findings of the Level 2 SFRA screening identifies that the Exception Test is required because the allocation includes 'more vulnerable' development and areas of Flood Zone 3a. Flood Zone 3b, where present, will be excluded from the developable area.
ST2-26	78-80 and 82-84 High Street, Leathermarket, Edenbridge	Edenbridge	Mixed-use	Fluvial flood risk present (Flood Zone 2 and 3)  Surface water (localised)	Pass – Site is predominantly located within Flood Zone 2, with a substantial area of Flood Zone 3 (23.30%) also present.  Fluvial flood risk is present and will be addressed at planning application stage.

Site Reference	Site Address	Settlement	Allocation Type	Sources of Flood Risk	Sequential Test Outcome and Comments
					<p>Surface water flood risk is identified and will be addressed at planning application stage.</p> <p>The initial findings of the Level 2 SFRA screening identifies that the Exception Test is required because the allocation includes 'more vulnerable' development and areas of Flood Zone 3a. Flood Zone 3b, where present, will be excluded from the developable area.</p>
ST4-44	Land at Horton Road, South Darent	South Darent	Mixed-use	Fluvial flood risk present (Flood Zone 2)	<p>Pass - Site is predominantly located within Flood Zone 1, with a small, localised area of Flood Zone 2 (0.05%).</p> <p>Fluvial flood risk is present and will be addressed at planning application stage.</p> <p>No significant surface water flood risk is identified.</p>

## Conclusion

- 6.11 The Sequential Test has been applied across the District, having regard to the availability of reasonably available alternative sites and their relative flood risk, drawing on the wider site selection process (including the SHELAA).
- 6.12 Sites located wholly within Flood Zone 1 are considered to have passed the Sequential Test, as they are situated within areas of lowest flood risk in accordance with national policy.
- 6.13 Where sites include limited areas of Flood Zone 2 and/or Flood Zone 3, the Sequential Test is considered to be satisfied where development can be directed to the lowest risk parts of the site and where there are no reasonably available sites at lower risk capable of accommodating the identified development needs.
- 6.14 Other sources of flood risk, including surface water, groundwater, sewer, and reservoir flooding, have been considered as part of the SFRA evidence base. These do not influence Flood Zone classification or the application of the Sequential Test but will be addressed, where relevant, through site-specific Flood Risk Assessments at the planning application stage.
- 6.15 On this basis, all allocation sites included within the Local Plan are considered to have passed the Sequential Test in accordance with national policy.

## 7. Applying the Exception Test

- 7.1 The Level 2 SFRA screening has identified six allocation sites where the Exception Test is required, based on the proposed vulnerability classification of the intended use and the presence of Flood Zone 3a within the site. At plan-making stage, the role of the Exception Test is to confirm that the test can be met in principle, and that there is no strategic reason why the allocation cannot be made safe for its intended use.
- 7.2 A number of allocation sites include areas of Flood Zone 3a and Flood Zone 3b within their wider boundaries. Flood Zone 3b (functional floodplain) is not suitable for 'more vulnerable' development, and the developable areas of all allocations have been defined to exclude land within Flood Zone 3b. The presence of Flood Zone 3b within a site boundary therefore does not trigger the Exception Test, provided that development is located entirely outside this zone.
- 7.3 The Exception Test is required only where 'more vulnerable' development is proposed on sites that include areas of Flood Zone 3a. For these sites, the Sequential Test has been passed, but national policy requires the Exception Test to be applied separately due to the vulnerability classification of the proposed use and the presence of Flood Zone 3a.
- 7.4 For these sites, the Exception Test will be addressed in detail at planning application stage through a site-specific Flood Risk Assessment, supported by Level 2 SFRA analysis where appropriate. This will demonstrate that the development can be made safe for its lifetime, without increasing flood risk elsewhere, and will deliver wider sustainability benefits in line with national policy.
- 7.5 The following sites are identified as requiring the Exception Test:
1. Abacus Furniture, Farm Road Garages
  2. Land south west of Skinners Farm, Edenbridge
  3. Land west of Brittain's Lane, Sevenoaks
  4. Land north of Sevenoaks, west of Otford Road
  5. Land at Breezehurst Farm, Crouch House Road
  6. 78-80 and 82-84 High Street, Leathermarket, Edenbridge
- 7.6 The Exception Test is required for six allocation sites due to the combination of the proposed 'more vulnerable' use and the presence of Flood Zone 3a within the site boundaries. The tables below set out how the Exception Test is applied to each site at plan-making stage.

## Abacus Furniture, Farm Road Garages

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
<p>More vulnerable development proposed in Flood Zone 3a.</p>	<p>The site aligns with the Development Strategy and the NPPF requirement to prioritise the reuse of brownfield land. It is in a highly sustainable location and provides an opportunity to redevelop previously-used land in a way that embeds climate-change mitigation measures, including sustainable drainage (SuDS).</p> <p>The site will contribute to meeting the District's acute housing need supporting the Local Plan's housing requirement and helping to address identified shortfalls in supply.</p> <p>The development will also deliver wider community benefits through Section 106 contributions, helping to secure infrastructure needed to mitigate the impacts of the site and support the local area.</p>	<p>The site contains areas of Flood Zone 2 and Flood Zone 3. However, the majority of the site lies within Flood Zone 1. The detailed layout will be informed by a site-specific Flood Risk Assessment to ensure that the most vulnerable elements of the development are directed to the lowest-risk areas where feasible.</p> <p>The Level 2 SFRA does not identify any strategic constraints that would prevent the site from being made safe. A site-specific Flood Risk Assessment will be required at planning application stage to demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, and to confirm appropriate mitigation measures.</p>	<p>Based on the wider sustainability benefits (Part A) and the conclusion that the site can be made safe in principle subject to a site-specific FRA (Part B), the development can be considered suitable for allocation in the Local Plan.</p>

## Land south west of Skinners Farm, Edenbridge

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
<p>Flood Zone 3a extends into north western corner of site.</p>	<p>The site aligns with the Development Strategy and is located in a sustainable settlement where growth is supported. It provides an opportunity to deliver a well-integrated greenfield development that incorporates climate-change mitigation measures, including sustainable drainage (SuDS), green infrastructure and biodiversity enhancements.</p> <p>The site will contribute to meeting the District's acute housing need, supporting the Local Plan's housing requirement and helping to address identified shortfalls in supply, including the delivery of affordable homes.</p> <p>The development will also deliver wider community benefits through Section 106 contributions, helping to secure infrastructure needed to mitigate the impacts of the site and support the local area.</p>	<p>The site contains areas of Flood Zone 2 and a small portion of Flood Zone 3. However, the majority of the site lies within Flood Zone 1. The detailed layout will be informed by a site-specific Flood Risk Assessment to ensure that the most vulnerable elements of the development are directed to the lowest-risk areas where feasible.</p> <p>The Level 2 SFRA does not identify any strategic constraints that would prevent the site from being made safe. A site-specific Flood Risk Assessment will be required at planning application stage to demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, and to confirm appropriate mitigation measures.</p>	<p>Based on the wider sustainability benefits (Part A) and the conclusion that the site can be made safe in principle subject to a site-specific FRA (Part B), the development can be considered suitable for allocation in the Local Plan.</p>

## Land west of Britains Lane, Sevenoaks

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
<p>More vulnerable development is proposed on an allocation containing Flood Zone 3a and Zone 3b.</p>	<p>The site aligns with the Development Strategy and is located within the District's most sustainable settlement, where planned growth is supported. It provides an opportunity to deliver a well-integrated development that incorporates climate-change mitigation measures, including SuDS, green infrastructure and biodiversity enhancements. Development in this location will support existing services and facilities and reduce the need to travel by private car.</p> <p>The site will contribute to meeting the District's acute housing need, supporting the Local Plan's housing requirement and helping to address identified shortfalls in supply, including the delivery of affordable homes.</p> <p>The development will also deliver wider community benefits through Section 106 contributions, helping to secure</p>	<p>The site contains areas of Flood Zone 2 and Flood Zone 3. However, the majority of the site lies within Flood Zone 1. The detailed layout will be informed by a site-specific Flood Risk Assessment to ensure that the most vulnerable elements of the development are directed to the lowest-risk areas where feasible and that Flood Zone 3b, where present, will be excluded from the developable area.</p> <p>The Level 2 SFRA does not identify any strategic constraints that would prevent the site from being made safe. A site-specific Flood Risk Assessment will be required at planning application stage to demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, and to confirm appropriate mitigation measures.</p>	<p>Based on the wider sustainability benefits (Part A) and the conclusion that the site can be made safe in principle subject to a site-specific FRA (Part B), the development can be considered suitable for allocation in the Local Plan.</p>

<b>Reasons for Exception Test</b>	<b>Sustainability Benefits (Part A)</b>	<b>Can the site be made safe in principle? (Part B)</b>	<b>Outcome</b>
	infrastructure needed to mitigate the impacts of the site and support the local area.		

## Land north of Sevenoaks, west of Otford Road

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
<p>More vulnerable development is proposed on an allocation containing Flood Zone 3a and 3b.</p>	<p>The site aligns with the Development Strategy and is located within the District's most sustainable settlement, where planned growth is supported. Its strategic scale provides an opportunity to deliver a comprehensively masterplanned development that incorporates climate-change mitigation measures from the outset, including SuDS, green infrastructure and biodiversity enhancements. The site is bounded by Dunton Green train station to the west, offering convenient access to sustainable transport and reducing the need to travel by private car.</p> <p>The site will make a significant contribution to meeting the District's acute housing need, supporting the Local Plan's housing requirement and helping to address identified shortfalls in supply, including the delivery of affordable homes. Its scale enables a balanced mix of</p>	<p>The site contains areas of Flood Zone 2 and Flood Zone 3. However, the majority of the site lies within Flood Zone 1. The detailed layout will be informed by a site-specific Flood Risk Assessment to ensure that the most vulnerable elements of the development are directed to the lowest-risk areas where feasible and that Flood Zone 3b, where present, will be excluded from the developable area.</p> <p>The Level 2 SFRA does not identify any strategic constraints that would prevent the site from being made safe. A site-specific Flood Risk Assessment will be required at planning application stage to demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, and to confirm appropriate mitigation measures.</p>	<p>Based on the wider sustainability benefits (Part A) and the conclusion that the site can be made safe in principle subject to a site-specific FRA (Part B), the development can be considered suitable for allocation in the Local Plan.</p>

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
	<p>uses to be planned as part of the development, including community, leisure and open-space provision, helping to create a well-integrated neighbourhood that supports existing services and facilities.</p> <p>The development will also deliver wider community benefits through Section 106 contributions, helping to secure infrastructure needed to mitigate the impacts of the site and support the local area.</p>		

## Land at Breezehurst Farm, Crouch House Road

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
<p>More vulnerable development is proposed on an allocation containing Flood Zone 3a and 3b.</p>	<p>The site aligns with the Development Strategy and is located in a sustainable settlement where growth is supported. It provides an opportunity to deliver a well-integrated greenfield development that incorporates climate-change mitigation measures, including sustainable drainage (SuDS), green infrastructure and biodiversity enhancements.</p> <p>The site will contribute to meeting the District's acute housing need, supporting the Local Plan's housing requirement and helping to address identified shortfalls in supply, including the delivery of affordable homes.</p> <p>The development will also deliver wider community benefits through Section 106 contributions, helping to secure infrastructure needed to mitigate the impacts of the site and support the local area.</p>	<p>The site contains areas of Flood Zone 2 and Flood Zone 3. However, the majority of the site lies within Flood Zone 1. The detailed layout will be informed by a site-specific Flood Risk Assessment to ensure that the most vulnerable elements of the development are directed to the lowest-risk areas where feasible and that Flood Zone 3b, where present, will be excluded from the developable area.</p> <p>The Level 2 SFRA does not identify any strategic constraints that would prevent the site from being made safe. A site-specific Flood Risk Assessment will be required at planning application stage to demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, and to confirm appropriate mitigation measures.</p>	<p>Based on the wider sustainability benefits (Part A) and the conclusion that the site can be made safe in principle subject to a site-specific FRA (Part B), the development can be considered suitable for allocation in the Local Plan.</p>

## 78-80 and 82-84 High Street, Leathermarket, Edenbridge

Reasons for Exception Test	Sustainability Benefits (Part A)	Can the site be made safe in principle? (Part B)	Outcome
<p>Flood Zone 3a extends into north western corner of site.</p>	<p>The site aligns with the Development Strategy and the NPPF requirement to prioritise the reuse of brownfield land. It is in a highly sustainable town-centre location and provides an opportunity to redevelop brownfield land in a way that embeds climate-change mitigation measures, including SuDS, green infrastructure and biodiversity enhancements.</p> <p>The redevelopment of this site forms a key part of the wider regeneration vision for Edenbridge Town Centre, supporting the renewal and revitalisation of the town centre and strengthening its role as a focus for sustainable growth.</p> <p>Its mixed-use nature provides an opportunity to deliver commercial and complementary uses that will enhance the vitality and viability of the town centre, support the local economy and improve the quality of the built environment.</p>	<p>The site lies predominantly within Flood Zone 2, with some areas of Flood Zone 3.</p> <p>Given that the precise form and vulnerability classification of development (including use class) will be determined at the application stage, the site is nevertheless considered capable of accommodating an appropriate form of development that can be made safe for its lifetime.</p> <p>A site-specific Flood Risk Assessment will be required at planning application stage. This will inform the detailed layout and identify the mitigation measures needed to ensure the development can be made safe for its lifetime without increasing flood risk elsewhere. This will include applying a sequential approach within the site to locate the most vulnerable uses in the areas of lowest flood risk where feasible, alongside establishing appropriate finished floor levels, ensuring safe access and egress, and identifying surface-water management measures.</p>	<p>Based on the wider sustainability benefits (Part A) and the conclusion that the site can be made safe in principle subject to a site-specific FRA (Part B), the development can be considered suitable for allocation in the Local Plan.</p>

<b>Reasons for Exception Test</b>	<b>Sustainability Benefits (Part A)</b>	<b>Can the site be made safe in principle? (Part B)</b>	<b>Outcome</b>
	The development will play a central role in delivering the long-term regeneration objectives for the settlement, making efficient use of brownfield land in a highly accessible location.		

## **Conclusion**

7.9 For the six sites where the Exception Test is required, the Council has undertaken a proportionate, in-principle assessment at the plan-making stage.

7.10 This assessment demonstrates that both elements of the Exception Test can be satisfied. In relation to Part A, the proposed allocations deliver wider sustainability benefits to the community, consistent with the spatial strategy of the Local Plan. In relation to Part B, the available evidence indicates that the sites are capable, in principle, of being made safe for their lifetime without increasing flood risk elsewhere.

7.11 Site-specific flood risk considerations and any necessary mitigation will be addressed in detail through Flood Risk Assessments at the planning application stage.

7.12 On this basis, all six sites are considered to satisfy the requirements of the Exception Test in principle, in accordance with national policy.

## **8. Summary and Overall Conclusion**

- 8.1 The Sequential Test has demonstrated that development has been directed to areas of lowest flood risk where reasonably available, in accordance with national policy.
- 8.2 Where required, the Exception Test has been applied proportionately at the plan-making stage and confirms that development can be made safe in principle, while delivering wider sustainability benefits.
- 8.3 On this basis, the proposed allocations are considered to be appropriate in flood risk terms and consistent with national planning policy.