

Proposed Submission Local Plan Flooding Sequential Test

December 2024

Epsom and Ewell
Local Plan 2022-2040



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1. Introduction

- 1.1. This is a procedure document to help evidence how the Epsom and Ewell Local Plan has been prepared in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance in respect of flood risk. The purpose of the document is to demonstrate that sites allocated for development in the plan are suitable for development based on the “Sequential” and “Exception” Tests where it has been necessary to apply them. This takes into account all sources of flood risk, based on data currently available.
- 1.2. The application of the Sequential Test draws upon information gathered and detailed within the Epsom and Ewell Strategic Flood Risk Assessment (SFRA) (2024). The tests were carried out in line with the steps outlined in the NPPF and accompanying technical guidance. It follows examples of best practice as highlighted by the Environment Agency.

2. Strategic Flood Risk Assessment (SFRA)

- 2.1. The NPPF requires that strategic policies should be informed by a SFRA and should manage flood risk from all sources (paragraph 166). More details regarding the requirements pertaining to the SFRA are set out in the Planning Practice Guidance (PPG) and in guidance issued by the Environment Agency.
- 2.2. A [Level 1 SFRA](#) (whole-of-borough) and [Level 2 SFRA](#) (site specific) were produced in 2024 to support the Proposed Submission version of the Epsom and Ewell Local Plan and assess all sources of flooding in the plan area, both now and in the future, as a result of climate change.
- 2.3. The Level 1 SFRA identifies the following core sources of flooding in the borough:

Type of Flood Risk	Summary of coverage in the borough
Fluvial	<p>Concentrated along the Hogsmill River that rises from springs in Ewell and flows through the centre and north-western areas of Epsom and Ewell Borough before entering the Royal Borough of Kingston upon Thames and eventually reaching the River Thames. The River Rye is an ordinary watercourse which runs along the south-western edge of Epsom and Ewell before flowing into the River Mole.</p> <p>The River Rye is an ordinary watercourse which runs along the south-western edge of Epsom and Ewell before flowing into the River Mole. It is designated as a main river at the border of the borough and although it does not enter the borough, some of the fluvial extents affect areas within Epsom and Ewell, for which the risk has been considered.</p>

	For further information on geographical coverage see figures 1 and 2 of the Epsom and Ewell SFRA – Level 1.
Surface Water (pluvial)	<p>Surface water flooding, also known as pluvial flooding, occurs following high-intensity rainfall that triggers ponding or overland flow before water enters a watercourse or underground drainage network.</p> <p>The extent of surface water flood risk varies across the borough with both urban areas and green field (predominantly non developed) areas affected.</p> <p>For further information on geographical coverage see figures 6 to 9 of the Epsom and Ewell SFRA – Level 1.</p>
Groundwater	<p>Groundwater flooding occurs when a rising water table triggers emergence of water through the ground. This can occur for prolonged periods of weeks or months, and often occurs after extensive and protracted heavy rainfall.</p> <p>The Environment Agency produces data that maps area Susceptibility to Groundwater Flooding using a series of 1km² grid squares. For further information on geographical coverage see figure 10 of the Epsom and Ewell SFRA – Level 1.</p>
Sewer Flooding	<p>Sewer flooding can occur as a result of:</p> <ul style="list-style-type: none"> Drainage system failure (such as a collapse or blockage). High water levels blocking or submerging sewer outfall points, resulting in the system backing up and triggering flooding. Increases in water volume and flow entering a sewer system, resulting in an exceedance of the system's hydraulic capacity and subsequent surcharging. These issues can result in flooding due to the overflowing of water from gullies and manholes.
Reservoir	<p>There is one reservoir at Epsom Common Great Pond, which is in the west of the borough. The Environment Agency map the risk of reservoir flooding. For further information see figure 4 of the Epsom and Ewell SFRA – Level 1.</p>

3. Screening for Level 2 SFRA and Sequential /Exception Test Qualification

- 3.1. The Level 2 SFRA considers the flood risk aspects of some of the Proposed Submission site allocations in more detail to establish whether development of these sites can be made safe (while also not increasing flood risk elsewhere).
- 3.2. As part of the screening assessment to determine which sites that to be allocated in the plan required a SFRA Level 2 Assessment to be undertaken, a determination was also made as to whether they would qualify for the “sequential test” and “exception test,” by applying the following key assumptions:

- Only sites within FZ2 or 3a/b would require a Sequential Test. Those with 0% of the site in those flood zones (and therefore, by default, in FZ1) were deemed not to require sequentially testing because forms of flooding other than fluvial (which Flood Zones relate to) that they may be susceptible to (e.g. Surface Water and Ground Water) were considered generally manageable on a site-by-site basis.
- “Highly Vulnerable” sites (as defined by Annexe 3 of the NPPF) within FZ2 would be subject to the Exception Test.
- Essential Infrastructure sites within FZ3a or FZ3b would require an Exception Test.
- More Vulnerable sites within FZ3a would be subject to the Exception Test.

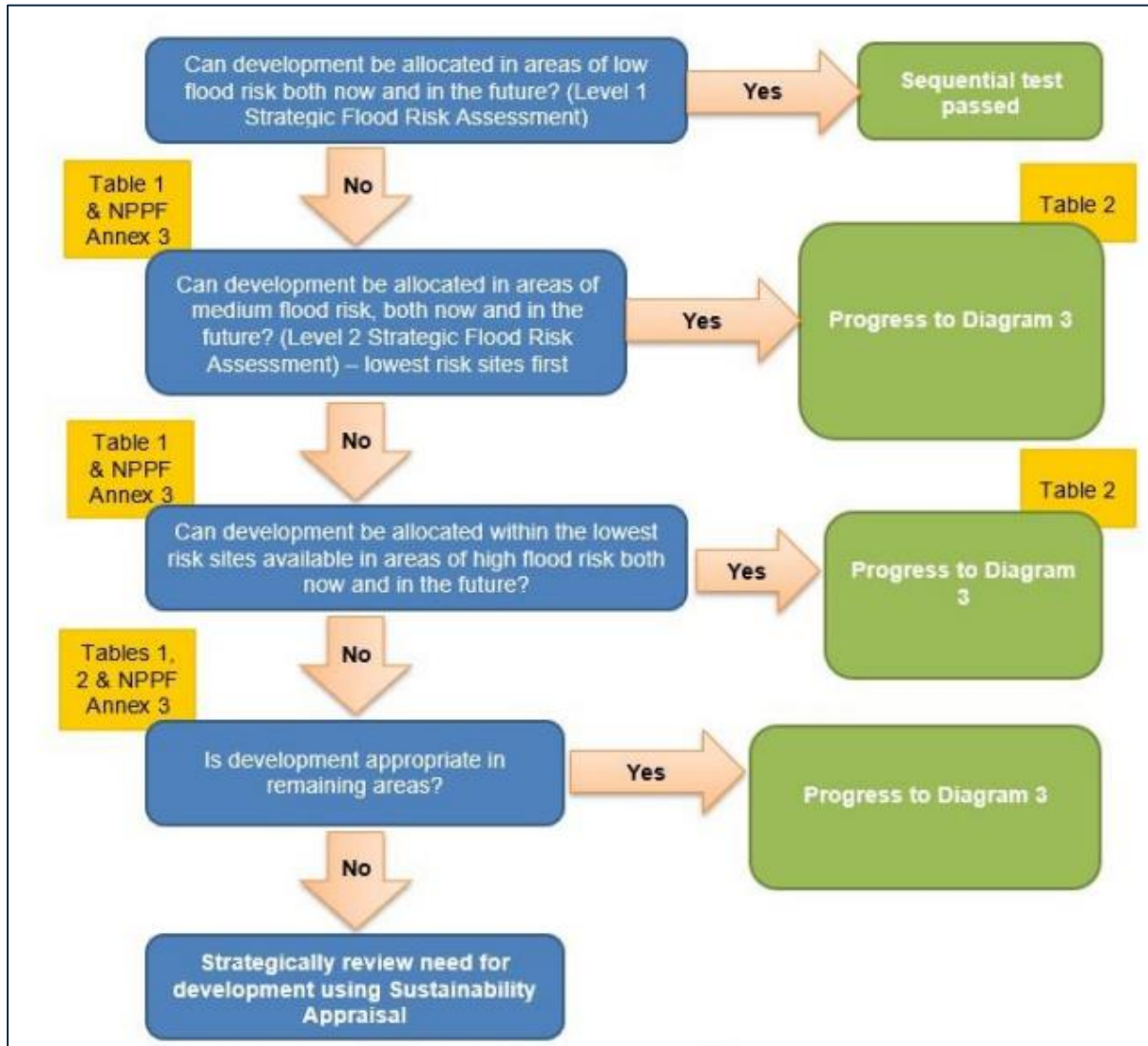
4. The Sequential Test

- 4.1. The NPPF sets out the essential requirements of the Sequential Test in paragraph 162: *“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding”.*
- 4.2. The objective of the test is not to prevent development of land that has higher risk of flooding but rather to ensure that development safely responds to the identified risk and can be sustainably delivered.

Applying the Sequential Test

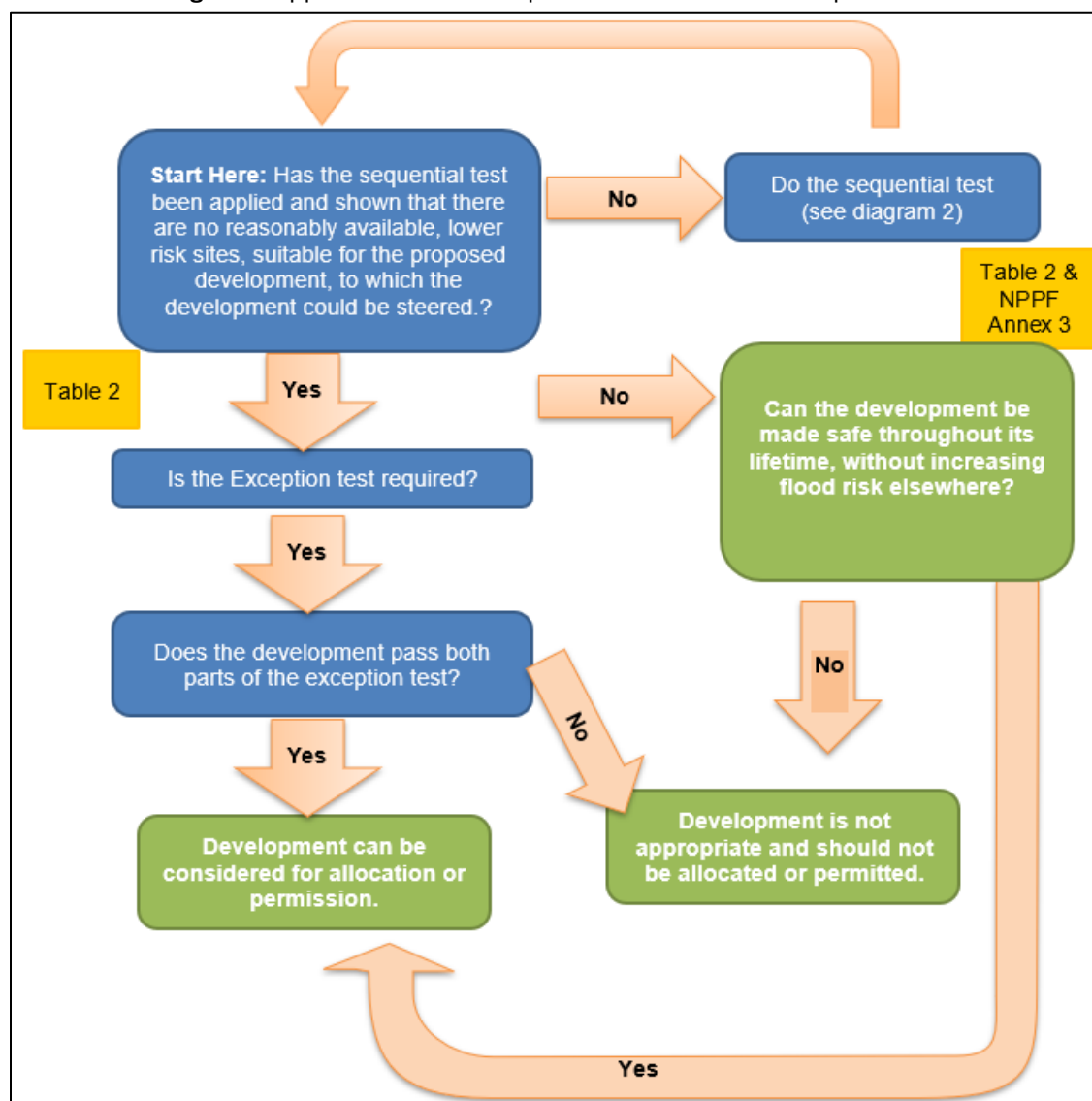
- 4.3. *The process of application of the Sequential test in the preparation of a Local Plan is illustrated in Figures 1 and 2 overleaf.*

Figure 1: Application of the Sequential Test for Local Plan Preparation



Source: Diagram 2 of the Planning Practice Guidance: Flood Risk Assessment and Coastal Change

Figure 2: Application of the Exception Test for Local Plan Preparation



Source: Diagram 3 of the Planning Practice Guidance: Flood Risk Assessment and Coastal Change

- 4.4. Flooding from surface water, groundwater, sewers, reservoirs and other artificial sources are not classified into flood zones.
- 4.5. However, as part of the SFRA, information has been collected on flood risk from all sources, and the Council has seen fit to include surface water and groundwater, flood risk and events in case of reservoir breaches together in this sequential test, in order to ascertain the level of “risk” associated with each site allocation.
- 4.6. The table below sets the scoring criteria applied to each site allocation, to determine its level of flood risk, which, in turn will inform the outcome of the sequential test for each site.

Table 1: Flood Risk Criteria

Overall Risk	Flood Risk Score	Criteria
High	1	Over 1% of the site is within Flood Zone 3
	2	Over 1% of the site is within Flood Zone 2 and/or the modelled fluvial and tidal flood extent.
Medium	3	The site is defined as Flood Zone 1 and over 10% intersects an area at high risk of flooding from surface water (1 in 30) and/or intersects an area with a more than 75% susceptibility to Groundwater Flooding
	4	The site is defined as Flood Zone 1 and over 10% intersects an area at medium risk of flooding from surface water (1 in 100) and/or intersects an area in with a more than 50% but less than 75% susceptibility to Groundwater Flooding.
	5	The site is defined as Flood Zone 1 and over 10% intersects an area at low risk of flooding from surface water (1 in 1000) and/or intersects an area with more than 25% but less than 50% susceptibility to Groundwater Flooding.
Low	6	The site is defined as Flood Zone 1 and is at risk of reservoir flooding in the event of a failure or a breach on a wet or dry day and/or intersects an area with less than 25% susceptibility to groundwater flooding.
	7	The site is defined as Flood Zone 1, is not shown to be susceptible to surface water and intersects with an area with less than 25% susceptibility to groundwater flooding.

4.7. The above table summarises how the risk of flooding has been assessed, based on the location or features of the site in question using data sourced from the SFRA. This considers the following:

- The proportion of the site which sits within either Flood Zone 1, 2 or 3,
- The proportion of the site which is at risk of 1000 year, 100 year and 30 year risk of flooding from surface water,
- The proportion of the site at risk of groundwater flooding
- The proportion of the site at risk of flooding due to reservoir failure.

5. Findings and conclusions

5.1. The Sequential Test has been applied to the 35 proposed site allocations within the Regulation 19 Epsom and Ewell Local Plan based on the methodology set out in Table 1. The findings are set out in Appendix A and B and the conclusions summarised below:

- 31 sites are wholly located in medium flood risk areas throughout the lifetime of the development and are therefore deemed suitable for development including residential use.
- 4 sites are wholly located in low-risk areas for the lifetime of development and are therefore deemed suitable for development including residential use.

- No sites qualify for an exception test as they are all located within Flood Zone 1 for fluvial flooding (see para 3.2).
- 5.2. Appendix A of this paper sets out the findings in relation to the sequential preferability of the Proposed Submission Local Plan allocations in relation to flood risk from all sources.
- 5.3. Appendix A concludes that:
- all sites allocated in the plan have found to be either medium or low risk, when assessed against the flood risk criteria detailed in Table 1 and are therefore the most sequentially preferable; and
 - the Exception Test does not apply to any of the allocation sites as they are all located within Flood Zone 1 for fluvial flooding.
- 5.4. Where sites do have some risk of flooding, it will be a requirement for the site to be developed in a manner which accords with national policy requirements, proposed policies in the Local Plan and recommendations in the Level 2 Flood Risk Assessment, where applicable.
- 5.5. The Proposed Submission Local Plan has been informed by a land availability assessment, site assessment methodology and Sustainability Appraisal. Through the sustainability appraisal, flood risk has been considered and balanced against other planning (sustainable development) objectives, to select an appropriate strategy for the Local Plan. The sustainability objectives considered through the sustainability appraisal include the following:
- Accessibility
 - Air Quality
 - Biodiversity
 - Climate Change Adaptation (including flood risk)
 - Community impact
 - Economy and Employment
 - Historic Environment
 - Housing
 - Land and Soils
 - Landscape
 - Transport
 - Water quality

Appendix A: Assessment of Flood Risk

Site ref.	Site name	Proposed development	Vulnerability	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding	Flood Risk Score	Sequential Test Passed?	Exception Test Passed?
SA1	Southern Gas Network Site	Residential and educational	More vulnerable	1	High risk (1 in 30 Year Extent) – 6.58% Medium risk (1 in 100 Year Extent) – 16.73% Low risk (1 in 1000 Year Extent) – 30.47%	99.4% of site >= 25% <50% 0.6% of site >= 50% <75%	Sewer flooding – 20 incidents within the predominant postcode Reservoir – No risk	4 (intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA2	Hook Road Car Park	Residential	More vulnerable	1	High risk (1 in 30 Year Extent) – 9.75% Medium risk (1 in 100 Year Extent) – 14.85% Low risk (1 in 1000 Year Extent) – 28.37%	45.1% of site >= 25% <50% 54.9% of site >= 50% <75%	Sewer flooding - 6 incidents within the predominant postcode Reservoir – No risk	4 (intersects w 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA3	Solis House, 20 Hook Road	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 6.64% Medium (1 in 100 Year Extent) – 20.46% Low risk (1 in 1000 Year Extent) – 100%	All of site >= 50% <75%	Sewer flooding - 6 incidents within the predominant postcode Reservoir – No risk	4 (intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA4	Bunzl, Hook Road	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 35.42% Medium (1 in 100 Year Extent) – 46.73% Low (1 in 1000 Year Extent) – 100%	1.9% of site >= 25% <50% 98.1% of site >= 50% <75%	Sewer flooding - 6 incidents within the predominant postcode Reservoir – No risk	3 (more than 10% in area of “High” surface water flooding extent)	Yes (see Appendix B)	Not Required (See Appendix B)
SA5	Epsom Town Hall	Residential	More vulnerable	1	High (1 in 30 Year Extent) - 19.16% Medium (1 in 100 Year Extent) – 37.02% Low (1 in 1000 Year Extent) – 53.8%	10.45% of site >= 25% <50% 89.55% of site >= 50% <75%	Sewer flooding – 1 incident within the predominant postcode Reservoir – No risk	3 (more than 10% of site in area of “High” surface water flooding extent)	Yes (see Appendix B)	Not Required (See Appendix B)
SA6	Hope Lodge Car Park	Residential	More vulnerable	1	Low (1 in 1000 Year Extent) – 2.35%	All of site >= 25% <50%	Sewer flooding - 6 incidents within the predominant	5 (intersects w.	Yes (see Appendix B)	Not Required (See Appendix B)

Site ref.	Site name	Proposed development	Vulnerability	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding	Flood Risk Score	Sequential Test Passed?	Exception Test Passed?
							postcode Reservoir – No risk	25-50% of area subject to GWF)		
SA7	Former Police and Ambulance Station Sites	Residential (Specialist)	More vulnerable	1	Medium (1 in 100 Year Extent) 15.25% Low (1 in 1000 Year Extent) – 33.9%	All of site >= 25% <50%	Sewer flooding – 6 incidents within the predominant postcode Reservoir – No risk	4 (more than 10% of site in area of “Medium” surface water flooding extent)	Yes (see Appendix B)	Not Required (See Appendix B)
SA8	Epsom Clinic	Residential	More vulnerable	1	Medium (1 in 100 Year Extent) – 6.15% Low risk (1 in 1000 Year Extent) – 38.74%	All of site >= 25% <50%	Sewer flooding - 6 incidents within the predominant postcode Reservoir – No risk	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA9	Depot Road and Upper High Street Car Park	Residential and new multi-storey car park.	More vulnerable	1	Medium (1 in 100 Year Extent) - 0.06% of site Low (1 in 1000 Year Extent) – 15.38% of site	All of site >= 25% <50%	Sewer flooding – 6 incidents within the predominant postcode Reservoir – No risk	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA10	79-85 East Street	Residential	More vulnerable	1	Low (1 in 1000 Year Extent) – 7.77%	All of site >= 25% <50%	Sewer flooding - 20 incidents within the predominant postcode Reservoir – No Risk	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA11	Finachem House, 2 – 4 Ashley Road	Residential	More vulnerable	1	Medium (1 in 100 Year Extent)– 11.96% Low (1 in 1000 Year Extent) – 15.66%	All of site >= 50% <75%	Sewer flooding – 1 incident within the predominant postcode Reservoir – No risk	4 (intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA12	Global House	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 4.00% Medium (1 in 100 Year	All of site >= 50% <75%	Sewer flooding – 1 incident within the predominant	4 (intersects w.	Yes (see Appendix B)	Not Required (See Appendix B)

Site ref.	Site name	Proposed development	Vulnerability	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding	Flood Risk Score	Sequential Test Passed?	Exception Test Passed?
					Extent) – 7.15% Low (1 in 1000 Year Extent) – 11.95%		postcode Reservoir – No risk	50-75% of area subject to GWF)		
SA13	Swail House	Residential	More vulnerable	1	High – (1 in 30 Year Extent) 7.69% Medium (1 in 100 Year Extent) – 16.49% Low (1 in 1000 Year Extent) – 53.78%	All of site >= 50% <75%	Sewer flooding- 1 incident within the predominant postcode. Reservoir – No risk	4 (intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA14	60 East Street	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 10.24% Medium (1 in 100 Year Extent) – 37.68% Low (1 in 1000 Year Extent) – 62.33%	All of site >= 25% <50%	Sewer flooding - 20 incidents within the predominant postcode. Reservoir – No risk	3 (more than 10% of site in area of “High” surface water flooding extent).	Yes (see Appendix B)	Not Required (See Appendix B)
SA15	Corner of Kiln Lane and East Street (101b East Street)	Residential	More vulnerable	1	None	All of site >= 25% <50%	Sewer flooding - 20 incidents within the predominant postcode. Reservoir – No risk	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA16	Land at Kiln Lane	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 0.03% Medium (1 in 100 Year Extent) – 6.26% Low (1 in 1000 Year Extent) – 31.4% of site	All of site >= 25% <50%	Sewer flooding – 20 incidents within the predominant Reservoir – No risk	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA17	Hatch Furlong Nursery	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 8.25% Medium (1 in 100 Year Extent) – 12.18% Low (1 in 1000 Year Extent) – 33.95%	All of site >= 25% <50%	Sewer flooding – 20 incidents within the predominant Reservoir – No risk	4 (more than 10% of site in area of “Medium” surface water flooding extent)	Yes (see Appendix B)	Not Required (See Appendix B)
SA18	Land to the Rear of Rowe Hall	Residential (Specialist)	More vulnerable	1	Medium (1 in 100 Year Extent) – 1.21% Low 1 in 1000 Year Extent) – 3.52%	All of site <= 25%	Sewer flooding – zero incidents within the predominant postcode.	7 (intersects w. less than 25% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)

Site ref.	Site name	Proposed development	Vulnerability	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding	Flood Risk Score	Sequential Test Passed?	Exception Test Passed?
							Reservoir – No risk			
SA19	7 Station Approach	Residential	More vulnerable	1	None	All of site <= 25%	Sewer flooding - 12 incidents within the predominant postcode. Reservoir – No risk	7 (intersects less than 25% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA20	Esso Express, 26 Reigate Road	Residential	More vulnerable	1	Medium (1 in 100 Year Extent) - 9.62% Low (1 in 1000 Year Extent)– 23.81%	All of site >= 25% <50%	Sewer flooding – 20 incidents within the predominant Reservoir – No risk	5 (More than 10% of site in area of “low” surface water flooding extent and intersects w. 25-50% of area subject to GWF).	Yes (see Appendix B)	Not Required (See Appendix B)
SA21	Richards Field Car Park	Residential (Specialist)	More vulnerable	1	Medium (1 in 100 Year Extent) – 15.21% Low (1 in 1000 Year Extent) – 26.51%	All of site >= 75%	Sewer flooding - 14 incidents within the predominant Reservoir – No risk	3 (intersects w. 75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA22	Etwelle House, Station Road	Residential	More vulnerable	1	None	All of site >= 25% <50%	Sewer flooding - 20 incidents within the predominant Reservoir – No risk	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA23	140-142 Ruxley Lane	Residential	More vulnerable	1	Low – (1 in 1000 Year Extent) 6.43%	All of site <= 25%	Sewer flooding – 14 incidents within the predominant Reservoir – No risk	6 (intersects w. less than 25% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA24	Garages at Somerset Close & Westmorland Close	Residential	More vulnerable	1	High (1 in 30 Year Extent)– 8.19% Medium (1 in 100 Year Extent)-10.65% Low (1 in 1000 Year	67.7% of site >= 25% <50% 32.3% of site >= 75%	Sewer flooding – 14 incidents within the predominant postcode	3 (intersects w. 75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)

Site ref.	Site name	Proposed development	Vulnerability	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding	Flood Risk Score	Sequential Test Passed?	Exception Test Passed?
					Extent)– 15.41%		Reservoir – No risk			
SA25	64 South Street Epsom	Residential	More vulnerable	1	High (1 in 30 Year Extent) - 0.07% Medium (1 in 100 Year Extent) – 10.01% Low (1 in 1000 Year Extent) – 34.42%	All of site >= 50% <75%	Sewer flooding – 16 incidents within the predominant postcode Reservoir – No risk.	4 (more than 10% of site in area of “Medium” surface water flooding extent intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA26	35 Alexandra Road	Residential	More vulnerable	1	None	All of site >= 25% <50%	Sewer flooding – 6 incidents within the predominant Reservoir – No risk.	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA27	22-24 Dorking Road	Residential	More vulnerable	1	None	47.7% of site >= 25% <50% 52.3% of site >= 50% <75%	Sewer flooding – 16 incidents within the predominant Reservoir – No risk.	4 (intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA28	63 Dorking Road	Residential	More vulnerable	1	Low – (1 in 1000 Year Extent) 16.97%	All of site >= 25% <50%	Sewer flooding – 16 incidents within the predominant Reservoir – No risk.	5 (intersects w. 25-50% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA29	65 London Road	Residential(Specialist)	More vulnerable	1	None	All of site <= 25%	Sewer flooding - 9 incidents within the predominant postcode Reservoir – No risk.	7 (intersects w. less than 25% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA30	Epsom General Hospital	Residential(Specialist)	More vulnerable	1	High (1 in 30 Year Extent) – 4.247% Medium (1 in 100 Year Extent) – 16.73% Low (1 in 1000 Year Extent) – 52.81%	All of site >= 25% <50%	Sewer flooding – 16 incidents within the predominant postcode Reservoir – No	4 (more than 10% of site in area of “Medium” surface water	Yes (see Appendix B)	Not Required (See Appendix B)

Site ref.	Site name	Proposed development	Vulnerability	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding	Flood Risk Score	Sequential Test Passed?	Exception Test Passed?
							risk.	flooded extent)		
SA31	Land at West Park Hospital (South)	Residential	More vulnerable	1	High (1 in 30 Year Extent) -3.65% Medium (1 in 100 Year Extent) - 5.2% Low (1 in 1000 Year Extent) - 11.2%	All of site <= 25%	Sewer flooding – 6 incidents within the predominant postcode Reservoir – No Risk	5 (more than 10% of site in area of “low” surface water flooding extent)	Yes (see Appendix B)	Not Required (See Appendix B)
SA32	Land at West Park Hospital (North)	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 1.31% Medium (1 in 100 Year Extent) – 8.4% Low (1 in 1000 Year Extent) – 25.71%	All of site <= 25%	Sewer flooding – 6 incidents within the predominant postcode Reservoir – No Risk	5 (more than 10% of site in area of “low” surface water flooding extent)	Yes (see Appendix B)	Not Required (See Appendix B)
SA33	Land at Chantilly Way	Residential	More vulnerable	1	High (1 in 30 Year Extent) – 1.49% Medium (1 in 100 Year Extent) - 3.96% Low (1 in 1000 Year Extent) – 10.51%	All of site >= 75%	Sewer flooding – 6 incidents within predominant postcode Reservoir – No Risk.	3 (intersects w. more than 75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA34	Hook Road Arena	Residential and sports hub	More vulnerable	1	High – (1 in 30 Year Extent) 0.14% Medium (1 in 100 Year Extent) – 1.64% Low (1 in 1000 Year Extent) – 10.2%	46% of site >= 50% <75% 54% of site >= 75%	Sewer flooding – 6 incidents within predominant postcode Reservoir – No Risk.	4 (intersects w. 50-75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)
SA35	Land at Horton Farm	Gypsy and Traveller Accommodation Residential	Highly Vulnerable More vulnerable	1	High (1 in 30 Year Extent) – 0.79% Medium (1 in 100 Year Extent) – 2.56% Low (1 in 1000 Year Extent) – 13.03%	54.91% of site <= 25% 45.09% of site >= 75%	Sewer flooding – 6 incidents within predominant postcode Reservoir – No Risk.	3 (intersects w. 75% of area subject to GWF)	Yes (see Appendix B)	Not Required (See Appendix B)

Appendix B: Sequential Test and Exception Test Questions

Sites of Low Risk – Sequential Assessment			
SA18 – Land to the Rear of Rowe Hall SA29 – 65 London Road		SA19 – 7 Station Approach	SA23 – 140-142 Ruxley Lane
Q	Can the development be allocated in areas of low flood risk both now and in the Future?		
A	Yes		
	SEQUENTIAL TEST PASSED		

Sites of Medium Risk – Sequential Assessment		
SA1 – Southern Gas Network SA4 – Bunzl, Hook Road SA7 – Former Police and Ambulance Station SA10 – 79-85 East Street SA13 – Swail House SA16 – Land at Kiln Lane SA21 – Richards Field Car Park SA25 – 64 South Street SA28 – 63 Dorking Road SA32 – Land at West Park Hospital SA35 – Land at Horton Farm	SA2 – Hook Road Arena SA5 – Epsom Town Hall SA8 – Epsom Clinic SA11 – Finachem house SA14 – 60 East Street SA17 – Hatch Furlong Nursery SA22 – Etwelle House, Station Road SA26 – 35 Alexandria Road SA30 – Epsom General Hospital SA33 – Land at Chantilly Way	SA3 – Solis House, 20 Hook Road SA6 – Hope Lodge Car Park SA9 – Depot Road and Upper high Street Car Park SA12 – Global House SA15 – Corner of Kiln Lane and East Street SA20 – Esso Express, 26 Reigate Road SA24 – Garages at Somerset Close and Westmorland Cloise SA27 – 22-24 Dorking Road SA31 – Land at West Park Hospital SA34 – Hook Road Arena
	Sequential Questions from Diagram 2	
Q	Can the Development be allocated in areas of low flood risk both now and in the future?	
A	No (Scores 4 on risk scale and therefore “Medium Risk”)	
Q	Can development be allocated in areas of medium flood risk in the future?	
A	Yes (Scores 4 on risk scale and therefore “Medium Risk”)	
	Sequential Questions from Diagram 3	
Q	Has the sequential test been applied and shown that there are no reasonably available, lower risk sites, suitable for the proposed development, to which the development could be steered?	
A	Yes (Site assessment methodology and Sustainability Appraisal shows that no other sites are available, suitable or achievable that are in as sustainable a location, to meet the level and type of development required on this site)	
Q	Is the exception test required?	
A	No – The site is classified as “More vulnerable” or “Highly Vulnerable” development in Flood Zone 1 as defined by Annexe 3 of the NPPF, therefore the Exception Test is not required, as determined by Table 2: Flood Risk vulnerability and flood zone “incompatibility” in Planning Practice Guidance.	
Q	Can the development be made safe throughout its lifetime without increasing flood risk elsewhere?	
A	Yes – mitigation measures to be determined on application	
	DEVELOPMENT CAN BE CONSIDERED FOR ALLOCATION OR PERMISSION	