

# Local Plan Sequential Test

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## 1. Introduction

Much of the Broads is affected by flood risk. The Local Plan for the Broads allocates sites for certain development as well as includes policies that guide how a site can develop and change. The NPPF (para 167) says that when preparing a Local Plan, a Sequential Test needs to be produced where flood risk is a consideration.

This Sequential Test has been produced to address the requirements of the NPPG: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/flood_risk_and_coastal_change_-_gov.uk.pdf). The Sequential Test is also a planning policy requirement of the National Planning Policy Framework (NPPF) as set out in paragraphs 167 and 168. The Environment Agency and Norfolk and Suffolk Lead Local Flood Risk Authorities were consulted, and their comments are included at [Appendix 1](#).

## 2. What is the ‘Sequential Approach’?

The NPPF says:

167. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and

d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations

The NPPG says (para 023):

The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test. Other forms of flooding need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so that the sequential approach can be applied across all areas of flood risk.

### 3. What is the 'Exception Test'

The NPPG says (para 031):

The Exception Test requires two additional elements to be satisfied (as set out in paragraph 164 of the National Planning Policy Framework) before allowing development to be allocated or permitted in situations where suitable sites at lower risk of flooding are not available following application of the sequential test.

It should be demonstrated that:

- development that has to be in a flood risk area will provide wider [sustainability benefits to the community that outweigh flood risk](#); and
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The Exception Test is not a tool to justify development in flood risk areas when the Sequential Test has already shown that there are reasonably available, lower risk sites, appropriate for the proposed development. It would only be appropriate to move onto the Exception Test in these cases where, accounting for wider sustainable development

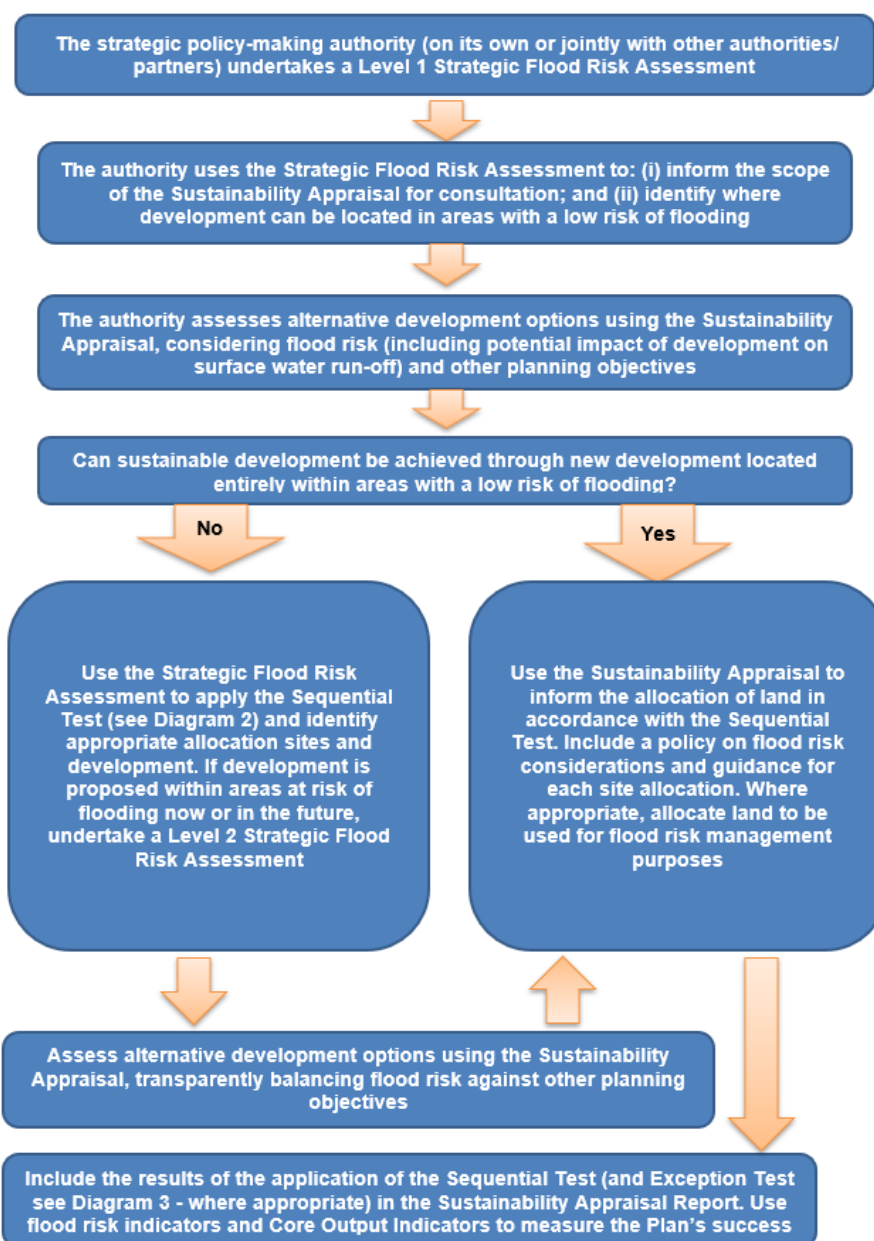
objectives, application of relevant local and national policies would provide a clear reason for refusing development in any alternative locations identified. Table 2 sets out the circumstances when the Exception Test will be required.

## 4. What the NPPG says

The NPPG says the following:

### What process is used in plan or decision-making where flood risk is a consideration?

Where an assessment shows that flood risk is a consideration for a plan or development proposal, the process is set out below (Diagram 1):



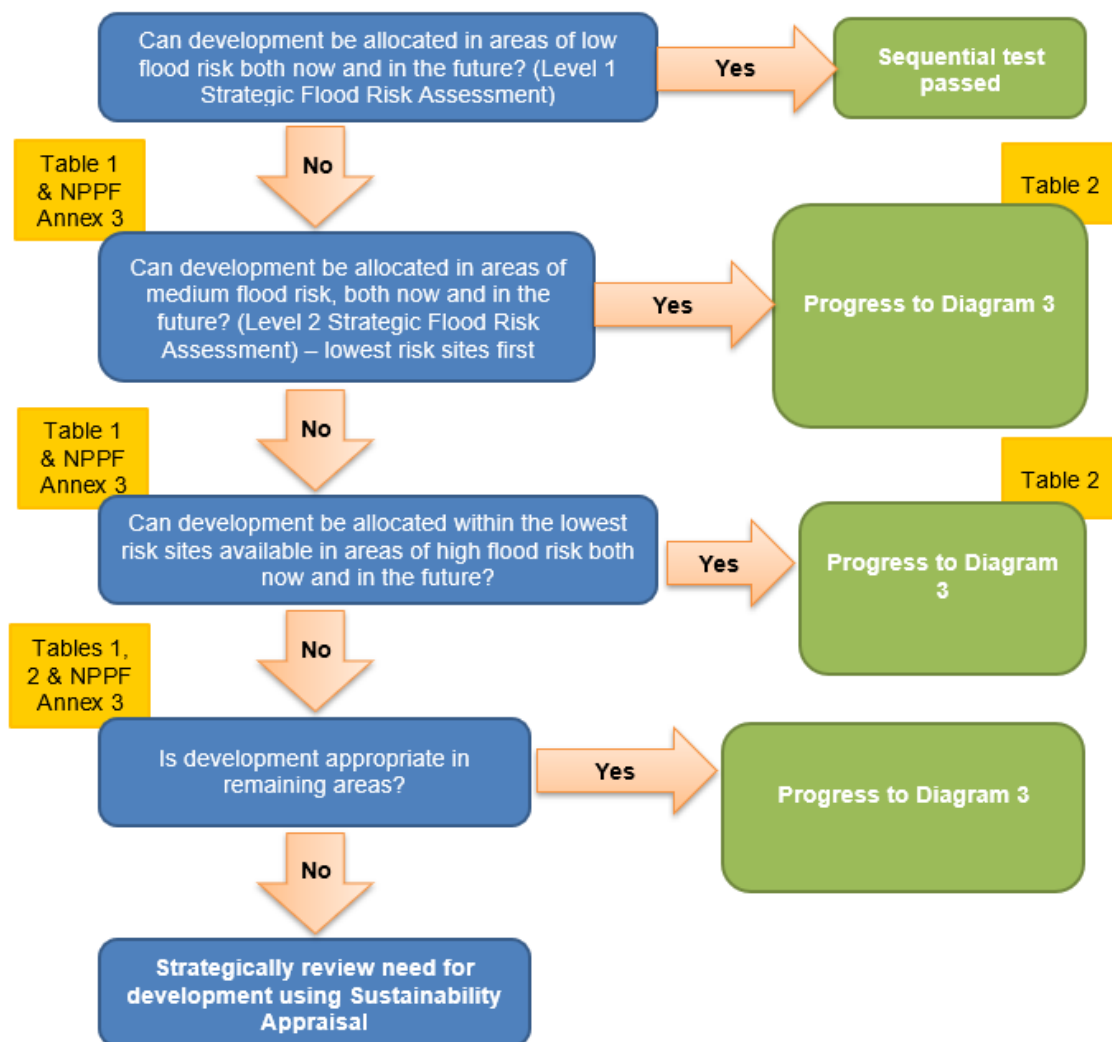
**Para 025: How can the Sequential Test be applied in the preparation of strategic policies?**

This is illustrated in diagram 2. The Sequential Test needs to be applied to the whole local planning authority area to increase the possibilities of accommodating development, which is not exposed to flood risk, both now and in the future.

Where possible, local planning authorities can jointly review development options over a wider area (e.g. a river catchment) where this could potentially broaden the scope for opportunities to reduce flood risk and put the most vulnerable development in lower risk areas, considering flood risk both now and in the future.

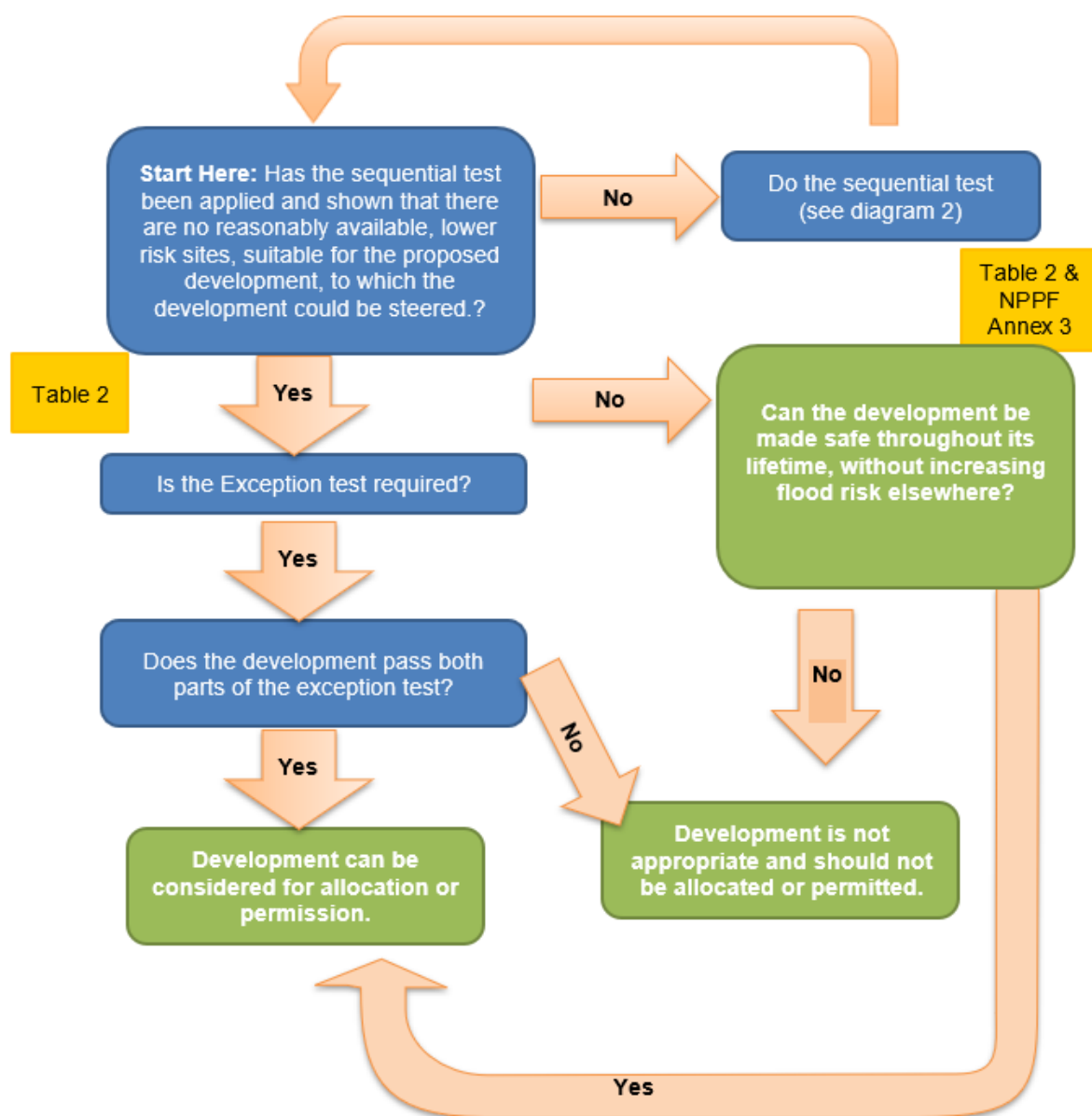
Plan policies designed to exempt specific types of planning applications, such as windfall sites, from the sequential test may be considered, where such policies can restrict the exemption to specific sites that have been subject to, and satisfy, the sequential test at the plan-making stage.

**Diagram 2: Application of the Sequential Test for plan preparation**



And in terms of the Exception Test, the NPPF says:

**Diagram 3: Application of the Exception Test to plan preparation**



## 5. Residential Moorings

The aim of the sequential approach/test is set out in the NPPG which says: ‘The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding’. Residential moorings and the boat that will subsequently be lived on are in flood zone 3b by their very nature. The [Housing and Planning Act 2016](#) at Section 124 requires Local Planning Authorities to identify and meet the need of those who live on a boat. So, we are required by law to meet the need of those living on boats on inland waterways. It is therefore not clear how the allocation of

residential moorings, whereby the boat to be lived on and the mooring itself are in 3b, can have the sequential test applied as if you are living on a boat that is on water then you can't be located in areas of lower risk of flooding. This is why we have flood risk related text in the supporting text of the detailed residential moorings policy.

The NPPG says at paragraph 31: *The Exception Test requires two additional elements to be satisfied (as set out in paragraph 164 of the National Planning Policy Framework) before allowing development to be allocated or permitted in situations where suitable sites at lower risk of flooding are not available following application of the sequential test.*

The two tests of the Exception Test are:

(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall

In terms of (a): The [Housing and Planning Act 2016](#) at Section 124 requires Local Planning Authorities to identify and meet the need of those who live on a boat. Living on a boat provides a form of housing, benefitting the community in terms of contributing to meeting housing need.

In terms of (b): We have numerous allocations for residential moorings, and these also need to address the generic residential moorings policy requirements. By the very nature of living on a boat, one is within the body of water which is flood zone 3b. Therefore, this is residential use within flood zone 3b. As such, we say in supporting text to the generic residential moorings policy that a site-specific flood risk assessment and flood response plan is required as well as monitoring of how the boat is moored and tethered to the bank. We also say that schemes will need to pass the Exception Test.

## 6. Water Compatible Uses

Although the Exception Test is not required for water-compatible uses, it is worth highlighting that these should still be designed and constructed to:

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

This is set out in paragraph 079 of the NPPG.

This applies to relevant uses, classed as water compatible, at these sites: BRU1, BRU2, BRU3, BRU4, BRU5, POBRU6, CHE1, DIL 1, DIT1, DIT2, GIL1, HOR3, HOR4, HOR5, HOR6, HOR7, HOV1, LOD1, NOR2, ORM1 ("depending on precise operation"), OUL1, PHRB3, SOL1, SOM1, STA1, TSA1, TSA2 (unless more vulnerable development is proposed), TSA3, TSA4, TSA5, WHI1 (aside for café and car park), SSTRI, SSUT, SSTRACKS, SSSTAITHES, SSCOAST,

SSLGS, DM9. It should be noted that some uses of these areas may have different vulnerability classes.

## 7. All sources of flooding

The Sequential Test looks at:

- Fluvial and Tidal – using the 2017 SFRA flood risk zones.
- Considers climate change - using the 2017 SFRA flood risk zones. The SFRA may not show flood risk climate change allowances in some areas, but the NPPF and NPPG requirements will need to be followed in terms of climate change allowances: [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/flood-risk-assessments-climate-change-allowances-2019.pdf)
- Reservoir flooding – using Reservoir Flooding layer on GIS. Note that the EA have said that it would be sensible to add it as a constraint in the Local Plan and to mention this in the Sequential Test and that the reservoir flood extents seem to all be encompassed by the fluvial/tidal flood zones (FZ2/3) so adding reservoir flooding as a constraint is unlikely to have any significant impact on the assessment of the sequential test but it should be stated that it has been considered (as have all forms of flooding).
- Surface water flooding - using the 2017 SFRA flood risk zones.
- Groundwater flooding - using the 2017 SFRA flood risk zones.

Please note that the constraints and features section of each relevant policy in the Local Plan reflects the flood risk experienced at the sites as per the following table.

## 8. Policies in the Local Plan for the Broads

It is important to note that not all the site-specific policies allocate an area of land for certain uses. Most policies set criteria to guide what could happen in areas – so not all policies are allocation policies. Those that are allocation policies have the policy title cell coloured blue.

It should be noted that this Sequential Test assess the policies of the Local Plan. This Sequential Test does not assess particular schemes that an applicant puts forward. As such, a Sequential Test of proposals may be required and so too may an Exception Test depending on the scheme proposal that an applicant puts forward.



## 9. Sequential Test of all Site-Specific Policies.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBACL1: Acle Cemetery extension	Cemetery extension	1	SFRA does not show climate change allowance in this area.	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Not specifically covered. EA suggest these should be considered more vulnerable due to the water pollution risk.	Exception Test not required.	N/A	Passes sequential test. It is important to note that all proposals for burial grounds need to address Environment Agency requirements relating to groundwater and water pollution risk.
PUBACL2: Acle Playing Field extension.	Playing field extension.	1	SFRA does not show climate change allowance in this area.	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Water-Compatible Development	Exception Test not required.	N/A	Passes sequential test
PUBBRU1: Riverside chalets and mooring plots	Riverside chalets and moorings plots	EA flood zone 3. SFRA indicative flood zone 3b.	SFRA does not show climate change allowance in this area.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Chalets - More vulnerable Mooring plots - presume similar to amenity open space so water compatible development	Chalets – policy only allows extensions and replacements, not new. Exception Test not required subject to details of any application. Mooring plots - Exception Test not required.	On a site, there may be areas that have lower probability of flooding, so potentially, yes.	Chalets - policy states that additional more vulnerable uses will not be permitted. Relates to changes to the existing land use such as replacement or extensions and policy refers to area being constrained due to flooding. Design response to flooding is a specific issue to be dealt

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
										<p>with through planning application process.</p> <p>Mooring plots – passes the sequential test. These should still be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul>
PUBBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	Riverside estate boatyards etc	EA flood zone 3. SFRA indicative flood zone 3b.	SFRA does not show climate change allowance in this area.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Parts of site are affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Presume same as marina/ship building so water compatible development	Exception Test not required.	N/A	Passes sequential test
PUBBRU3: Brundall Mooring Plots	Brundall mooring plots	EA flood zone 3. SFRA indicative flood zone 3b.	SFRA does not show climate change allowance in this area.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Presume similar to amenity open space so water compatible development.	Exception Test not required.	N/A	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBBRU4: Brundall Marina	Brundall Marina	EA flood zone 3. SFRA indicative flood zone 3b.	SFRA does not show climate change allowance in this area.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Water-Compatible Development	Exception Test not required.	N/A	Passes sequential test
PUBBRU5: Land east of the Yare Public House	Land east of White Heron Public House – amenity open space with a small car park.	2 (part of)	SFRA does not show climate change allowance in this area.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Parts of site are affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Water-Compatible Development. Car parks is less vulnerable.	Exception Test not required.	N/A	Passes sequential test
PUBBRU6: Brundall Gardens	Residential moorings.	3b	SFRA does not show climate change allowance in this area.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	These are considered as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable.	The marina assessment indicates that Exception Test not required, and the residential element indicates that Exception Test required.	No as it is people living on boats which then are on water.	The EA's interpretation passes the sequential test. Looking at the residential element in isolation, it does not.  To reflect that this policy relates to people living on boats on water, the supporting text of the generic residential moorings policy emphasises the issue of mooring technique and also the need for Flood Response Plans.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBCAN1: Cantley Sugar Factory	Sugar beet works.	Some 1, 2, EA3 and Indicative 3b.	SFRA does not show climate change allowance in this area.	Mapping shows a very small part could be affected on a dry day if North Lake Cantley floods.	Parts of site are affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Less vulnerable	Exception Test not required. Development should not be permitted if within FZ3b, as set out in Table 2, paragraph 079 of the NPPG.	N/A	Passes sequential test. Development should be sequentially located within the site, based on the site-specific flood risk assessment.
PUBCHE1: Greenway Marine residential moorings	Residential moorings.	3b	SFRA does not show climate change allowance in this area.	Affected on a wet day if Reeder's Reservoir floods according to mapping.	Parts of site are affected by surface water.	Area susceptible to groundwater flooding – less than 25%	These are considered as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable.	The marina assessment indicates that Exception Test not required, and the residential element indicates that Exception Test required.	No as it is people living on boats which then are on water.	The EA's interpretation passes the sequential test. Looking at the residential element in isolation, it does not.  To reflect that this policy relates to people living on boats on water, the supporting text of the generic residential moorings policy emphasises the issue of mooring technique and also the need for Flood Response Plans.
PUBDIL 1: Dilham Marina (Tyler's Cut Moorings)	Tyler's Cut Moorings.	Mostly 1, part in 2 and part in indicative 3b	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Parts of site are affected by surface water.	Area susceptible to groundwater flooding – 50% - 75%	Presume similar to amenity open space so water compatible development.	Exception Test not required.	N/A	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBDIT1: Maltings Meadow Sports Ground, Ditchingham	Sport and recreation. Main building (including a drinking establishment).	Main building and approximately half the area in flood zone 1. Most of area in flood zone 2. Part in indicative 3b.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – more than 25% and more than 75%	Drinking establishment is more vulnerable. Car parks is less vulnerable. Outdoor sport and recreation and essential facilities is water compatible.	Drinking establishment – Exception Test required. Car park Exception Test not required. Outdoor sport Exception Test not required.	On site, yes if needed. All built development would be outside the flood zones – adopting a sequential approach to development on site. More vulnerable uses not appropriate in 3b for example.	Passes sequential test generally. Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.  If the site were to be redeveloped in its entirety, the whole site would need to be considered as the most vulnerable use of all the component parts (more vulnerable), as set out in paragraph 079 of the NPPG). Individual elements brought forward separately can be classified under the most relevant vulnerability.
PUBDIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck	Open space, Beck and habitat area	2, 3a and 3b	SFRA does not show climate change allowance in this area	Mapping shows eastern extent of the open space affected if Ditchingham Lake floods on a wet day.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – more than 25% and more than 75%	Amenity open space.	Exception Test not required.	N/A	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBFLE1: Broadland Sports Club	Sport and recreation. Main building (including a drinking establishment).	Part 1, 2 and indicative 3b	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Mapping does not show area susceptible to groundwater flooding.	Drinking establishment is more vulnerable. Car parks is less vulnerable. Outdoor sport and recreation and essential facilities is water compatible. Indoor sport is less vulnerable.	Drinking establishment – Exception Test required if in 3a. Car park Exception Test not required if in 1, 2, 3a. Outdoor sport Exception Test not required. Indoor sport Exception Test not required if in 1, 2, 3a.	On site, yes if needed. All built development would adopt a sequential approach to development on site. More vulnerable uses not appropriate in 3b for example. all built development will be located in Flood Zone 1, adopting a sequential approach to development on site	Passes sequential test generally. Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.  If the site were to be redeveloped in its entirety, the whole site would need to be considered as the most vulnerable use of all the component parts (more vulnerable), as set out in paragraph 079 of the NPPG). Individual elements brought forward separately can be classified under the most relevant vulnerability.
PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)	Residential moorings.	3b	SFRA does not show climate change allowance in this area	Mapping shows site affected if Ditchingham Lake floods on a wet day.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	These are considered as effectively marinas so water compatible. But also aware that people will live on these boats	The marina assessment indicates that Exception Test not required, and the residential element indicates	No as it is people living on boats which then are on water.	The EA's interpretation passes the sequential test. Looking at the residential element in isolation, it does not.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
							so there is a residential element of it which is more vulnerable.	that Exception Test required.		To reflect that this policy relates to people living on boats on water, the supporting text of the generic residential moorings policy emphasises the issue of mooring technique and also the need for Flood Response Plans.
PUBGTY1: Marina Quays (Port of Yarmouth Marina)	Regeneration of brownfield site which is compatible with flood risk.	The Flood Map for Planning and the 2017 SFRA show this site to be FZ3, with the SFRA also showing an area of partial indicative FZ3b.	Site affected by Tidal climate change: 0.5% APE and 0.1% AEP.	Mapping does not show the site is affected by reservoir flooding.	Very small area of the southern part of the site affected by surface water.	Mapping does not show area susceptible to groundwater flooding.	No specific land use is prescribed – policy says proposals need to be compatible with flood risk to the site.	Exception Test may be required or may not be required, depending on the proposal and where it is located.	On site, potentially, yes, depending on site specific flood risk assessment findings.	It is difficult to apply the Sequential Test at this stage if the end use is not known and the nature of the risk affecting the site is unclear. A site-specific flood risk assessment likely required to ascertain flood risk on site. This site has been identified for development as it was an area that was run down on the urban/rural fringe on the way into Great Yarmouth. A sequential test will need to be applied at the application stage as the final

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
										land use is not specified in the policy.
PUBHOR1: Horning Car Parking	Car parking	1	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Less vulnerable.	Exception Test not required.	N/A.	Passes sequential test
PUBHOR2: Horning Open Space (public and private)	Open space	1, 2 and part modelled 3b. EA3 on some.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Water compatible.	Development is appropriate	N/A.	Passes sequential test
PUBHOR3: Waterside plots	Waterside plots including some buildings. General upkeep.	Mostly modelled 3b, some 2.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Very small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Chalets (including gardens <sup>1</sup> ) - More vulnerable Mooring plots and gardens - presume similar to amenity open space so water compatible development	Chalets – policy only allows extensions and replacements, not new. Exception Test not required subject to details of any application. Mooring plots - Exception Test not required.	On a site, there may be areas that have lower probability of flooding, so potentially, yes.	Passes sequential test. Policy includes dwellings, but only relates to upkeep rather than new. Indeed, due to Water Recycling Centre Constraints, net new dwellings not able to come forward in Horning. Also, the policy itself states the requirement for consistency with policies on flood risk.

<sup>1</sup> Note that the EA usually consider residential gardens to also be ‘more vulnerable’ due to permitted development rights.



Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBHOR4: Horning Sailing Club	Sailing club buildings.	SFRA – part 2, mostly modelled 3b. EA, all 3.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Water compatible.	Exception Test not required.	On a site, there may be areas that have lower probability of flooding, so potentially, yes.	Passes sequential test.  Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.
PUBHOR5: Crabbett's Marsh	Nature conservation.	SFRA – part 2, mostly modelled 3b. EA, all 3.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Water compatible.	Exception Test not required.	N/A.	Passes sequential test
PUBHOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road	Employment, boatyards.	SFRA and EA – part 2, mostly modelled 3b.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Employment – less vulnerable.  Boatyards – water compatible.	Employment: Exception Test not required if in 1, 2, 3a.  Boatyards: Exception Test not required.	Within the area allocated, yes. Less vulnerable (employment) uses will not be located in an area deemed to be FZ3b.	Passes sequential test
PUBHOR7: Woodbastwick Fen moorings	Seeks minimal development.	SFRA – part 2, mostly modelled 3b. EA, all 3.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Water compatible.	Exception Test not required.	N/A.	Passes sequential test
PUBHOR8: Land on the Corner of Ferry Road, Horning	Live work units.	Very small part in EA3, SFRA 2 and modelled 3b.	SFRA does not show climate change	Mapping does not show the site is affected by reservoir flooding.	Some of site affected by surface water flooding.	Mapping does not show area susceptible to groundwater flooding.	Less vulnerable on lower floor. More vulnerable on upper floor.	Exception Test not required/does not apply as the policy is for the retention of existing uses.	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			allowance in this area							
PUBHOV1: Green infrastructure	Green Infrastructure.	Part in modelled 3b.	SFRA does not show climate change allowance in this area	Mapping shows site affected if Beeston Hall reservoir floods on a wet day.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Water compatible.	Exception Test not required.	N/A.	Passes sequential test
PUBHOV2: Station Road car park	Car parking	Most in flood zone 1, small part flood zone 2.	SFRA does not show climate change allowance in this area	Mapping shows site affected if Beeston Hall reservoir floods on a wet day.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Less vulnerable.	Exception Test not required.	N/A.	Passes sequential test
PUBHOV3: Brownfield land off Station Road, Hoveton	Land on Station Road. Potential uses could include holiday accommodation, retail, food and drink.	Mostly 2, very small part modelled 3b.	SFRA does not show climate change allowance in this area	Mapping shows site affected if Beeston Hall reservoir floods on a wet day.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Holiday accommodation and drinking establishments: more vulnerable. Retail: less vulnerable. Restaurants: less vulnerable.	Exception Test not required.	On site, yes.	All of these proposed uses are not appropriate in Flood Zone 3b. There is therefore a need for a Sequential Approach to the layout of development to ensure that less vulnerable and more vulnerable land uses are sited in areas of the site that are mapped as Flood Zone 1 and 2 Passes sequential test.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBHOV4: BeWILDerwood Adventure Park	BeWILDerwood Adventure Park	Mostly flood zone 1. Some EA2.	SFRA does not show climate change allowance in this area	Mapping shows site affected if Beeston Hall reservoir floods on a wet day.	Central part of BeWILDwewood affected by surface water.	Area susceptible to groundwater flooding – less than 25%	Office buildings: less vulnerable  Eating establishments: presume cafes so less vulnerable  Play areas: presume outdoor sport and recreation, so water compatible.	Exception Test not required.	On site, yes if needed.	Passes sequential test. A sequential approach will be required for development within the site.
PUBHOV5: Hoveton Town Centre and areas adjacent to the Town Centre	Town Centre	Part modelled 3b. Some more EA zone 2	SFRA does not show climate change allowance in this area	Mapping shows site affected if Beeston Hall reservoir floods on a wet day.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Shops in general are less vulnerable.  Drinking establishments and hotels are more vulnerable.  Housing is also more vulnerable.	Less vulnerable and more vulnerable in flood zone 2 - Exception Test not required.  More vulnerable in 3a - Exception Test required.  More vulnerable in 3b – should not be permitted	Within the town centre, yes.	Passes sequential test. Note that the town centre is located where it is, and the policy seeks to guide development and change in the town centre. Policy requires site specific flood risk assessment as appropriate. Note that some more vulnerable uses in 3a would need Exception Test. There is therefore a need for a Sequential Approach to the layout of development to

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
										ensure that less vulnerable and more vulnerable land uses are sited in areas of the site that are mapped as Flood Zone 1 and 2. Passes sequential test. Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.
PUBNOR1: Utilities Site	Mixed use scheme including dwellings.	Most 1. Very small parts 2. Small riverside strip modelled 3b.	Site at risk when consider climate change. 1% aEP with 65% climate change and 0.1% AEP with 25% climate change.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – more than 25% and more than 75%	More vulnerable.	Exception Test not required.	On site, yes if needed.	Passes sequential test. A sequential approach will be required for development within the site.
PUBNOR2: Riverside walk and cycle path	Walking and cycling route.	EA zone 2	Site at risk when consider climate change. 1% AEP with 65% climate change and 0.1% AEP	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Mapping does not show the site affected by surface water.	Area susceptible to groundwater flooding – more than 25% and more than 75%	Water compatible as presume outdoor recreation.	Exception Test not required.	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			with 25% climate change.							
PUBORM1: Ormesby waterworks	Waterworks.	Part EA2 and 3 and indicative 3b.	SFRA does not show climate change allowance in this area	Does not seem that reservoir flooding affects the sites, although it could come close to the site.	Very small part of site affected by surface water flooding.	Mapping does not show area susceptible to groundwater flooding.	Less vulnerable and water compatible depending on precise operation.	Less vulnerable in 1, 2, 3a and water compatible - Exception Test not required.  Less vulnerable in 3b, should not be permitted.	On site, yes.	Passes sequential test.  Policy refers to flood risk.
PUBOUL1: Boathouse Lane Leisure Plots	Leisure plots.	Small part SFRA 3b and EA 3. More EA 2.	SFRA shows part of area affected when consider climate change for tidal event. 1 in 200-year event with climate change.	Mapping does not show the site is affected by reservoir flooding.	Very small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25%	Amenity open space so water compatible.	Exception Test not required.	On site, yes.	Passes sequential test
PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Mixed use scheme including dwellings and employment.	Part EA zone 2 and 3.	SFRA shows part of area affected when consider climate change for tidal event. 1 in 200-year event with	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water. Some on the road frontage.	Mapping does not show area susceptible to groundwater flooding.	Employment – less vulnerable.  Dwellings – more vulnerable.	Employment – Exception Test not required.  Dwellings – Exception Test.	On site, yes.	Passes sequential test.  Refer to the need for a site-specific flood risk assessment and sequentially locating development on site to reflect flood risk in policy.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			climate change.							<p>Note that the policy seeks to regenerate brownfield land. This site is quite prominent in Oulton Broad and has been run down and not in use for some time. It is fair to say that the local community, as well as the Broads Authority, want this site to be developed.</p> <p>Scheme has planning permission.</p> <p>EA requested the scale of development be included in the policy – policy now says similar or equal scale to the permission.</p>
PUBOUL3 - Oulton Broad District Shopping Centre	District Shopping Centre	Most. SFRA 3b. EA zone 2 and 3.	SFRA shows part of area affected when consider climate change for tidal event. 1 in 200-year event with	Mapping does not show the site is affected by reservoir flooding.	Some of site affected by surface water flooding.	Mapping does not show area susceptible to groundwater flooding.	Shops in general are less vulnerable. Drinking establishments and hotels are more vulnerable. Housing is also	Exception test if in 3a if more vulnerable land use. Less vulnerable in 3a, no exception test required. More vulnerable and less	Within the district centre, to some extent, yes.	<p>Passes sequential test.</p> <p>Residential need to pass Exception Test if in 3a.</p> <p>Note that the district centre is located where it is, and the policy seeks</p>

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			climate change.				more vulnerable.	vulnerable in 3b, should not be permitted.		<p>to guide development and change in the district centre.</p> <p>Policy refers to flood risk.</p> <p>Individual proposals should consider the Sequential Test at the application stage.</p> <p>Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.</p>
PUBPHRB1: Bridge Area	Bridge Area	<p>Most of area indicative 3b.</p> <p>Area near bridge, to south of river, modelled 3b.</p> <p>EA – entire area 3.</p>	SFRA does not show climate change allowance in this area	Affected on a wet day if Back of Hall Reservoir floods according to mapping.	Small part of site affected by surface water flooding.	Mapping does not show area susceptible to groundwater flooding.	<p>Shops in general are less vulnerable. Drinking establishments and hotels are more vulnerable. Housing is also more vulnerable. Boatyards (presume marinas) are water compatible.</p>	<p>More vulnerable in 3a needs exception test, in 3b should not be permitted.</p> <p>Less vulnerable in 3a, does not require exception test and in 3b should not be permitted.</p> <p>Water compatible – exception test not required.</p>	<p>Depends on what a site-specific FRA ascertains in terms of the indicative 3b area.</p>	<p>Passes sequential test. Although individual proposals should consider the Sequential Test at the application stage</p> <p>But some development may need Exception Test.</p> <p>Note that the land uses in the entire Bridge area policy area are located where they are, and</p>

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
										<p>the policy seeks to guide development and change in that area. It does not promote certain land uses and refers to proposals needing to reflect the flood risk.</p> <p>Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.</p>
PUBPHRB2: Waterside plots	Waterside plots. Some with chalets, some for mooring and some undeveloped.	Modelled 3b.	SFRA does not show climate change allowance in this area	Affected on a wet day if Back of Hall Reservoir floods according to mapping.	Mapping does not show the site affected by surface water. Some on the road frontage.	Mapping does not show area susceptible to groundwater flooding.	<p>Undeveloped, presume amenity open space so water compatible.</p> <p>With chalets (including gardens<sup>2</sup>) – more vulnerable.</p>	<p>Undeveloped – exception test not required.</p> <p>New chalets – should not be permitted.</p>	No as the entire plot tends to be subject to flood risk.	<p>Policy seeks mainly to maintain or improve the current situation. Does not seek significant change. Does not promote new build but refers to replacement. Again, these chalets are already in place. So, policy passes sequential test. Also, the policy itself states the requirement for consistency with</p>

<sup>2</sup> Note that the EA usually consider residential gardens to also be ‘more vulnerable’ due to permitted development rights.



Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
										policies on flood risk.
PUBPHRB3: Green Bank Zones	Green bank zones.	3b	SFRA does not show climate change allowance in this area	Affected on a wet day if Back of Hall Reservoir floods according to mapping.	Mapping does not show the site affected by surface water. Some on the road frontage.	Mapping does not show area susceptible to groundwater flooding.	Presume amenity open space so water compatible.	Exception test not required.	N/A.	Passes sequential test
PUBSOL1: Riverside area moorings	Moorings and mooring plots.	3b	SFRA does not show climate change allowance in this area	Affected on a wet day if Reeders Reservoir floods according to mapping.	Some of site affected by surface water flooding.	Mapping does not show area susceptible to groundwater flooding.	For the mooring of boats so presume similar to boatyards and marinas so water compatible. Also, part amenity open space.	Exception test not required.	N/A.	Passes sequential test
PUBSOM1: Somerleyton Marina Residential Moorings	Residential moorings.	3b	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Mapping does not show the site affected by surface water.	Mapping does not show area susceptible to groundwater flooding.	These are considered as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable.	The marina assessment indicates that Exception Test not required, and the residential element indicates that Exception Test required.	No as it is people living on boats which then are on water.	The EA's interpretation passes the sequential test. Looking at the residential element in isolation, it does not.  To reflect that this policy relates to people living on boats on water, the supporting text of the generic residential moorings

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
										policy emphasises the issue of mooring technique and also the need for Flood Response Plans.
PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)	Boatyard, employment use and residential moorings.	EA zone 2 and 3.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Some of site affected by surface water flooding.	Area susceptible to groundwater flooding – more than 25% and more than 75%	Employment – less vulnerable. Boatyards – water compatible. Residential moorings - These are considered as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable.	The marina assessment indicates that Exception Test not required, and the residential element indicates that Exception Test required.	N/A – for general boatyard use. Resi moorings: No as it is people living on boats which then are on water.	Passes sequential test for general boatyard uses.  In terms of residential moorings: The EA's interpretation passes the sequential test. Looking at the residential element in isolation, it does not.  To reflect that this policy relates to people living on boats on water, the supporting text of the generic residential moorings policy emphasises the issue of mooring technique and also the need for Flood Response Plans.
PUBTSA1: Cary's Meadow	Open space	Mostly 1, small part modelled 3b and 2 (EA).	SFRA show area affected by fluvial climate	Affected on a wet day if Heigham Large Deposit Reservoir floods	Some of site affected by	Area susceptible to groundwater	Water compatible as	Exception Test not required	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			change: 1% AEP with 35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	according to mapping.	surface water flooding.	flooding – 25% to 50%	amenity open space.			
PUBTSA2: Thorpe Island	Thorpe Island – boatyard, moorings and open space.	EA – most 2 and 3. SFRA shows most modelled 3b.	SFRA show area affected by fluvial climate change: 1% AEP with 35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – 25% to 50%	Generally, water compatible (moorings, basins and boatyards). Also some open space.  There is a house – more vulnerable.	Exception Test not required as policy does not promote any new more vulnerable development.	Potentially, on the island.	Passes sequential test. May need Exception Test if more vulnerable, although this is not likely.
PUBTSA3: Griffin Lane – boatyards and industrial area	Boatyard and dockyard.	All EA zone 2. Most SFRA modelled 3b and EA zone 3.	SFRA show area affected by fluvial climate change: 1% AEP with 35% climate change, 1% AEP with 65% climate	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – 25% to 50%	Docks and boatyards so water compatible.	Exception Test not required	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			change and 0.1% AEP with 25% climate change.							
PUBTSA4: Bungalow Lane – mooring plots and boatyards	Mooring plots and boatyards.	All SFRA modelled 3b, EA 2 and EA 3.	SFRA show area affected by fluvial climate change: 1% AEP with 35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – less than 25% and 50 to 75%	Presume amenity open space so water compatible.  Boatyard water compatible too.	Exception Test not required	N/A.	Passes sequential test
PUBTSA5: River Green Open Space	Open space.	Part SFRA modelled 3b, EA zone 2 and 3.	SFRA show area affected by fluvial climate change: 1% AEP with 35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	Affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – 25% to 50%	Water compatible as amenity open space.	Exception Test not required	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBTHU1: Tourism development at Hedera House, Thurne	Dwellings.	Small part EA zone 3 and SFRA indicative 3b. More is EA zone 2. Rest is 1.	SFRA does not show climate change allowance in this area	Mapping does not show the site is affected by reservoir flooding.	Very small part of site affected by surface water flooding mainly on boundaries.	Mapping does not show area susceptible to groundwater flooding.	More vulnerable.	Exception test required for part in 3/indicative 3b. Development is appropriate for FZ 2 and 1 areas of site.	On site, yes.	<p>Passes sequential test. Although individual proposals should consider the Sequential Test at the application stage</p> <p>Refer to the need for a site-specific flood risk assessment and sequentially locating development on site to reflect flood risk in policy.</p> <p>Note that the policy seeks to regenerate brownfield land. This site is quite prominent in Oulton Broad and has been run down and not in use for some time. It is fair to say that the local community, as well as the Broads Authority, want this site to be developed.</p>
PUBWHI1: Whitlingham Country Park plus adjacent land	Country Park.	Generally, other than a small part near the little	SFRA show area affected by fluvial climate change: 1% AEP with	Partly affected on a wet day if Heigham Large Deposit Reservoir floods	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – 0% to 50%	Amenity open space, recreation and sport and changing facilities water	Exception Test not required	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
		Broad, land is flood zone 1.	35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	according to mapping.			compatible. Café less vulnerable. Car park less vulnerable.			
PUBWHI2: Land at Whitlingham Lane	Boatyard or use compatible with location.	Very small part SFRA modelled 3b and EA zone 3. A bit more EA zone 2.	SFRA show area affected by fluvial climate change: 1% AEP with 35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	Partly affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Small part of site affected by surface water flooding.	Area susceptible to groundwater flooding – 0% to 50%	Class E varies from more vulnerable to less vulnerable, so depends on the actual use. Policy does not specify a land use.  Boatyard is water compatible.	Most of the site is 2 or 1, so Exception Test not required.	Yes, as part of site that is 3 is very small.	Passes sequential test. But will need a sequential approach to development on site.
PUBSSTRI: Trinity Broads	Trinity Broads. Seeks quiet recreation.	All SFRA indicative 3b, EA zones 2 and 3.	SFRA does not show climate change allowance in this area	Partly affected on a wet and dry day if Ormesby Subsidence Reservoir floods	Some parts of area affected by Surface Water.	Mapping does not show area susceptible to groundwater flooding.	Presume amenity open space so water compatible.	Exception Test not required.	N/A.	Passes sequential test  An area wide policy that seeks to guide what can go there, not identifying specific land uses.
PUBSSUT: Upper Thurne	Upper Thurne. Seeks quiet recreation	All SFRA indicative 3b, EA zones 2 and 3.	SFRA show area affected by tidal climate	Mapping does not show the site is	Some parts of area affected by Surface Water.	Small part of area 0 to 50%.	Presume amenity open	Exception Test not required.	N/A.	Passes sequential test.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			change: 0.5% AEP climate change and 0.1% climate change.	affected by reservoir flooding.			space so water compatible.			An area wide policy that seeks to guide what can go there, not identifying specific land uses.
PUBSSPUBS: Pubs network	Seeks to protect waterside pubs.	Various, but generally flood zone 3 and indicative or modelled 3b.	Depending on the pub, some are affected by tidal climate change, some by fluvial climate change and some not shown through the SFRA to be affected.	Many pubs in the Broads. Some may be affected by reservoir flooding.	Some pubs may be affected by surface water.	Depending on location, pubs may not be susceptible, or less than 25%, 25-50%.	More vulnerable	Policy relates to protecting what is already there. Any changes could be not appropriate or need an Exception Test, depending on the detail and the site-specific flood risk.	Potentially for new development, although pubs are already there.	Note that pubs are already there, and policy emphasises importance of flood risk. Passes sequential test. Any changes could be not appropriate or need an Exception Test, depending on the detail and the site-specific flood risk. Also, the policy itself states the requirement for consistency with policies on flood risk. Depending on the proposal and location on site, an Exception Test may be needed as part of planning application.
PUBSSROADS: Main road network	Main road network. Seeks to protect the network.	Various, but generally flood zone 3 and indicative or modelled 3, some 2 and some 1.	Depending on the road, some are affected by tidal climate change, some by	Some parts of the main road network affected by reservoir flooding. Some parts not.	Some roads may be affected by surface water flooding.	Some roads may be affected by groundwater flooding.	Essential infrastructure. Measures could fall within the "flood control infrastructure" cited within the	Presume that the network is essential transport infrastructure. Exception Test required if in 3a and 3b.	N/A	Policy relates to existing network which is there already. Passes sequential test

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			fluvial climate change and some not shown through the SFRA to be affected.				'Water-compatible development' flood vulnerability class if they are secondary measures to protect infrastructure that already exists. A new or replacement road, or works to raise the level of the road, might be classed as 'Essential Infrastructure'.			
PUBSSTRACKS: Former rail trackways	Three routes of former railways are safeguarded for future walking, cycling and horse-riding routes.	Most in 2, some could be in EA 3 and indicative and modelled 3b.	Depending on the track, some are affected by tidal climate change, some by fluvial climate change and some not shown through the SFRA to be affected.	Belton/Bradwell – not affected.  Haddiscoe link - wet day, Readers Reservoir  Aldeby link – wet day, Ditchingham Lake.  Geldeston link – wet day, Ditchingham Lake.	Some parts of trackways may be affected by surface water flooding.	Some parts of trackways may be affected by groundwater flooding.	Presume outdoor sport and recreation so water compatible.	Exception Test not required.	N/A.	Passes sequential test



Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBSSSTATIONS: Railway stations/halts	Stations protected in current use. Criteria for any proposals at these sites.	Wroxham/Hoveton -1 Berney Arms, Haddiscoe, Somerleyton, Buckenham – SFRA indicative 3b, EA 2 and 3.	Depending on the halt, some are affected by tidal climate change, some by fluvial climate change and some not shown through the SFRA to be affected.	Wroxham/Hoveton, Buckenham, Somerleyton, Berney Arms – not affected.  Haddiscoe – wet day, Reeders Reservoir.	Some halts may be affected by surface water.	Depending on location, halts may not be susceptible, or less than 25%.	Presume waiting areas and other land uses at the station could be the same as shops so less vulnerable.	Depending on the proposal and the precise location, may need Exception Test or should not be permitted.	N/A.	Passes sequential test.  Policy does not prescribe land uses. Policy refers to flood risk.
PUBSSSTAITHES: Staithes	Protects staithes and allows enhancements.	FZ1,2,3a and 3b depending on individual sites.	Policy does not identify the locations of these.	Policy does not identify the locations of these.	Policy does not identify the locations of these.	Policy does not identify the locations of these.	Water compatible.	Exception Test not required.	N/A.	Passes sequential test
PUBSSCOAST: The Coast	The Coast. Seeks quiet recreation and low-key structures.	Indicative and modelled 3b, EA 2 and 3.	SFRA show area affected by tidal climate change: 0.5% AEP climate change and 0.1% climate change.	Mapping does not show the site is affected by reservoir flooding.	Small part of site affected by surface water flooding.	Mapping does not show area susceptible to groundwater flooding.	Presume amenity open space or structures associated with recreation so water compatible.	Exception Test not required.	N/A.	Passes sequential test
PUBSSMILLS: Drainage Mills	Seeks to protect mills.	Various, but generally flood zone 3 and indicative or modelled 3, some 2 and some 1.	Depending on the mill, some are affected by tidal climate change, some by fluvial	Many mills in the Broads. Some may be affected by reservoir flooding.	Some mills may be affected by surface water.	Depending on location, mills may not be susceptible, or less than 25%, 25-50%.	Depends on the usage. Policy does not state what they should be used as but emphasises flood risk. If in	Depends on the usage.	Potentially for ancillary development, but the mills are there already.	Policy does not specify a land use. Mills are already in place. Flood risk emphasised as an issue.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			climate change and some not shown through the SFRA to be affected.				use for operational drainage purposes, these will fall within the 'Water-compatible' vulnerability class as they are effectively similar to water transmission infrastructure and pumping stations.			<p>If they are not functional or proposed to be made functional again, then the development class should be appropriate to the flood zone, i.e. no forms of vulnerable development if the building/site is in Flood Zone 3b. If deemed water-compatible (i.e. used solely as a drainage mill), the Exception Test will not be required, but these should still be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul>

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
PUBSSLGS: Local Green Space	Local Green Spaces - protected	Various, but generally flood zone 3 and indicative or modelled 3, some 2 and some 1.	SFRA does not show climate change allowance in this area	Many local green spaces in the Broads. Some may be affected by reservoir flooding.	Some spaces may be affected by surface water.	Depending on location, local green spaces may not be susceptible, or less than 25%, 25-50%.	Water compatible.	Exception Test not required.	This policy protects local green space that is already in place.	Passes sequential test.
Policy PUBSSA47: Road schemes on the Acle Straight (A47T)	Provides a framework for changes to guide changes to the A47.	Indicative 3b. EA 2 and 3.	Site affected by Tidal climate change: 0.5% APE and 0.1% AEP.	Mapping does not show the site is affected by reservoir flooding.	Some parts of the A47 may be affected by surface water.	Mapping does not show area susceptible to groundwater flooding.	Could be classed as essential transport infrastructure.	Exception test required.	If dualling for example, no as the A47 is where it is.	Exception test required.  Essential transport infrastructure (as with water-compatible uses) that has passed the Exception Test should also be designed and constructed to: <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul>
Oulton Broad Development Boundary	Development boundaries in principle enable housing, employment	Various, but generally flood zone 3 and indicative or	SFRA shows part of area affected when consider	Mapping does not show the site is affected by reservoir flooding.	Some parts of the development boundary may	Mapping does not show area susceptible to	Dwellings – more vulnerable	Depends on proposal and location. Other policies in local plan used as	Yes.	The Authority raises the importance of flood risk as well as other policies even though different

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
	and residential moorings but subject to other policies.	modelled 3, some 2 and some 1. Residential moorings, 3b.	climate change for tidal event. 1 in 200-year event with climate change.		be affected by surface water.	groundwater flooding.	Employment – less vulnerable  Residential moorings – These are considered as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable	appropriate to determine applications, in particular the flood risk policy.		types of development are theoretically acceptable in development boundaries. Whether the sequential test is passed or an Exception Test is needed will depend on the proposal and the location.
Hoveton and Wroxham Development Boundary			SFRA does not show climate change allowance in this area	Part of Hoveton and Wroxham affected on a wet day if Beeston Hall Reservoir floods according to mapping.	Some parts of the development boundary may be affected by surface water.	Area susceptible to groundwater flooding – 0% to 25%				
Thorpe St Andrew Development Boundary.			SFRA show area affected by fluvial climate change: 1% AEP with 35% climate change, 1% AEP with 65% climate change and 0.1% AEP with 25% climate change.	Part of Thorpe St Andrew affected on a wet day if Heigham Large Deposit Reservoir floods according to mapping.	Some parts of the development boundary may be affected by surface water.	Area susceptible to groundwater flooding – 25 to 50%				
PUBDM9: Open space on land, play space, sports fields and allotments.	Allotments, sports fields, play areas – protected.	Various, but generally flood zone 3 and indicative or	Depending on the open space, some are affected by tidal climate	Many open spaces in the Broads. Some may be affected by reservoir flooding.	Some spaces may be affected by surface water.	Depending on location, open spaces may not be susceptible, or	Water compatible.	Exception Test not required.	This policy protects open space that is already in place.	Passes sequential test.

Policy and location	Brief description	Flood zone (tidal and fluvial)	Consider climate change	Reservoir flooding	Surface water flooding	Groundwater flooding	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
		modelled 3, some 2 and some 1.	change, some by fluvial climate change and some not shown through the SFRA to be affected.			less than 25%, 25-50%.				

## Appendix 1: Comments received as part of technical consultation

A technical consultation whereby Norfolk and Suffolk LLFAs and the Environment Agency were asked for comments, was held in April 2024. The comments received are as follows.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Environment Agency	1: Introduction	The introduction states: “This Sequential Test has been produced to address the requirements of the NPPG”. It is worth stating here that the Sequential Test is also a planning policy requirement of the National Planning Policy Guidance (NPPF) as set out in paragraphs 167 and 168.	Agreed.	Text added to the introduction.
Environment Agency	2. What is the ‘Sequential Approach’?	We recommend preceding the NPPG text in this section with the policy text from paragraph 167 of the NPPF to ensure that both “policy” and “practice/approach” are covered here.	Agreed.	Text added to section 2.
Environment Agency	POACL1	POACL1 states that the vulnerability class of cemeteries is not specifically covered and suggest they might be classified as ‘water compatible’. While it is true that cemeteries are not specifically identified in NPPF Annex 3: Flood risk vulnerability classification, we would suggest that they could be considered	Agreed.	Vulnerability class changed. No other changes to the assessment.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		as 'more vulnerable'. This is due to the water pollution risk.		
Environment Agency	POBRU1, POBRU2, POBRU3, POBRU4, POBRU5, POBRU6, POCHE1, PODIL 1, PODIT1, PODIT2, POGIL1, POHOR3, POHOR4, POHOR5, POHOR6, POHOR7, POHOV1, POLOD1, PONOR2, POORM1 ("depending on precise operation"), POOUL1, POPHRB3, POSOL1, POSOM1, POSTA1, POTSA1, POTSA2 (unless more vulnerable development is proposed), POTSA3, POTSA4, POTSA5, POWHI1 (aside for café and car park), POSSTRI, POSSUT,	<p>This policy states that the Exception Test is not required for mooring plots. Although the Exception Test not required for water-compatible uses, it is worth highlighting that these should still be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> </ul> <p>This is set out in paragraph 079 of the NPPG.</p>	Agreed.	<p>A new section added to the sequential test that refers to water compatible uses.</p> <p>Wording added to DM7 of Local Plan.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
	POSSTRACKS, POSSSTAITHES, POSSCOAST, POSSLGS, PODM9			
Environment Agency	Residential moorings: BRU6, CHE1, GIL1, LOD1, SOM1, STA1	<p>POBRU6 states “The EA’s interpretation passes the sequential test. Looking at the residential element in isolation, it does not.” In all cases (BRU6, CHE1, GIL1, LOD1, SOM1, STA1) we would not question an LPA’s assertion that the physical moorings and associated infrastructure are ‘water compatible’. The LPA should consider the treatment of ‘boats’ within planning, and any distinction between boats and other floating residential structures.</p> <p><i>EA asked for clarification and said:            The comment was just to highlight that you may consider the vulnerability of those living on a vessel deemed to be a ‘boat’ differently to those living on a ‘houseboat’ or other floating structure. However, that point is appropriately captured in the text supporting the (current) DM37 and (proposed) PODM45 – as you have said. Regarding the residential</i></p>	Comment noted. Clarification appreciated.	No change to sequential test.



Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<i>moorings, we're satisfied that moorings are Water Compatible and that the Sequential Test is passed.</i>		
Environment Agency	POCAN1	POCAN1 is deemed to pass the sequential test. This should only be concluded provided the development is sited outside of Flood Zone 3b. Development should not be permitted if within FZ3b, as set out in Table 2, paragraph 079 of the NPPG. Furthermore, development should be sequentially located within the site, based on the site-specific flood risk assessment.	Agreed.	Add this wording to the policy and sequential test.
Environment Agency	PODIT1	<p>PODIT1 states the drinking establishment is more vulnerable. If the site were to be redeveloped in its entirety, the whole site would need to be considered as the most vulnerable use of all the component parts (more vulnerable), as set out in paragraph 079 of the NPPG). This policy is for retention of uses and improved facilities. Individual elements brought forward separately can be classified under the most relevant vulnerability.</p> <p><i>EA asked for clarification:</i></p>	<p>Noted, but what does this mean for the policy and sequential test?</p> <p>Agreed and noted – add to sequential test. And add some wording about sequential test to policy.</p>	<p>Make change to sequential test.</p> <p>Add sequential test wording to policy.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p><i>If the policy stipulates that the sequential approach should be applied on the site and that all built development elements are to be outside FZ2&amp;3 then the Sequential Test is passed. Outdoor sports could be in FZ but if (for example) the policy were to allow for a redeveloped 'drinking establishment' in the FZ then you would have to explain in the conclusions column why there is no other site elsewhere at lower risk that could be used to pass this ST.</i></p>		
Environment Agency	POFLE1	<p>PODIT1 states the drinking establishment is more vulnerable. If the site were to be redeveloped in its entirety, the whole site would need to be considered as the most vulnerable use of all the component parts (more vulnerable), as set out in paragraph 079 of the NPPG). This policy is for retention of uses and improved facilities. Individual elements brought forward separately can be classified under the most relevant vulnerability.</p> <p>This also applies to POFLE1, which states "All built development would be outside the</p>	<p>Agreed and noted – add to sequential test.</p> <p>Agreed, although sequential test changed to 'all built development would adopt a sequential approach to development on site'.</p>	<p>Make change to sequential test.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>flood zones". Presumably this means outside of Flood Zones 2, 3a and 3b. It would be clearer to state "all built development will be located in Flood Zone 1, adopting a sequential approach to development on site".</p>		
Environment Agency	POGTY1	<p>POGTY1 is described as "Most flood zone 1, very small part zone 2 and indicative (typo) 3b. EA does show entire area as 2 and 3." Further clarity on this required. The Flood Map for Planning and the 2017 SFRA show this site to be FZ3, with the SFRA also showing an area of partial indicative FZ3b.</p> <p>The table also concludes that it is "not clear if passes sequential test". It is difficult to apply the Sequential Test at this stage if the end use is not known and the nature of the risk affecting the site is unclear. The Sequential Test conclusion should make clear why this site has been identified for potential development rather than sites at lower flood risk.</p> <p>The Local Plan policy could further define acceptable development types based on a</p>	<p>Regarding flood zones – agree.</p> <p>Regarding sequential test conclusion – agree.</p> <p>Regarding sequential test and development type – agree.</p>	<p>Clarify flood zones in sequential test and supporting text of policy.</p> <p>Improve sequential test conclusion.</p> <p>Add text to sequential test and policy to say that the sequential test may need to be applied at the application stage as the final land use is not specified in the policy.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		more focused Sequential Test, or a Sequential Test may need to be applied at the application stage.		
Environment Agency	POHOV2	We recommend that a Flood Warning and Evacuation/Response Plan is developed and operated for car parking sites, such as POHOR1, POHOV2 and POWHI1. Paragraphs 043 to 048 of the NPPG provide useful advice on this.	Agreed.	Amend sequential test and policy to require flood response plan.
Environment Agency	POWHI1			
Environment Agency	POHOR1			
Environment Agency	POHOR3	POHOR3 states “Mooring plots and gardens - presume similar to amenity open space so water compatible development”. We would usually consider residential gardens to also be ‘more vulnerable’ due to permitted development rights.	Regarding permitted development rights, agree.	Amend sequential test to say more vulnerable due to permitted development rights and improve sequential test as needed.
Environment Agency	POPHRB2			
Environment Agency	POSSPUBS	This policy also states “Chalets – policy only allows extensions (typo) and replacements, not new.” Please note the references to development footprint in Policy DM5 of the Local Plan and its associated footnote and supporting text. Please also note the guidance given in Section 6.8 of the Broads Authority Flood Risk SPD which relates to the	Agree; amend sequential test to reflect that flood risk referred to in policy HOR3, PHRB2, SSPUBS.  Amend typo.	Amend sequential test to reflect that flood risk referred to in policy HOR3.  Amend typo.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>existing footprint of development in Flood Zone 3b and Permitted Development (PD).</p> <p>EA asked for clarification:</p> <p><i>The conclusions column should make it clear that the sequential test is passed for POHOR3 as the policy itself states the requirement for consistency with policies on flood risk – i.e. the need for any proposed changes to be in line with Policy DM5 of the Local Plan (PODM7 in the emerging Plan) and its associated footnote and supporting text, particularly with reference to replacement dwellings/buildings and also to Section 6.8 of the Broads Authority Flood Risk SPD which relates to the existing footprint of development in Flood Zone 3b and Permitted Development (PD). The reference to Horning WRC preventing any net new dwellings is also relevant, as already set out.</i></p> <p>Table 1 of the NPPG states that Flood Zone 3b is “land where water from rivers or the sea has to flow or be stored in times of flood” Extensions to buildings within Flood Zone 3b</p>		

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>can reduce the capacity of the Functional Flood Plain to store flood water and raise the potential for flood risk to be increased elsewhere. The footnote to Table 2 in the NPPG states “In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• not impede water flows and not increase flood risk elsewhere”</li> </ul> <p><i>EA asked for clarification:</i></p> <p><i>As above, the conclusions section should make clear that POHOR3, POPHRB2 and POSSPUBS pass the ST as they all include requirements comply with flood risk policies. Of particular relevance for these sites in FZ3b - Policy DM5 of the Local Plan (PODM7 in the emerging Plan) and its associated footnote and supporting text, particularly with reference to replacement dwellings/buildings</i></p>		

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p><i>and also to Section 6.8 of the Broads Authority Flood Risk SPD which relates to the existing footprint of development in Flood Zone 3b and Permitted Development (PD).</i></p> <p>This advice regarding development in Flood Zone 3b is also relevant to policies POPHRB2 and POSSPUBS.</p>		
Environment Agency	POHOR8	<p>POHOR8 states the Exception Test is not required. We have no issue with this as this policy is for the retention of existing uses. However, the Exception Test would usually apply for the “more vulnerable” part of the development if part of the site is in Flood Zone 3. See footnote to Table 2 of the NPPG which states that “Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts”.</p> <p><i>EA asked for clarification: Rather than stating that the Exception Test is not required, it should be stated specifically</i></p>	Agree, although the NPPF does say the words that it is not required. Say both phrases.	Change sequential test to say: Exceptions test not required/ <u>does not apply.</u>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<i>that the Exception Test doesn't apply as the policy is for the retention of existing uses.</i>		
Environment Agency	POHOV3	POHOV3 states the Exception Test is not required. We agree with this, provided all the development is to be located in Flood Zone 2. All of these proposed uses are not appropriate in Flood Zone 3b and text should reflect this and advocate that a Sequential Approach to the layout of development needs to ensure that less vulnerable and more vulnerable land uses are sited in areas of the site that are mapped as Flood Zone 1 and 2. Unless all built development is directed to Flood Zone 1, the conclusion that this policy passes the Sequential Test should include text to demonstrate why there are no other suitable available alternative sites at lower risk than Flood Zone 2 that could facilitate this development.	Agree.	Make clear in sequential test and policy that all of the proposed uses are not appropriate in Flood Zone 3b, and text should reflect this and advocate that a Sequential Approach to the layout of development needs to ensure that less vulnerable and more vulnerable land uses are sited in areas of the site that are mapped as Flood Zone 1 and 2.



Organisation	Section of the draft Sequential Test	Comment	Response	Action
Environment Agency	POHOV4 PONOR1	<p>POHOV4 states development can be allocated in lowest risk sites “if needed”. NPPF policy directs for development to be sited in lowest risk areas where possible. “If needed” seems rather weak. This advice also applies to PONOR1.</p> <p><i>EA asked for clarification: Bear in mind that for HOV4 the site is FZ1 &amp; FZ2. For NOR1 only very small parts of the site are FZ2 &amp; 3b. To be confident that the ST is passed, the conclusions section just needs to be clear that a sequential approach will be required for development within the site. The draft policies do refer to addressing flood risk / complying with flood risk policies. But the supporting text could make clear that this includes a sequential approach to siting development.</i></p>	Agree.	Amend sequential test conclusions cell. Add sequential approach to siting development to policies.
Environment Agency	POHOV5	We are satisfied that policy POHOV5 is acceptable but note that it refers to a range of potential development types in an area that has a range of flood zones. Therefore, individual proposals should consider the Sequential Test at the application stage. It is	<p>Range of development types and range of flood risk zones – agree.</p> <p>Add guidance to Local Plan policy supporting text.</p>	Amend sequential test and policy to say that individual proposals should consider the Sequential Test at the application stage.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>worth noting that this site also includes a significant area of Flood Zone 1, in addition to Flood Zones 2 and 3b. We are pleased to note the inclusion of text that that more vulnerable development should not be permitted in Flood Zone 3b.</p> <p>It should be noted that all “more vulnerable” development in Flood Zone 3a will normally require the Exception Test (as set out in Table 2 of the NPPG) unless it is householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) or a change of use application (with the exception of changes of use to a caravan and camping or chalet site). This is set out in footnote 60 of the NPPF.</p>		<p>Add guidance as stated to supporting text of HOV5.</p>
Environment Agency	POOUL2	<p>POOUL2 is stated to have passed the Sequential Test. However, we would like to highlight the need to consider Climate Change in the application of the Sequential Test, as set out in paragraphs 165, 167 and 168 of the NPPF. This is particularly important if land has the potential to become Flood Zone 3b within a development lifetime (and</p>	<p>Agreed. Policy to be amended to refer to the scale of development permitted being appropriate to the site, as well as additional text relating to sequential location of development.</p>	<p>Amend policy to refer to scale of development and sequential location of development.</p> <p>Amend sequential test to refer to say that test passed now policy refer to scale of</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>therefore inappropriate for a number of flood risk vulnerability classes).</p> <p><i>EA asked for clarification: You need to be sure that the site area for POOUL2 is big enough to accommodate the allocated Less Vulnerable and More Vulnerable development outside of FZ3b – including climate change. Does the land proposed for development have the potential to become Flood Zone 3b within a development lifetime (and therefore inappropriate for a number of flood risk vulnerability classes)?</i></p> <p><i>Although the ‘Reasoned Justification’ within the draft policy mentions the 2012 planning permission for “76 market dwellings, office accommodation, and moorings”, the policy wording itself does not specify the number of dwellings or scale of other development that would be permitted at this site. It may therefore not be appropriate to state that this site passes the ST without putting an upper limit on development. This could lead to complications if a planning application</i></p>	<p>Regarding tidal barrier – noted.</p> <p>The flood risk on the site could be assessed through a site-specific flood risk assessment and subsequently development sited sequentially.</p> <p>Regarding flood zone 2/3 and expanding text in sequential test – agree.</p>	<p>development and sequential location of development.</p> <p>Regarding tidal barrier – no change to sequential test or policy.</p> <p>Add text to refer to the need for a site-specific flood risk assessment and sequentially locating development on site to reflect flood risk to policy and sequential test.</p> <p>Expand on text relating to brownfield land and regeneration.</p> <p>Add test to supporting text about climate change having an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p><i>came forward for development in excess of the 2012 planning permission in future. The policy should look to provide more detail on the scale of development (particularly residential) that would be permitted at this site so that the ST can be fully considered.</i></p> <p>This is also particularly relevant if the site is not going to be defended as envisaged in earlier strategic plans, i.e. due to the current affordability of the Lowestoft tidal barrier.</p> <p><i>EA asked for clarification: We raised the issue of the Lowestoft tidal barrier more as something to consider when the site is developed in the future. The site may not be defended as (possibly) envisaged in earlier plans.</i></p> <p>The policy should also specify whether more and less vulnerable development is intended to be directed to Flood Zone 1 only.</p> <p>This Sequential Test conclusion should be clear on why this site in Flood Zone 2/3 is being brought forward for development and</p>		

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		that there are no suitable alternatives at lower risk. 'Regen of brownfield land' is referenced as a reason for the allocation but this should be expanded upon.		
Environment Agency	POOUL3	<p>We are satisfied that policy POOUL3 is acceptable. As with POHOV5, the policy refers to a range of potential development types in an area that has a range of flood zones. Therefore, individual proposals should consider the Sequential Test at the application stage.</p> <p>As with POOUL2, we would again like to highlight the need to consider Climate Change in the application of the Sequential Test for POOUL3.</p> <p><i>EA asked for clarification: This was to highlight that climate change will have an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage. But we're satisfied with the proposed ST &amp; policy amendments.</i></p>	Range of development types and range of flood risk zones – agree.	<p>Amend sequential test and policy to say that individual proposals should consider the Sequential Test at the application stage.</p> <p>Add test to supporting text about climate change having an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Environment Agency	POPHRB1	<p>POPHRB1 mentions “Housing is also more vulnerable.” However, this policy excludes new residential development.</p> <p>As with POOUL2 and POOUL3, we would again like to highlight the need to consider Climate Change in the application of the Sequential Test for POPHRB1.</p> <p><i>EA asked for clarification:</i></p> <p><i>This was to highlight that climate change will have an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</i></p> <p><i>Given the range of development types that could be brought forward in the area, we’d also suggest that the sequential test and policy be amended to say that individual proposals should consider the Sequential Test at the application stage.</i></p>	<p>Re housing – noted. But there is a house already on site and there is some holiday accommodation as well.</p> <p>Regarding climate change, agreed.</p>	<p>No change re housing.</p> <p>Amend policy and sequential test to say that individual proposals should consider the Sequential Test at the application stage.</p> <p>Add test to supporting text about climate change having an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</p>
Environment Agency	POTHU1	<p>As with POOUL2 above, POTHU1 does not specify whether the built residential development will be required to be located in Flood Zone 1 only.</p>	<p>The flood risk on the site could be assessed through a site-specific flood risk assessment and</p>	<p>Add text to refer to the need for a site-specific flood risk assessment and sequentially locating development on site</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>This Sequential Test conclusion should also be clear on why residential development in Flood Zone 2/3 is being promoted and why there are no suitable alternatives elsewhere at lower risk. ‘Regen of brownfield land’ is once again referenced as a reason for the allocation but this should be expanded upon. We note that the policy refers to enabling development.</p> <p>As with POOUL2, POOUL3, and POPHRB1, we would again like to highlight the need to consider Climate Change in the application of the Sequential Test for POTHU1.</p> <p><i>EA asked for clarification: This was to highlight that climate change will have an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage. The policy is clear that flood risk needs to be considered as part of any application &amp; it should be ensured that the sequential approach to development on site is part of that.</i></p>	<p>subsequently development sited sequentially.</p> <p>Regarding flood zone 2/3 and expanding text in sequential test – agree.</p>	<p>to reflect flood risk to policy and sequential test.</p> <p>Expand on text relating to brownfield land and regeneration.</p> <p>Add test to supporting text about climate change having an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Environment Agency	POWHI2	<p>POWHI2 does not specifically request that the small areas of Flood Zones 2 and 3 are avoided. We recommend the policy is amended to state this.</p> <p>As with POOUL2, POOUL3, POPHRB1 and POTHU1, we would again like to highlight the need to consider Climate Change in the application of the Sequential Test for POWHI2.</p> <p><i>EA asked for clarification: This was just to highlight that climate change will have an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</i></p>	<p>Regarding avoiding flood zones 2 and 3 – agree.</p> <p>Re climate change, agreed.</p>	<p>Add text to policy about avoiding flood zones 2 and 3.</p> <p>Add test to supporting text about climate change having an impact on the nature &amp; extent of flood risk and that this should be considered at the application stage.</p>
Environment Agency	POSSROADS	<p>POSSROADS is described as “Main Road network. Seeks to protect the network.” Such measures could fall within the “flood control infrastructure” cited within the ‘Water-compatible development’ flood vulnerability class if they are secondary measures to protect infrastructure that already exists. A new or replacement road, or works to raise</p>	<p>Noted and agree.</p>	<p>Amend sequential text in line with comment and the potential types of projects and their related vulnerability classifications.</p>



Organisation	Section of the draft Sequential Test	Comment	Response	Action
		the level of the road, might be classed as 'Essential Infrastructure'.		
Environment Agency	POSSSTATIONS	POSSSTATIONS is stated to pass the Sequential Test. However, this will depend upon the location, which is to be confirmed.	Comment noted. The locations are known and set out in the policy.	No change to sequential test or policy.
Environment Agency	POSSMILLS	<p>POSSMILLS is for drainage mills. If in use for operational drainage purposes, these will fall within the 'Water-compatible' vulnerability class as they are effectively similar to water transmission infrastructure and pumping stations. If they are not functional or proposed to be made functional again, then the development class should be appropriate to the flood zone, i.e. no forms of vulnerable development if the building/site is in Flood Zone 3b. If deemed water-compatible (i.e. used solely as a drainage mill), the Exception Test will not be required, but these should still be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> </ul>	Noted and agree.	<p>Amend policy to refer to site specific flood risk assessment and sequential test.</p> <p>Amend sequential text to reflect the comment relating to if in water transmission use, they are water compatible, but if another use, then depends on use and flood zone.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<ul style="list-style-type: none"> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul> <p>This is set out in paragraph 079 of the NPPG.</p>		
Environment Agency	POSSA47	<p>The Sequential Test for POSSA47 will have to demonstrate why the development needs to be located where proposed and why alternatives are not suitable. Essential transport infrastructure (as with water-compatible uses) that has passed the Exception Test should also be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul> <p><i>EA asked for clarification: We were highlighting the additional design and construction requirements for essential infrastructure that may need to be located in flood risk areas. These points could be added</i></p>	Agreed.	Add text to the sequential test and policy.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p><i>to the conclusions column i.e. as supplementary text to “Exception Test required” and/or to the supporting text of the policy.</i></p>		
Environment Agency	Development Boundary policy.	<p>The policies for ‘Oulton Broad Development Boundary’, ‘Hoveton and Wroxham Development Boundary’ and ‘Thorpe St Andrew Development Boundary’ need to consider Climate Change in the application of the Sequential Test, as detailed above. This could potentially represent a constraint to these policies if there is a significant change in the boundary of Flood Zone 3b, constraining the potential to deliver housing and employment.</p> <p>We note the policy describes the flood zone as “Various, but generally flood zone 3 and indicative or modelled 3”. This should be clarified to state “indicative or modelled 3b”.</p> <p>As noted in the conclusions, the Sequential Test will need to be applied if or when any applications for development in a flood zone come forward in these policy locations.</p>	Regarding describing the flood risk – agree.	Amend description of flood risk.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<i>EA asked for clarification: Some were really for reference regarding any future applications. Nothing further needed at this stage.</i>		
Norfolk County Council LLFA	Throughout	The LLFA notes that throughout the documents there are unreferenced quotes from NPPG. The LLFA recommends the paragraph number is included in the reference.	Agree.	Paragraph numbers added.
Norfolk County Council LLFA	Throughout	In addition, the LLFA notes the document references the secondary guidance rather than the policy requirements from NPPF. The LLFA would recommend that some referencing back to the NPPF would improve the strength and quality of the document.	Noted. We feel that there is adequate reference to the NPPF. In the absence of specific references and suggestions, no further action.	No change to sequential test.
Norfolk County Council LLFA	Throughout	In section 3, there is a typo that requires correction in the title which states 'Exceptions Test'. However, it should read Exception Test. The LLFA recommends the correction is applied to both the title and elsewhere in the document.	Agree.	Exception Test not Exceptions Tet.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Norfolk County Council LLFA		<p>It is clear in section 5 that only flooding from rivers and the sea has been considered.</p> <p>There is no justification provided for this approach in the document. NPPF in paragraph 167 (a) states</p> <p>"All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <p>(a) applying the sequential test and then, if necessary, the exception test as set out below;"</p> <p>Therefore, at present the information in section 5 is considered incomplete as not all sources of flood risk have been considered during the application of the sequential test. Further work is required.</p>	Agree.	Add a new column that talks about the site in question and all sources of flood risk.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Norfolk County Council LLFA	General comment	<p>In addition, in NPPF Paragraph 170 states</p> <p><i>"To pass the exception test it should be demonstrated that:</i></p> <p><i>(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and</i></p> <p><i>(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."</i></p> <p>This appears to indicate that an FRA is required to pass the exception test which is required to enable site allocation to occur.</p> <p>Furthermore, the guidance in NPPG for Flood Risk and Coastal Change in paragraph 31 states that</p> <p><i>"The Exception Test requires two additional elements to be satisfied (as set out in paragraph 164 of the National Planning Policy Framework) before allowing</i></p>	Comments noted and specific policy areas queried, and responses included as follows.	See following rows.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p><i>development to be allocated or permitted in situations where suitable sites at lower risk of flooding are not available following application of the sequential test."</i></p> <p>Therefore, the document will need to be updated to accurately reflect the national policy and guidance should the need for the exception test be required for any of the potential site allocations be considered. It is likely that the developer would need to undertake a suitable FRA to support the allocation process in the local plan.</p> <p>LLFA contacted for clarification: The LLFA are advising on the national policy requirements. In relation to the residential moorings, the exception test will need to be applied and passed prior to allocation. There are two parts of the exception test (as defined by NPPF paragraph 170) states that: "To pass the exception test it should be demonstrated that: (a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and</p>		

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."		
Norfolk County Council LLFA	Residential moorings	<p>For the residential mooring sites to be allocated, both parts of the exception test will need to be passed. It appears that an evidence base could prepare to demonstrate the wider sustainability benefits to the community that outweigh the flood risk. While a flood risk assessment could be prepared to provide evidence to demonstrate the site would pass part b.</p> <p>The guidance in PPG for Flood Risk and Coastal Change in paragraph 31 states that: <i>"The Exception Test requires two additional elements to be satisfied (as set out in paragraph 164 of the National Planning Policy Framework) before allowing development to be allocated or permitted in</i></p>	<p>In relation to residential moorings, The Government in the 2016 Planning Act tells us to find the need for those who live on boats and meet that need. And we set out in the supporting text that schemes will need an FRA and flood response plan and have how they are tethered and moored monitored. So they may need the exception test but have got to pass it as the Government tells us to find sites for resi moorings</p>	<p>Regarding residential moorings: add a general note in the sequential test and exception test about residential moorings.</p>



Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p><i>situations where suitable sites at lower risk of flooding are not available following application of the sequential test."</i></p> <p>The LLFA notes the guidance has not been update since the December 2023 update to NPPF, which is why it refers to the paragraph 164, the previous number of paragraph 170. As can be seen, NPPF and its supporting guidance clearly requires the need for this information to be provided to support the allocation of sites.</p>	<p>which are residential in flood zone3b.</p>	
<p>Norfolk County Council LLFA</p>	<p>DIT1 and FLE1</p>	<p>NPPF Guidance is clear that developments must be assessed based on the proposed use and associated vulnerability class of the proposed development.</p> <p>On the scenario indicated in the enquiry where the applicant may wish to submit an altered planning application compared to the local plan allocation, the policy is clearly presented in paragraph 172. It states: "Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need</p>	<p>In terms if DIT1 and FLE1 We are not promoting any kind of development. We are protecting it as a sports facility and saying the considerations that any proposals they want to come forward need to consider. Now the sequential test talks about drinking establishment on site, but the Local Plan is</p>	<p>Add text in sequential test and Local Plan to say that Exception Test may need to be applied at the planning application stage, depending on the proposals being put forward.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account."</p> <p>Therefore, if there is any change in the use of the proposed development in the application, there may be the need to apply the exception test.</p>	<p>not promoting drink establishment in the local plan; it is already there.</p>	
<p>Norfolk County Council LLFA</p>	<p>HOV5 – Hoveton Town Centre and OUL3 Oulton District Centre and PHRB1 – Lathams etc.</p>	<p>As previously stated, the application of the sequential and exception test relates to proposed future developments. Therefore, if the local plan is proposing to allocate these sites for new development, the local plan will need to state the nature of the proposed development in these locations in order to undertake the assessments required to develop the supporting evidence base.</p>	<p>Again, we are not promoting a certain use at a certain site. We are protecting the area as a town centre and therefore as per national policy, any uses that come forward need to be appropriate for a centre use. And also appropriate to the flood risk for the site which that use is located – none of which are</p>	<p>Add text in sequential test and Local Plan to say that Exception Test may need to be applied at the planning application stage, depending on the proposals being put forward.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
			known or promoted in the policy.	
Norfolk County Council LLFA	OUL2 and THU1has	If it is a historic site with a granted planning application, then we suggest it is worth consulting with a planner on whether this should be kept in the plan rather than consulting the LLFA on this matter.	These sites have permission now which is implemented. They are kept in the local plan in case any plans/proposals for the sites are changed.	See amendments to these policies discussed elsewhere in the table.
Norfolk County Council LLFA	Pubs	As previously stated, the application of the sequential and exception test relates to proposed future developments. Therefore, if the local plan is proposing to allocate these sites for new development, the local plan will need to state the nature of the proposed development in these locations in order to undertake the assessments required to develop the supporting evidence base.	This is a protection policy that sets parameters for any changes. The Local Plan does not promote anything like more covers or extensions for more drinking areas.	Add text in sequential test and Local Plan to say that Exception Test may need to be applied at the planning application stage, depending on the proposals being put forward.
Norfolk County Council LLFA	Main road network	We suggest consulting with a planner on whether this should be in the plan as an allocated site because it is not something	This is policy that seeks protection of these assets and sets parameters.	See amendments to these policies discussed elsewhere in the table

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		that the LLFA has seen included before without a proposed development being defined.		
Norfolk County Council LLFA	Rail halts and mills	As previously stated, the application of the sequential and exception test relates to proposed future developments. Therefore, if the local plan is proposing to allocate these sites for new development, the local plan will need to state the nature of the proposed development in these locations in order to undertake the assessments required to develop the supporting evidence base.	This is policy that seeks protection of these assets and sets parameters.	See amendments to these policies discussed elsewhere in the table
Norfolk County Council LLFA	Throughout and POHOR4: Horning Sailing Club	In section 5, the " <i>brief description</i> " of the proposed development is found to be incomplete in a number of instances as it does not state the use of the site in terms that are consistent with the uses identified in the vulnerability class. For example, POHOR4: Horning Sailing Club the brief description states " <i>sailing club buildings</i> ". It does not state the function of these buildings. This could have a significant impact on the vulnerability class of the buildings. A	See other rows that talk about specific policies.  POHOR4: Horning Sailing Club: This is noted, but in that particular example, the policy is a protective policy and is not promoting any development and the sailing club is there and has been for years. Lots of	POHOR4: Horning Sailing Club: Add text in sequential test and Local Plan to say that Exception Test may need to be applied at the planning application stage, depending on the proposals being put forward.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>boathouse used for the storage of a boats would be water compatible which would be an appropriate use in flood zone 3b. However, a club house used for entertainment and social gathering, with cafe facilities etc would fall into the less vulnerable class and would not be acceptable in flood zone 3b, with no option for the application of the exception test. Therefore, for the description of the use of the development is an important part of the assessment and a better description is required.</p> <p>LLFA asked for clarification: As previously stated, the application of the sequential and exception test relates to proposed future developments. Therefore, if the local plan is proposing to allocate these sites for new development, the local plan will need to state the nature of the proposed development in these locations in order to undertake the assessments required to develop the supporting evidence base.</p>	<p>policies are protecting what is there. They may give general guidance about what a proposal on a site needs to consider, but a lot of our policies are not promoting a type of development.</p>	

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Norfolk County Council LLFA	General comment	Furthermore, there are occasions where it appears that the application of the sequential and exception tests has been applied inconsistently when compared with national policy. Again, this could be due to lack of appropriate information and description in the table in section 5. Further work is required as the information given in the summary table is incomplete and it is not possible to appropriately apply the sequential and exception test with this information and is open to challenge as it stands.	It is presumed these occasions are the specific areas discussed elsewhere in the table.	See previous rows.

The updated/amended Sequential Test was then sent round to the EA and LLFA for final comment in June 2024.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
Environment Agency	Throughout.	We have some concern that the document puts the EA forward as ruling on the determination of considerations over whether staithes, boatyards and backwaters should be viewed as Marinas. It is up to the LPA to decide on the flood risk vulnerability classification of any given development, not the Environment Agency. We therefore	Agree.	Replace with suggested text throughout document.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		request that the sentence “Aware that the EA consider these as effectively marinas so water compatible”, which is used throughout the document, be replaced with “These are considered as effectively marinas so water compatible”. (To confirm, we don’t disagree with the definition of water compatible).		
Environment Agency	POGTY1	POGTY1 – Given that the site is now confirmed as being FZ3, the conclusions text should now say “A sequential test <b>will</b> need to be applied at the application stage as the final land use is not specified in the policy”.	Agree.	Amend conclusion cell as suggested.
Environment Agency	POHOR8	POHOR8 – Not an essential change but still think that (as mentioned previously) stating specifically that the Exception Test doesn’t apply as the policy is for the retention of existing uses would be useful for clarity.	Agree.	Amend wording re Exception Test as suggested.
Environment Agency	POWHI2	POWHI2 – It would be useful for clarity if the conclusions column referred to the requirement to take a sequential approach to development on site.	Agree.	Amend conclusion cell as suggested.
Norfolk County Council LLFA	Section 5	The LLFA points out that in section 5 on residential moorings for the proposed sites to be allocated, the application of the sequential and exception test will need to be	Noted. The residential moorings are in flood zone 3b and the boat on which the person would live is in the waterbody which is	Add some wording about the sequential test to section 5 as follows:

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>completed first. Therefore, it is not possible to say that as the site is allocated it passes part b of the exception test. The LLFA would suggest the rewording of this section that focuses on the provision of evidence that assesses and demonstrates the significance of the flood risk, the mitigation measures necessary to reduce the impact of the flood risk and management measures that will be included to mitigate the residual impacts of flood risk and the associated mitigation. Once this has been undertaken and achieved for each site, then the proposed development could be considered as having a sufficient evidence base for the consideration of whether the allocation of each site is appropriate or not. Without this evidence base, it is not possible to allocate site in accordance with NPPF and NPPG.</p>	<p>flood zone 3b. There is no avoiding that for residential moorings. The Housing and Planning Act 2016 at paragraph 124 sets a requirement to consider the needs for where houseboats can be moored. So we are required by law to meet the need of those living on boats on inland waterways. It is therefore not clear how the allocation of residential moorings, whereby the boat to be lived on and the mooring itself are in 3b, can have the sequential test applied.</p>	<p>The aim of the sequential approach/test is set out in the NPPG which says: ‘The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding’. Residential moorings and the boat that will subsequently be lived on are in flood zone 3b by their very nature. The <a href="#">Housing and Planning Act 2016</a> at Section 124 requires Local Planning Authorities to identify and meet the need of those who live on a boat. So we are required by law to meet the need of those living on boats</p>



Organisation	Section of the draft Sequential Test	Comment	Response	Action
				on inland waterways. It is therefore not clear how the allocation of residential moorings, whereby the boat to be lived on and the mooring itself are in 3b, can have the sequential test applied as if you are living on a boat that is on water then you can't be located in areas of lower risk of flooding.
Norfolk County Council LLFA	Section 6	The LLFA notes there is duplication of text in section 6 which requires amending. In addition, one of the points given in paragraph 079 of the NPPG has not been copied into the document. This is "not impede water flows and not increase flood risk elsewhere". The LLFA requests that an appropriate update is made.	Noted and agree.	Remove duplication and ensure paragraph 079 bullet points are all copied over.
Norfolk County Council LLFA	Section 6	Also in relation to section 6, the LLFA notes the document considers residential accommodation with moorings (POBRU1) and residential moorings (POBRU6, POCHE1, POGIL1) to be water compatible	Noted. This is advice from the EA – see elsewhere in the previous table of comments.	No change to Sequential Test.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		<p>development. The LLFA notes there are two different types of vulnerable development; the moorings which are "water compatible"; and the residential riverside chalets / residential accommodation on the vessels are either "more vulnerable" or "highly vulnerable". The vulnerability classification of the residential accommodation would depend on the type of construction used such as traditional dwelling construction or park home / caravan construction. Therefore, if these proposed developments were in Flood Zone 3 (or 2 depending on which construction type), the exception test would need to be applied before the site could be allocated.</p>	<p>BRU1 clearly says that no new holiday or market residential dwellings will be permitted.</p>	
<p>Norfolk County Council LLFA</p>	<p>Section 8</p>	<p>The LLFA reminds the LPA that the limited description of the proposed development in the Table in section 8 leads to ambiguity of the proposed development. For example, POHOR3 states "Waterside plots including some buildings. General upkeep." in the description. While later in this row in the table the vulnerability class is described as "Chalets (including gardens [1]) – More</p>	<p>POHOR3 does not allocate the site for development or propose development at the site. The policy contains wording about what can happen at the site within parameters such as flood risk, which is quoted as a constraint. A reader can</p>	<p>No change to Sequential Test.</p>

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		vulnerable". Therefore, the proposed development is actually a residential development and not water compatible as indicated in section 6. These inconsistencies need to be addressed as it will undermine the local plan policies and result in the inappropriate and incorrect application of NPPF.	read the policies in detail if they wish, but the table in section 8 clearly identifies this column as being a 'brief description'.	
Norfolk County Council LLFA	POHOR4, POHOR6 and POHOR7,	There are a number of sites, such as POHOR4, POHOR6 and POHOR7, where it is not possible to determine what type of development is proposed there. Therefore, for sites such as the sailing club, only water compatible aspects of the club would be allocated under the current proposal such as those listed in Annex 3. Any other developments such as shops, offices, restaurants and residential facilities would not be considered as allocated in terms of the sequential and exception test and would require further assessment and evidence for these types of development to occur. While for the POHOR7 with the description of "Seeks minimal development" it's not possible to determine what type of	These policies do not allocate the sites for development or propose development at the sites. The policies quoted contain wording about what can happen at the site within parameters such as flood risk, which is quoted as a constraint. A reader can read the policies in detail if they wish, but the table in section 8 clearly identifies this column as being a 'brief description'. Furthermore, in Horning, no residential development can come	No change to Sequential Test.

Organisation	Section of the draft Sequential Test	Comment	Response	Action
		development is proposed at these moorings, therefore, even though the site is identified nothing can be assessed, resulting in no meaningful allocation. The LLFA recommends the LPA reviews and better defines the type of the proposed development.	forward due to capacity constraints at the Water Recycling Centre.	
Norfolk County Council LLFA	Section 6	In section 6 the title refers to a very specific technical phrase "water compatible uses", yet in the second paragraph of the section, there is reference to sites that have a higher vulnerability class as also being considered as water compatible.	Observation noted, although no clear request is included. However, wording could be improved.	Make this change to wording: This applies to relevant uses, classed as water compatible, at these sites: POBRU1, POBRU2, POBRU3, POBRU4, POBRU5, POBRU6, POCHE1, PODIL 1, PODIT1, PODIT2, POGIL1, POHOR3, POHOR4, POHOR5, POHOR6, POHOR7, POHOV1, POLOD1, PONOR2, POORM1 ("depending on precise operation"), POOUL1, POPHRB3, POSOL1, POSOM1, POSTA1, POTSA1, POTSA2 (unless more vulnerable development is proposed), POTSA3, POTSA4, POTSA5, POWHI1 (aside for café and car park), POSSTRI, POSSUT,

Organisation	Section of the draft Sequential Test	Comment	Response	Action
				POSSTRACKS, POSSSTAITHES, POSSCOAST, POSSLGS, PODM9. It should be noted that some uses of these areas may have different vulnerability classes.
Norfolk County Council LLFA	Section 7	In section 7 there are a couple of typos that require addressing.	Noted and these will be addressed.	Ensure check typos.
Norfolk County Council LLFA	General comment	The LLFA has recently updated the developer guidance on the information required by the LLFA from applicants, which can be found at <a href="https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers">https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers</a> .	Noted.	No change to Sequential Test.