

Sequential and Exception Test

**To support the
Portsmouth Pre-Submission Local Plan 2024
and the
Portsmouth Pre-Submission Local Plan
Addendum 2025**

November 2025



Portsmouth
CITY COUNCIL

Contents

1	Introduction	1
2	Background and Evidence	2
3	Portsmouth Local Plan	5
4	Sequential Test.....	6
5	Exception Test.....	27

1 Introduction

- 1.1 The National Planning Policy Framework (NPPF) requires Local Plans to apply a sequential risk-based approach to development to avoid flood risk to people and property where possible.
- 1.2 The NPPF is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. To achieve this, local plans should apply a sequential, risk-based approach to the location of development and the first step in doing so is to apply the sequential test, and then, if necessary, the exception test.
- 1.3 This paper sets out background information about Portsmouth, and the proposed Local Plan allocations, and then applies the sequential test, and where required, the exception test for the sites proposed for allocation within the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 combined. It has been undertaken using the Environment Agency flood maps for planning (2025) and information contained in the Partnership for South Hampshire (PfSH) Level 1 Strategic Flood Risk Assessment (SFRA) Main Report¹, the PfSH Level 1 SFRA Part 5², and the Portsmouth City Council (PCC) Level 2 SFRA³ (2025).
- 1.4 In January 2025 the Environment Agency (EA) published new National Flood Risk Assessment (NaFRA) 'Risk of flooding from rivers and sea' and 'Risk of flooding from surface water'. They also published new National Coastal Erosion Risk Map (NCERM) on this date. In March 2025, the EA published new NaFRA 'flood zone' data on 'flood map for planning'. Within this paper, when assessing current day mapping, the new flood maps published in March 2025 have been used. When referring to future flood zones, the maps published as part of the PfSH SFRA Levels 1 and 2 have been used. This approach was agreed with the Environment Agency in April 2025 and will be formally confirmed in a forthcoming Statement of Common Ground.

¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-1-Main-Report-V6.pdf>

² <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-5-Portsmouth-CC-Final-V3.pdf>

³ https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/PCC-Level-2-SFRA_Version-5-18-Nov-25.pdf and https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Level-2-App-A_Figure1_Undef-MaxFloodHazard_UE_1in200_2122.pdf

2 Background and Evidence

2.1 Geography of Portsmouth

- 2.1.1 Portsmouth is the UK's only island City. Whilst this brings an array of benefits with its historic waterfront and popular beach, it does mean that the City is significantly constrained, especially when it comes to growth.
- 2.1.2 Portsmouth has a shoreline with a total length of 44 km. The City Council is directly responsible for 23 km of Portsmouth's coastline with the remainder in private ownership, predominantly owned by the Ministry of Defence. The open coast (8 km) is the southern and most exposed shoreline of Portsea Island. Portsmouth is also significantly low lying with the majority of Portsea Island being less than 10m above sea level.
- 2.1.3 Portsmouth is a City that is exposed to significant degrees of flood risk with large areas of the south of the island and to the north, including the mainland, falling within flood zones 2 and 3 (areas most at risk of extreme flood events). This flood risk is expected to grow with the accompanying sea level rise brought about by future projected climate change.
- 2.1.4 The City is compact and there are very few vacant sites or opportunity areas within the administrative boundary that could deliver significant levels of growth to meet housing need, meaning that Portsmouth is unable to meet its housing need as calculated by the standard method.

2.2 Sources of Flooding

- 2.2.1 Areas at risk of flooding can be at risk from any source, now or in the future. Sources include: rivers and the sea; direct rainfall on the ground surface; rising groundwater; overwhelmed sewers and drainage systems; reservoirs, canals and lakes and other artificial sources. Table 1 below defines the Environment Agency (EA) flood zones.

Table 1: Flood Zones (Source: PPG Paragraph: 078 Reference ID:7-078-20220825)

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
Zone 2 Medium Probability	Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. (Land shown in dark blue on the Flood Map)

Zone 3b The Functional Floodplain	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise: • land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or • land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding). Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)
-----------------------------------	--

Note: The Flood Zones shown on the Environment Agency's Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding.

2.2.2 The Functional Floodplain is defined in the NPPF as 'land where water from rivers or the sea has to flow or be stored in times of flood'. The Functional Floodplain (also referred to as Flood Zone 3b), is not separately distinguished from Flood Zone 3a on the Flood Map for Planning. Rather, the SFRA is the place where LPAs should identify areas of Functional Floodplain in discussion with the Environment Agency.

2.3 Strategic Flood Risk Assessment

2.3.1 Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA). An SFRA is a study carried out to assess the risk to an area from all sources of flooding, now and in the future. It takes into account the impacts of climate change, as well as assessing the cumulative impact that land use changes and development in the area will have on the flood risk. It identifies opportunities to reduce the causes and impacts of flooding and gathers information on the land that is likely to be needed for flood risk management infrastructure. It also informs policies for reducing the causes and impacts of flooding. In addition, it provides guidance on how the sequential and exception tests should be applied.

2.3.2 AECOM were commissioned by PCC in 2023 on behalf of ten planning authorities in South Hampshire (the 'Partnership for South Hampshire' (PfSH)) to prepare an updated SFRA. The PfSH SFRA covers the administrative areas of: Portsmouth City, Havant Borough, Gosport Borough, Fareham Borough, Eastleigh Borough, Southampton City, Winchester City, Test Valley Borough, New Forest District and New Forest National Park Authority.

2.3.3 A Portsmouth-specific Level 2 SFRA has also been prepared to support the application of the exception test. It contains site specific summaries of actual risk and recommendations for those sites proposed for allocation for development that are identified to be at risk of flooding. The SFRA Level 2 was originally published in April 2024 to support the Portsmouth Pre-Submission Local Plan 2024, but was subsequently updated in November 2025 to reflect changes made to allocations in the Portsmouth Pre-Submission Local Plan Addendum 2025. The November 2025 SFRA Level 2 findings have been fully integrated into the original April 2024 SFRA Level 2 document.

- 2.3.4 The PPG states that the identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. With this caveat as a starting point, the functional floodplain will normally comprise land having a 3.3% Annual Exceedance Probability (AEP) or greater annual probability of flooding (1 in 30 year), with existing flood risk management infrastructure operating effectively.
- 2.3.5 Portsmouth is largely protected from flooding from the sea during the 3.3% AEP event by the presence of flood defences (including, those being developed as part of the Southsea Coastal Scheme and the North Portsea Island Scheme). Modelling of the 3.3% AEP event has been undertaken as part of the SFRA to identify areas at more frequent risk of flooding from the sea. These areas include:
- The northern part of Trafalgar Wharf;
 - The northern part of Portsea Island, along Hilsea Moat and a small area to the east close to Buckby Lane. Flood defence improvement works are planned for Ports Creek which are due for completion in 2026. Once these are in place, the north of Portsea Island will be protected during the 3.3% AEP event;
 - Part of Portsmouth Point, Old Portsmouth;
 - The northern coastline of Eastney Lake, adjacent to the Eastney and Milton Allotments and Milton Nature Reserve.
- 2.3.6 Land within Portsmouth is not needed to store tidal flood water given the proximity of the wider Solent. Therefore, a review of these areas has been undertaken in the light of these local circumstances and in agreement with the Environment Agency the areas that have a 3.3% AEP or greater annual probability of flooding (1 in 30 year) are included within the flood zone 3a definition and no flood zone 3b associated with the sea has been defined. There is, therefore, no land within flood zone 3b in Portsmouth.
- 2.3.7 Climate change is expected to increase the frequency, extent, and impact of flooding in coastal areas, because of sea level rise. Coastal modelling scenarios within the SFRA Levels 1 and 2 have been undertaken to show predicted future changes in flood extent within the study area. This modelling has been undertaken for the years 2055 and 2122 in accordance with the Environment Agency's guidance on the application of climate change allowances⁴.

⁴ <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#sea-level-allowances>

3 Portsmouth Local Plan

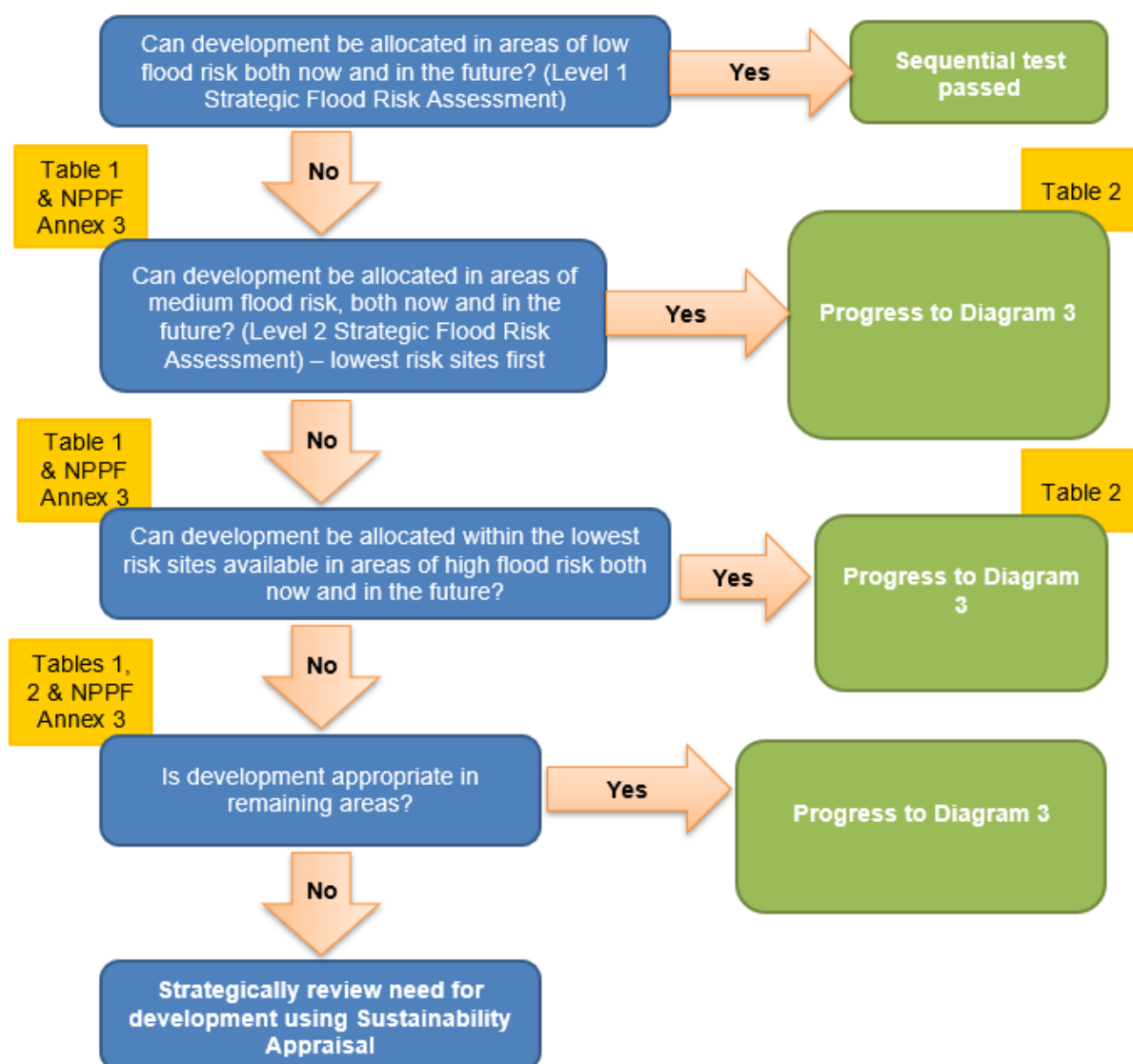
- 3.1 The Portsmouth Local Plan will be the key planning document for the City of Portsmouth once adopted. Together, the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 set out policies and guidance to shape the built environment, plan and manage growth and guide development across the City over a 15-year period. They seek to achieve the right balance between planning positively to meet the City's development needs, particularly for jobs, homes and community facilities with the continuing need to protect these from flooding along with other important cultural, historical and environmental assets around the City.
- 3.2 The Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 combined propose the allocation of a total of 13 sites, with seven of these classified as 'strategic sites'. The seven strategic sites are:
- Tipner West;
 - Tipner East;
 - Lakeside North Harbour;
 - Portsmouth City Centre;
 - Fratton Park & the Pompey Centre;
 - St James' & Langstone Campus;
 - Horsea Island Strategic Open Space.
- 3.3 The remaining six site allocations consist of:
- Land West of Portsdown Technology Park;
 - Port Solent;
 - St John's College;
 - Fraser Range;
 - The News Centre;
 - Somers Orchard.
- 3.4 Flood risk at all strategic sites and site allocations has been assessed as part of this study, and the sequential test has been applied to all allocations, and where required the exception test has also been applied.
- 3.5 The Portsmouth Pre-Submission Local Plan Addendum 2025 also provides a list of deliverable and developable sites from the HELAA (excluding strategic sites and site allocations) within Appendix 2. These sites are considered in the context of applying the sequential test to the strategic sites and site allocations.

4 Sequential Test

4.1 Introduction

- 4.1.1 The chief policy document regarding development and flood risk is the NPPF, specifically paragraphs 170 to 182 with further guidance provided within Planning Practice Guidance (PPG) on Flood Risk and Coastal Change.
- 4.1.2 Paragraph 174 of the NPPF states: *'...the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.'*
- 4.1.3 The EA flood maps for planning (2025) show the current extent of flood zones 2 and 3 in the City. The Council's SFRA Level 1 details the extent of the flood risk from all sources in Portsmouth, taking into account the effects of climate change, and provides an overview of historic flooding.
- 4.1.4 The sequential test is therefore, based upon the data provided by the EA flood maps for planning (2025) and the Level 1 SFRA completed by AECOM in February 2024. The PPG provides detail on how to apply the sequential test for local plan preparation, as shown in Figure 1 below.

Figure 1: Application of the sequential test for plan preparation (Source: PPG, Diagram 2, Paragraph: 026 Reference ID: 7-026-20220825)



- 4.1.5 Government guidance does not intend to prevent all development on sites liable to flooding, accepting that some form of development may have to take place there. The focus is instead on minimising risks to people and property. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 4.1.6 The guidance sets out that the overall aim of decision-makers should be to steer new development to flood zone 1. Where there are no reasonably available sites in flood zone 1, decision-makers should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood zone 2, applying the exception test if required. Only where there are no reasonably available sites in flood zones 1 or 2 should decision-makers consider the suitability of sites in flood zone 3, taking into account the flood risk vulnerability of land uses and applying the exception test if required.

4.1.7 Table 2 below provides details on the types of development that fall within each vulnerability classification.

Table 2: Flood risk vulnerability classification (Source: NPPF Annex 3)

ESSENTIAL INFRASTRUCTURE
• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood. • Wind turbines. • Solar farms
HIGHLY VULNERABLE
• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)
MORE VULNERABLE
• Hospitals • Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non-residential uses for health services, nurseries and educational establishments. • Landfill* and sites used for waste management facilities for hazardous waste. • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.
LESS VULNERABLE
• Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure. • Land and buildings used for agriculture and forestry. • Waste treatment (except landfill* and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place. • Car parks.
WATER-COMPATIBLE DEVELOPMENT
• Flood control infrastructure. • Water transmission infrastructure and pumping stations. • Sewage transmission infrastructure and pumping stations. • Sand and gravel working.

- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

4.1.8 Figure 2 below explains when the exception test needs to be applied based on the vulnerability of the development coming forward and the flood risk level of the site.

Figure 2: Compatibility of flood zones with a land use's vulnerability classification
(Source: PPG Paragraph: 079 Reference ID: 7-079-2022085 Revision date: 25 08 2022)

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *
Key:					
✓ Exception test is not required					
X Development should not be permitted					

4.2 Local Plan Strategic Sites and Site Allocations

- 4.2.1 Given the constrained nature of Portsmouth, the City does not have a large pool of alternative sites to take through a selection process to allocate land as demonstrated in the Housing and Economic Land Availability Assessment (HELAA). This means that many sites were unable to pass the sequential test. The following sections show how flood risk has been taken into consideration and why it is not possible in Portsmouth to omit any sites based on the sequential test alone.
- 4.2.2 The latest version of the HELAA⁵ is dated October 2025. The HELAA is an assessment of land availability that identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The identification of these sites followed several calls for sites, inviting interested parties (including landowners and developers) to propose sites which have potential for future development. The HELAA identifies sites that have the potential for housing and employment development, assesses how many units they could accommodate, and suggests a timeframe for when these sites could become available.
- 4.2.3 The HELAA takes the form of a written report⁶ with information on each of the sites identified to have development potential. Site information assessed includes flood risk categorisation based on the EA flood maps, the 2025 HELAA includes constraints maps for all sites considered at stage 2 of the HELAA which show the current extent of flooding as per the EA flood maps (2025). Given the extremely limited number of deliverable and developable sites in the City, sites in all flood zones have been included for assessment in the HELAA. The HELAA 2025 Methodology⁷ proposes discounting sites at stage 1 if they are entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability) but none of the sites assessed were entirely within such areas, so no sites were rejected on that basis. The assessment of potential sites takes into account flood risk by reference to the flood zones, which was one factor of many in determining the ultimate deliverability of sites.
- 4.2.4 The seven Local Plan strategic sites are proposed for allocation as they are mission critical to achieving the Imagine Portsmouth 2040 vision. Some of these are carried forward from the 2012 Portsmouth Plan, as they have not yet been developed. These are the only sites within Portsmouth capable of delivering a significant quantum of development, including much needed housing and employment opportunities and other development to benefit the City. Whilst their cumulative total would be capable of delivering circa 6,379 homes, this would not meet housing need arising in the City in full as defined by the standard method. The few large areas of open space within Portsmouth (such as Southsea Common and recreation grounds) are protected from development due to the importance they play in delivering much needed open space and environmental benefits to the City; there is an under supply of open space in the

⁵ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/housing-and-economic-land-availability-assessment/>

⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/HELAA-2025.pdf>

⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/01-PCC_Housing-and-Economic-Land-Availability-Assessment_Methodology-v3.pdf

City. These have therefore, not been considered appropriate for development and therefore, have not been considered as part of the sequential and exception test.

- 4.2.5 In addition to the seven strategic sites, six further site allocations are proposed for allocation within the Portsmouth Local Plan. These would be capable of delivering a further circa 1,512 homes, which still would not meet the housing need arising in the City in full as defined by the standard method.
- 4.2.6 When selecting sites for allocation, the Council considered sites which passed the sequential test first. Table 3 below shows how flood risk has been assessed at each of the strategic sites and site allocations to understand which ones do and do not need to progress to the exception test.
- 4.2.7 The potential strategic sites and site allocations were screened against flood risk information to determine the proportion of each site at risk in flood zones 2 and 3a both currently (based on 2025 EA flood maps for planning) and in the future (based on the SFRA maps including assumptions for climate change for 2122).
- 4.2.8 This data was then cross checked with the vulnerability of the proposed uses of the sites. The flood risk vulnerability classification that is required for the sequential test is outlined in Table 2 of this report. The results of the sequential test are presented in Table 3 below. The search area used for the sequential test was the whole of the administrative area of Portsmouth, and reasonable available sites were considered to be all sites classed as available in the 2025 Housing and Economic Land Availability Assessment.

Table 2: Sequential assessment of strategic sites and site allocations in the Portsmouth Pre-Submission Local Plan 2024 and Portsmouth Pre-Submission Local Plan Addendum 2025 combined

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
Strategic Sites										
Tipner West	FZ2	7.56%	FZ2	79.50%	The hazard rating is Significant across most of the site with a small area of Low in the south and western edge of Tipner West. The maximum flood hazard reaches Extreme in parts of the northern tip of the site.	Previously Developed Land (part greenfield)	1,000 residential units - More Vulnerable	There are no alternative sites that could accommodate this level of development.	Development is considered appropriate following the application of the exception test. A Flood Risk Assessment will need to be submitted with any planning application to ensure development is safe for its lifetime.	Yes
	FZ3a	16.72%	FZ3a	77.99%			25,000 sqm class E(g), research and development, light industrial, B2 general industrial and B8 storage or distribution, including ancillary office space use - Less Vulnerable			
Tipner East	FZ2	9.29%	FZ2	91.78%	The hazard rating is Significant across over 50% of the site, with the southeast corner being Low and the western side being moderate.	Previously Developed Land (former dog track amongst other previous uses)	1,056 residential units - More Vulnerable	There are no alternative sites that could accommodate this level of development.	Development is considered appropriate following the application of the exception test. A Flood Risk Assessment will need to be submitted with any planning	Yes
	FZ3a	8.63%	FZ3a	91.05%			Transport hub - Less Vulnerable			

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
									application to ensure development is safe for its lifetime.	
Lakeside North Harbour	FZ2	0%	FZ2	92.59%	The hazard rating is Low (Caution) within the eastern portion of the site and significant along the southern boundary	Previously Developed Land (office complex/car park)	50,000 sqm office floorspace - Less Vulnerable	There are no alternative sites that could accommodate this level of employment development.	Lakeside is currently not located within flood zones 2 or 3, although the majority of the site is expected to be within flood zones 2 and 3a by 2122. The site is allocated for less vulnerable office use and therefore the exception test does not need to be applied. A Flood Risk Assessment will need to be submitted with any planning application to ensure development is safe for its lifetime.	No
	FZ3a	0%	FZ3a	66.36%						

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
Portsmouth City Centre	FZ2	0%	FZ2	15.26%	The hazard rating is Low to Moderate in the Victoria Park area. The remainder of the site is not at risk of flooding during this scenario, as the ground levels are higher.	Previously Developed Land (retail/employment/car park)	3,458 residential units - More Vulnerable 21,600 sqm office floorspace - Less Vulnerable	There is the potential for a sequential approach to be taken within the site itself, directing development away from the areas within the southwest that are at risk of flooding (in an undefended scenario) in 2122. There are no alternative sites wholly within Flood Zone 1 that could accommodate this level of development.	The site is expected to be partially located within flood zones 2 and 3a by 2122. Due to the risk of flooding within Portsmouth, application of the exception test would be appropriate in the circumstance that part of the development could only be delivered within areas at risk of flooding. A Flood Risk Assessment will need to be submitted with any planning application to ensure development is safe for its lifetime.	Yes
	FZ3a	0%	FZ3a	5.38%						
Fratton Park & the	FZ2	0%	FZ2	0%	N/A	Previously Developed	460 residential units - More Vulnerable	The site is entirely within	Development is appropriate in	No

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
Pompey Centre	FZ3a	0%	FZ3a	0%		Land (retail / light industrial / car park / football stadium)	Hotel - More Vulnerable Expanded stadium - Less Vulnerable Mixed conference, event and retail units - Less Vulnerable	Flood Zone 1. Development can be located within an area at lowest risk of flooding both now and in the future	this location and the exception test does not need to be applied.	
St James' & Langstone Campus	FZ2	0.04%	FZ2	30.00%	Hazard rating ranges from Low to Significant on the eastern boundary of the site.	Previously Developed Land (former hospital and former university campus)	405 residential units - More Vulnerable Healthcare facilities - More Vulnerable	There is the potential for a sequential approach to be taken within the site itself, directing development away from the areas along the eastern coastline that are at risk of flooding currently and (in an undefended scenario) in 2122. There are no alternative	Due to the risk of flooding within Portsmouth, the application of the exception test would be appropriate in the circumstance that part of the development could only be delivered within areas at risk of flooding. A Flood Risk Assessment will need to be submitted with any planning application to ensure	Yes
	FZ3a	0 %	FZ3a	18.47%						

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
								sites wholly within Flood Zone 1 that could accommodate this level of development.	development is safe for its lifetime.	
Horsea Island Strategic Open Space	FZ2	0.26%	FZ2	6.34%	N/A	Not Previously Developed Land (Former landfill)	Open Space - Water compatible development	This site will deliver an area of open space with no proposed built development, it is water compatible development.	Open space is considered appropriate at this location.	No
	FZ3a	1.89%	FZ3a	5.91%						
Site Allocations										
Land West of Portsdown Technology Park	FZ2	0%	FZ2	0%	N/A	Previously Developed Land (former Ministry of Defence buildings)	12,500 sqm research and development floorspace and B2/B8manufacturing - Less Vulnerable	The site is entirely within Flood Zone 1. Development can be located within an area at lowest risk of flooding both now and in the future	Development is appropriate at this location and the exception test does not need to be applied.	No
	FZ3a	0%	FZ3a	0%						
Port Solent	FZ2	0.23%	FZ2	37.43%	The hazard rating is Low	Previously Developed	500 residential units - More Vulnerable	There is the potential for a sequential	Due to the risk of flooding within Portsmouth, the	Yes
	FZ3a	0.66%	FZ3a	34.71%						

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
					to Significant on the area to the north. The remainder of the site is not at risk of flooding during this scenario.	Land (commercial)		approach to be taken within the site itself, directing development away from the area along the northern boundary that is at risk of flooding. There are no alternative sites wholly within Flood Zone 1 that could accommodate this level of development.	application of the exception test would be appropriate to ensure a robust assessment of the site's appropriateness. A Flood Risk Assessment will need to be submitted with any planning application to ensure development is safe for its lifetime	
St John's College	FZ2	0%	FZ2	69.94%	The hazard rating is Low to Moderate on the southern edge of the site and the immediate access routes along Grove Road South, Elm Grove, and Victoria Road North	Previously Developed Land (former school)	215 residential units - More Vulnerable	There are no alternative sites that have not already been allocated or identified that could accommodate this level of development.	Upon completion of the Southsea Coastal Scheme, flood risk at the site will be reduced to an acceptable level. Application of the exception test would be required in the	Yes
	FZ3a	0%	FZ3a	53.73%						

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
									event that residential development comes forward prior to completion of the flood defence scheme or in the event that the defence fails. A Flood Risk Assessment will need to be submitted with any planning application to ensure development is safe for its lifetime.	
Fraser Range	FZ2	2.22%	FZ2	72.22%	The hazard rating is on the site is Low to Significant across the central and eastern portion. The southern boundary of the site is Extreme.	Previously Developed Land (derelict former gunnery and research site)	134 residential units - More Vulnerable	There are no alternative sites that have not already been allocated or identified that could accommodate this level of development.	Development is considered appropriate following the application of the exception test. A Flood Risk Assessment will need to be submitted with any planning	Yes
	FZ3a	46.59%	FZ3a	71.23%						

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
									application to ensure development is safe for its lifetime.	
The News Centre	FZ2	47.50%	FZ2	100%	The hazard rating is Significant to Extreme on the site and local access routes	Previously Developed Land (former printing/press office)	Electric bus depot - Less Vulnerable 100 residential units - More Vulnerable	There are no alternative sites that have not already been allocated or identified that could accommodate this level of development.	Upon completion of the North Portsea Island scheme, flood risk at the site will be reduced to an acceptable level. Application of the exception test would be required in the event that residential development comes forward prior to completion of the flood defence scheme or in the event that the defence fails. A Flood Risk Assessment will need to be submitted with any planning	Yes
	FZ3a	52.50%	FZ3a	100%						

Site	% of site in Flood Zones 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Flood Hazard rating (Undefended 0.5% AEP 2122 (Upper End)	Previously Developed Land/Not previously developed	Proposed Development Use and flood risk vulnerability	Could development be located within a lower risk zone?	Acceptability of development	Exception test required?
									application to ensure development is safe for its lifetime.	
Somers Orchard	FZ2	0%	FZ2	0%	N/A	Previously Developed Land (former residential tower blocks)	566 residential units - More Vulnerable	The site is entirely within Flood Zone 1. Development can be located within an area at lowest risk of flooding both now and in the future.	Development is appropriate in this location and the application of the exception test is not required.	No
	FZ3a	0%	FZ3a	0%						

- 4.2.9 Out of the 13 sites sequentially tested within Table 3 above, six are currently wholly within flood zone 1. Three of these sites (Fratton Park & the Pompey Centre, Land West of Portsdown Technology Park, and Somers Orchard) are predicted to remain in flood zone 1 in 2122 and therefore, are deemed suitable for all development including residential, commercial and/or industrial. They pass the sequential test and do not need to be carried forward for the exception test.
- 4.2.10 Of the ten remaining sites, all are affected by one or more of flood zones 2 or 3a either now, or in the future. Lakeside North Harbour is proposed for office development and therefore, whilst it is located within flood zones 2 and 3a in the future, the land use is less vulnerable and the exception test will not be required (in accordance with Figure 2). Horsea Island Strategic Open Space will deliver a new area of open space, which is classified as water compatible development, so there is also no need to apply the exception test to this site.
- 4.2.11 Eight sites (Tipner West, Tipner East, Portsmouth City Centre, St James' & Langstone Campus, St John's College, Port Solent, The News Centre, and Fraser Range) are deemed to require the exception test. Section 5 of this report provides further detail on the application of the exception test to these sites.

4.3 Other Identified Sites

- 4.3.1 The HELAA includes an assessment of other sites across Portsmouth which are identified within the Local Plan as part of Portsmouth's housing supply. These are defined as 'deliverable' and 'developable' sites identified within Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025 and are listed below within Tables 4 and 5.
- 4.3.2 Given the extent of flood risk within Portsmouth, a further assessment of flood risk has been undertaken on these 'identified sites'. This exercise was undertaken to understand if any of the larger sites within Table 3 could be omitted from the Local Plan, and replaced with a number of smaller sites (within areas at lower risk of flooding) which could deliver the same quantum of development in an area at lower risk of flooding.

Table 3: Flood risk information on Deliverable Sites from the HELAA 2025 identified in Appendix 2 of the Pre-Submission Local Plan Addendum 2025

HELAA Site ref.	Site name	% of site in Flood Zone 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Previously Developed Land/Non previously developed land	Total net dwellings
		FZ2	0%	FZ2	43%		
COP01	Brynwell Builder's Yard, 207-217 Copnor Road	FZ3a	0%	FZ3a	9%	Previously Developed Land (builder's yard)	25
COS01	Cosham Health Centre, Vectis Way	FZ2	0%	FZ2	88%	Previously Developed Land (former health centre)	70
		FZ3a	0%	FZ3a	10%		

CS06	227-231 Goldsmith Avenue	FZ2	0%	FZ2	0%	Previously Developed Land (commercial and industrial)	25
		FZ3a	0%	FZ3a	0%		
EC14	Eastney Swimming Pool and part of Southsea Leisure Park	FZ2	6%	FZ2	83%	Previously Developed Land (leisure facilities)	6
		FZ3a	80%	FZ3a	82%		
FR06	St Wilfrids Church, 49 George Street	FZ2	0%	FZ2	0%	Previously Developed Land (former church)	8
		FZ3a	0%	FZ3a	0%		
MI07	185-191 Highland Road	FZ2	0%	FZ2	0%	Previously Developed Land (vacant land)	8
		FZ3a	0%	FZ3a	0%		
ST03	Open space at Stone Street	FZ2	0%	FZ2	100%	Previously Developed Land (vacant land)	18
		FZ3a	0%	FZ3a	81%		

Table 4: Flood risk information on Developable Sites from the HELAA 2025 identified in Appendix 2 of the Pre-Submission Local Plan Addendum 2025

HELAA Site ref.	Site name	% of site in Flood Zone 2 and 3a (2025)		% of site in Flood Zone 2 and 3a (2122)		Previously Developed Land/Non previously developed land	Total net dwellings
BA01	Coniston Avenue	FZ2	0%	FZ2	0%	Previously Developed Land (builder's yard)	11
		FZ3a	0%	FZ3a	0%		
BA02	West of Milton Road	FZ2	0%	FZ2	41%	Previously Developed Land (auto repair workshops)	8
		FZ3a	0%	FZ3a	6%		
CD01	Wardroom	FZ2	0%	FZ2	99%	Previously Developed Land (naval building)	200
		FZ3a	0%	FZ3a	73%		
CD04	The Invincible, Wickham Street	FZ2	0%	FZ2	1%	Previously Developed Land (former public house)	40 (C3 equivalent, a ratio of 1.9 has been applied due to proposals being for HMO accommodation)
		FZ3a	0%	FZ3a	0%		
CD07	Bridge Centre, Fratton	FZ2	0%	FZ2	0%	Previously Developed Land (shopping centre)	115
		FZ3a	0%	FZ3a	0%		
CD10	Maxstoke Close Car Park	FZ2	0%	FZ2	0%	Previously Developed	5
		FZ3a	0%	FZ3a	0%		

						Land (car park)	
CD15	Hertford Place	FZ2	0%	FZ2	0%	Previously Developed Land (garages)	17
		FZ3a	0%	FZ3a	0%		
CD35	42 Kent Street, Groundlings Theatre	FZ2	0%	FZ2	21%	Previously Developed Land (theatre and car park)	20
		FZ3a	0%	FZ3a	13%		
CD65	117-127 Fratton Road	FZ2	0%	FZ2	0%	Previously Developed Land (vacant leisure, commercial and retail building)	30
		FZ3a	0%	FZ3a	0%		
CD75	Venture Tower Fratton Road	FZ2	0%	FZ2	0%	Previously Developed Land (tower block)	41 (C3 equivalent, A ratio of 2.4 has been applied due to proposals being for student accommodation)
		FZ3a	0%	FZ3a	0%		
COS03	Westmoors 50 London Road Cosham	FZ2	0%	FZ2	0%	Previously Developed Land (residential)	10
		FZ3a	0%	FZ3a	0%		
COS04	Former Cosham Police Station	FZ2	0%	FZ2	1%	Previously Developed Land (former police station)	60
		FZ3a	0%	FZ3a	0%		
COS05	Clock House, Spur Road	FZ2	0%	FZ2	0%	Previously Developed Land (barber's shop)	18 (C3 equivalent, A ratio of 2.4 has been applied due to proposals being for student accommodation)
		FZ3a	0%	FZ3a	0%		
DF02	Karen Avenue	FZ2	0%	FZ2	100%	Previously Developed Land (vacant land)	6
		FZ3a	0%	FZ3a	100%		
EC02B	Land at Halliday Crescent	FZ2	0%	FZ2	9%	Previously Developed Land (garages)	5
		FZ3a	0%	FZ3a	8%		
EC11	Southsea Marina	FZ2	4.66%	FZ2	32%	Previously Developed Land (marina and associated amenities)	12
		FZ3a	84.62%	FZ3a	32%		
HI01	Hilsea Lodge (Highgrove)	FZ2	0%	FZ2	100%	Previously Developed	34
		FZ3a	0%	FZ3a	94%		

						Land (former care home)	
HI02	Land of former supermarket, Stubbington Avenue	FZ2	0%	FZ2	0%	Previously Developed Land (vacant building)	20
		FZ3a	0%	FZ3a	0%		
HI04	Land at Pompey Health and Fitness	FZ2	0.61%	FZ2	100%	Previously Developed Land (health club/football club training ground) and Not Previously Developed	10
		FZ3a	0%	FZ3a	100%		
HI13	Territorial Army Centre, Peronne Road	FZ2	0.90%	FZ2	100%	Previously Developed Land (army centre)	28
		FZ3a	99.10%	FZ3a	100%		
MI05	Goldsmith Avenue	FZ2	0%	FZ2	0%	Previously Developed Land (industrial and commercial buildings)	20
		FZ3a	0%	FZ3a	0%		
NE01	Connect Centre	FZ2	0%	FZ2	0%	Previously Developed Land (former office building)	191
		FZ3a	0%	FZ3a	0%		
NE03	Former Police Station, Kingston Crescent	FZ2	0%	FZ2	0%	Previously Developed Land (former police station)	60
		FZ3a	0%	FZ3a	0%		
NE05	205 London Road	FZ2	0%	FZ2	0%	Previously Developed Land (residential)	5
		FZ3a	0%	FZ3a	0%		
NE06	Blue Anchor PH, 2 London Road	FZ2	0%	FZ2	0%	Previously Developed Land (commercial)	6
		FZ3a	0%	FZ3a	0%		
NE09	98 London Road	FZ2	0%	FZ2	0%	Previously Developed Land (commercial)	30
		FZ3a	0%	FZ3a	0%		
NE22	Land at Heathfield Road	FZ2	0%	FZ2	0%	Previously Developed Land (car repair garage)	18
		FZ3a	0%	FZ3a	0%		
PA03	140 Southampton Road	FZ2	67.66%	FZ2	100%	Previously Developed Land (vacant plot)	20
		FZ3a	3.03%	FZ3a	100%		
PA16	Amenity Land off Newbolt Road and Bodmin Road	FZ2	0%	FZ2	0%	Not-Previously Developed	8
		FZ3a	0%	FZ3a	0%		
SJ04	61-63 Marmion Road	FZ2	1.99%	FZ2	100%	Previously Developed Land (commercial)	5
		FZ3a	0%	FZ3a	100%		

						and residential)	
SJ12	82-88 Clarendon Road	FZ2	42.86%	FZ2	100%	Previously Developed Land (commercial)	20
		FZ3a	57.13%	FZ3a	100%		
SJ16	Wimbledon Park Sports Centre	FZ2	27.63%	FZ2	100%	Previously Developed Land (sports centre)	30
		FZ3a	71.72%	FZ3a	100%		
SJ17	Queen's Hotel and Grosvenor Casino	FZ2	0%	FZ2	100%	Previously Developed Land (hotel and former casino)	104
		FZ3a	0%	FZ3a	100%		
ST01	City Records Office	FZ2	0%	FZ2	100%	Previously Developed Land (city records office)	45
		FZ3a	0%	FZ3a	95%		
ST02	Middle Street	FZ2	0%	FZ2	0%	Previously Developed Land (offices and commercial)	163
		FZ3a	0%	FZ3a	0%		
ST04	Wightlink Car Park	FZ2	0%	FZ2	100%	Previously Developed Land (car park)	60
		FZ3a	0%	FZ3a	100%		
ST07	Derelict Land, Warwick Crescent	FZ2	0%	FZ2	0%	Previously Developed Land (vacant land)	14 (C3 equivalent, A ratio of 2.4 has been applied due to proposals being for student accommodation)
		FZ3a	0%	FZ3a	0%		
ST12	Cathedral House	FZ2	2.70%	FZ2	100%	Previously Developed Land (mixed use building)	8
		FZ3a	96.15%	FZ3a	100%		
ST13	62 Middle Street	FZ2	0%	FZ2	0%	Previously Developed Land (former office building)	8 (C3 equivalent, A ratio of 2.4 has been applied due to proposals being for student accommodation)
		FZ3a	0%	FZ3a	0%		
ST17	Clarence Pier	FZ2	4.11%	FZ2	100%	Previously Developed Land (pier and associated leisure facilities)	200
		FZ3a	46.95%	FZ3a	100%		

4.3.3 Identified sites contribute to approximately 1,865 homes (1,585 homes with the non-implementation rate applied) across the plan period and there are no sites omitted solely on the grounds of flood risk. When this figure is combined with the number of

homes capable of being delivered at strategic sites and site allocations, deliverable sites with planning permission, and the windfall allowance, this still does not meet Portsmouth's housing need in full based on the standard method. Therefore, identified sites do not provide an adequate level of supply to be delivered as alternatives to strategic sites and site allocations.

- 4.3.4 Inclusion of identified sites (and strategic sites and site allocations) in the Local Plan in all flood zones is needed to enable a level of housing supply which still falls short of meeting Portsmouth's housing need as defined by the standard method. It is therefore, considered that all potential identified deliverable and developable sites (within Tables 4 and 5) will also need to be developed (along with strategic sites and site allocations) and none should be discounted, to deliver as many new homes in Portsmouth as possible.
- 4.3.5 Given the lack of alternative sites for allocation, ranking has not been applied to the sites considered for the sequential test as all sites are needed for either allocation or identification as deliverable or developable.
- 4.3.6 For individual windfall sites not allocated or identified through the Local Plan, these will be required to apply the sequential test, and where necessary the exception test at the planning application stage. This should consider the extent of areas within flood zones 2 and 3a and other sources of flooding.
- 4.3.7 Following the application of the sequential test, Paragraph 177 of the NPPF states: *'Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.'*
- 4.3.8 If the sequential test is not passed, either the exception test is required, or development is considered inappropriate. If the Council cannot meet its development needs from sites that pass the sequential test, for example due to wider sustainability issues, then sites which do not pass the sequential test can be considered for the exception test. Table 3 shows which of the strategic sites and site allocations require the application of the exception test. The exception test is considered in the next section of this report.

5 Exception Test

5.1 Introduction

5.1.1 The Exception Test, as set out in the PPG (Paragraph: 031 Reference ID: 7-031-20220825, Revision date: 25 08 2022) requires two additional elements to be satisfied before development can be allocated or permitted in situations where suitable sites at lower risk of flooding are not available following application of the sequential test. The PPG states:

'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 vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.'*

5.1.2 All strategic sites and site allocations other than Horsea Island Strategic Open Space (which is proposed for a water compatible use) were assessed as part of an SFRA Level 2, due to the significant risk that flooding poses within Portsmouth. This helped provide a robust assessment of flood risk at strategic sites and site allocations, including tidal and surface water flooding. The SFRA Level 2 helped to inform and apply the exception test to the eight sites which were identified as requiring the exception test following the sequential analysis within Table 3. As noted earlier in section 4, the exception test did not need to be applied to the three sites which are currently in flood zone 1 and will remain in flood zone 1 in 2122 (Fratton Park & the Pompey Centre, Land West of Portsdown Technology Park, and Somers Orchard), nor was it necessary to apply the exception test to Lakeside North Harbour due to the proposals being for a use classified as 'less vulnerable'. Horsea Island Strategic Open Space also did not require the application of the exception test due to being proposed for water compatible use.

5.1.3 The following sites required the application of the exception test:

- Tipner West;
- Tipner East;
- Portsmouth City Centre;
- St James' & Langstone Campus;
- Port Solent;
- St John's College;
- Fraser Range;
- The News Centre.

5.1.4 The following two sections of this chapter look at each of the two elements of the exception test in turn.

5.2 Exception Test: wider sustainability benefits

- 5.2.1 The first element of the exception test requires development to provide wider sustainability benefits to the community that outweigh the flood risk. To apply this part of the test, in line with Figure 1, the Council has strategically reviewed the need for development using the Sustainability Appraisal (SA). The SA, published alongside the Local Plan, identifies, describes and evaluates the likely significant effects of implementing the Local Plan, and considers reasonable alternatives.
- 5.2.2 It was clear from early on in the plan-making process that Portsmouth would not be able to meet its housing need. In the SA Report⁸ to accompany the Portsmouth Pre-Submission Local Plan 2024, four city-wide spatial options for housing growth were assessed which were based on flood risk, none of which would result in meeting housing need in full. These were as follows:
- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
 - **Option H2:** Maximise housing delivery (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
 - **Option H3:** Develop some areas within FRZ2/ 3 reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet the housing need in full using the standard methodology).
 - **Option H4:** Maximise housing delivery (where possible) on sites, including sites within FRZ2/ 3 (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology).
- 5.2.3 Option H1 would result in a very small number of sites, for a very small number of homes being allocated or identified for development. Following option H2, avoiding development in flood risk zones 2 and/or 3 would mean avoiding development at some allocated and identified sites, notably at the strategic sites of Tipner West & Horsea Island East, and Tipner East, and at the site allocations of Port Solent and The News Centre.
- 5.2.4 Maximising housing delivery under options H2 and H4, would involve applying higher densities at a number of proposed strategic sites and site allocations. Higher numbers were tested at: Somers Orchard (an additional 134 homes); The News Centre (an additional 100 homes); Portsmouth City Centre (an additional 842 homes); Port Solent (an additional 100-200 homes); St James' & Langstone Campus (an additional 80 homes); and Tipner West and Horsea Island East (the top end of the range of homes was considered, at 1,250 homes).

⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PLP_SA_FINAL-1.pdf

5.2.5 The assessment of the above four options as shown on page 28 of the SA Report (2024) clearly shows that options H1 and H2 lack the positive scores of options H3 and H4 against the SA objectives on: the economy; town centres; sustainable transport; and climate change, flooding, and coastal change. Options H1 and H2 also rank the lowest of the four options against the SA objective on housing. The positive scores for options H3 and H4 against the objective in climate change, flooding, and coastal change are due to proposals for development under these options including flood defences which would provide significant benefits. The SA also explains that increasing housing delivery on key sites could improve viability for supporting infrastructure improvements.

5.2.6 The SA Report (2024) describes the Council's preferred approach as being option H3: Develop additional areas within flood risk zones 2/3 reflective of the current plan strategy. The key reasons given for this are provided in paragraphs 7.3-7.4 of the SA Report (2024) as follows:

'Option H3 [...] meets as much of the City's objectively assessed housing need, as set out in the HEDNA (2023) as possible, in line with current national policy. It takes forward all HELAA sites, in flood zones 1, 2 and 3, as either strategic sites, site allocations or identified housing sites in Appendices 2 and 3 of the draft Local Plan. The HELAA provides robust evidence to show that there are no other suitable, available or achievable sites that could be taken forward.'

If housing supply relied on sites solely within flood zone 1, Portsmouth would have a more significant deficit of homes delivered over the plan period when assessed against the housing need (using the standard methodology). The inclusion of sites within all three flood risk areas still falls short of meeting Portsmouth's housing need, signifying the importance of their inclusion. There are no sites that have been omitted based on flood risk, and therefore careful consideration is given to management and mitigation of flood risk for the lifetime of development. Detail on how development of these sites will remain safe is provided within planning policy, both in terms of the general approach to flooding in Strategic Policy PLP21: Flooding and with regard to suitable site specific requirements for Strategic Sites and Site Allocations.'

5.2.7 Having considered flood risk and wider sustainability benefits of the different options for housing growth in general, it is also worth considering the specific sustainability benefits for each site requiring the sequential test. This is based on the latest SA Report⁹ which was prepared to support the Portsmouth Pre-Submission Local Plan Addendum 2025, but which includes an appraisal of the whole Local Plan, including proposals from the Portsmouth Pre-Submission Local Plan 2024 where those have not been replaced by new policies in the Addendum. Table 6 below provides detail on the wider sustainability benefits of each site which requires the application of the exception test based on the SA Report (2025). The criteria used to assess the sustainability benefits are the ten SA objectives.

⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

Table 5: Assessment of wider sustainability benefits of each site (based on findings from section 7 of the SA Report 2025)

Site	Wider Sustainability Benefits from section 7 of SA Report (2025)	Wider Sustainability Benefits not explicitly mentioned in SA Report (2025)
Tipner West	Tipner West will deliver approximately 25,000 sqm of employment floorspace including marine uses. The delivery of employment floorspace will provide new jobs, some of which could be in the marine and maritime sectors. Tipner West, together with Tipner East, Lakeside North Harbour and Horsea Island Open Space will contribute to the vitality of Tipner, Horsea Island and Cosham through mixed-use development. Notably, Tipner West will include shops selling convenience goods including food. Policy PLP3: Tipner West safeguards land for the landfall of a new bridge connecting Tipner West to Horsea Island for the use of sustainable transport modes only. The policy also includes various other requirements to improve sustainable transport. Tipner West will deliver urgently required sea defences for the northern part of Portsea Island. Tipner West will deliver 1,000 new homes. Policy PLP3: Tipner West safeguards land for the landfall of a bridge linking Tipner West to Horsea Island. The bridge will provide easy access for new residents to Horsea Island Strategic Open Space for dog walking and other informal recreation. The Tipner West site will also include meeting places for the principal use of the local community. Development at Tipner West involves retaining, restoring and re-using listed buildings. Policy PLP3: Tipner West requires the development to create a new landmark gateway to the City. The delivery of sea defences together with site decontamination works will protect the integrity of the nearby nature conservation sites and associated habitats from harmful leachate contamination and inundation from flooding.	

	Tipner West is currently partly derelict and contains a number of unrelated land uses. The site needs significant remediation to address historic polluting uses and its redevelopment presents an opportunity to vastly improve the quality of the environment in this part of the City.	
Tipner East	Tipner East will deliver 716 sqm of commercial floorspace (classes E, F1 and F2), alongside 840 sqm ancillary commercial uses at a new transport hub. The development is expected to improve sustainable transport connections with the centre, to better unlock both this site and Tipner West & Horsea Island. Tipner East, together with Tipner West, Lakeside North Harbour and Horsea Island Open Space will contribute to the vitality of Tipner, Horsea Island and Cosham through mixed-use development. Policy PLP4: Tipner East outlines that development of a new multi-modal transport hub for the City is a key component for the vision for the site and includes various measures to help improve sustainable transport. Tipner East will involve the installation of flood barriers prior to commencement of development. Tipner East will deliver 1,056 new homes. Tipner East has a long history of polluting uses dating back to the 1890s and development of the site will involve remediation works.	
Portsmouth City Centre	Portsmouth City Centre will deliver 21,600 sqm (gross) office floorspace (1,546 sqm net). Employment provisions are therefore targeted in the most accessible areas of the City or at strategic locations that support key economic growth sectors. Portsmouth City Centre will strengthen the identity and vitality of the City Centre by delivering new homes, business premises, social / leisure venues, and community facilities. Policy PLP6: Portsmouth City Centre outlines that development within the Station Road Regeneration Area should contribute to improved connectivity within the City Centre and includes various measures to help improve sustainable transport.	

	Portsmouth City Centre will deliver 3,458 new homes. Portsmouth City Centre will provide a new park at the City Centre North part of the site. Policy PLP6: Portsmouth City Centre outlines that development within the Guildhall Cultural Regeneration Area should protect and enhance the setting of heritage assets. Policy PLP6: Portsmouth City Centre requires that existing trees are protected and opportunities are taken to plant more and provide enhanced greening. Provision of 20% Biodiversity Net Gain (BNG) is also required.	
St James' & Langstone Campus	This strategic site is allocated to deliver new educational facilities that support improvements to the educational and skills development offer in Portsmouth. St James' & Langstone Campus will deliver medical facilities, educational facilities, and recreation, sports and other community facilities, contributing to the vitality of this part of Portsmouth. Policy PLP8: St James' & Langstone Campus requires the implementation of effective sustainable transport initiatives. St James' & Langstone Campus will deliver 405 homes (417 gross) including elderly person and sheltered accommodation. Policy PLP8: St James' & Langstone Campus requires that the listed buildings on site are retained and conserved. PLP8: St James' & Langstone Campus outlines that the design and layout of the development should conserve or enhance and appropriately integrate into the distinct parkland landscape setting and open character of the site.	
Port Solent	Port Solent will deliver 500 new homes. The site benefits from being located adjacent to strategic site Horsea Island Strategic Open Space. Port Solent benefits from views towards Portchester Castle.	Marine development. Improved accessibility. Improved sea defences.
St John's College	St John's College is in a sustainable location near the City Centre.	Protection for on-site heritage assets.

	St John's College will deliver 212 new homes. The site is in walking distance of services and facilities in the City Centre.	
Fraser Range	Fraser Range will deliver 134 new homes.	New sea wall.
The News Centre	The News Centre will deliver 100 new homes.	Electric bus depot.

5.2.8 Overall Table 6 shows that development of the strategic sites and site allocations would provide wider sustainability benefits to the community that outweigh the flood risk, including a significant contribution to housing supply, delivering economic growth and regeneration, and new, much needed flood defences. It is therefore demonstrated that the first element of the Exception Test has been satisfied.

5.3 Exception Test: safe for the lifetime of the development

5.3.1 In accordance with the NPPF to satisfy the second part of the Exception Test it must be demonstrated that:

- Development will be safe for its lifetime;
- Not increase flood risk elsewhere; and
- Where possible, reduce flood risk overall.

5.3.2 The Portsmouth SFRA Level 2 provides more detailed information about the nature of flood risk at strategic sites and site allocations. The purpose of the SFRA Level 2 is to establish whether proposed strategic sites or allocations on which the emerging Local Plan will rely, are capable of being made safe throughout their lifetime without increasing flood risk elsewhere, and begin to apply the exception test, where relevant.

5.3.3 The Level 2 SFRA also identifies further work that may be required by the LPA or developers before the planning application stage, to determine satisfaction of the exception test. It provides recommendations throughout for how part 2 of the exception test could be satisfied. These will need to be evidenced as part of a site specific flood risk assessment to ensure development is made safe for its lifetime.

5.3.4 The SFRA Level 2 outlines the site specific recommendations for managing, mitigating and reducing flood risk for development. These include:

- Applying a sequential approach to land use planning to avoid flood risk. Most vulnerable uses should be steered towards areas at the lowest risk of flooding unless there are overriding reasons to prefer a different location;
- Controlling flood risk through:
 - Raising land levels to an appropriate level (above the design flood level plus freeboard);
 - Providing flood defence structures;

- Future proofing the coastal flood and erosion defences and drainage to allow for climate change impacts.
- Mitigating and managing flood risk through:
 - The inclusion of detailed wave overtopping calculations along with suitable freeboard calculation that account for uncertainty;
 - Raising finished floor levels above the design flood level, plus freeboard;
 - Providing safe access and escape during the design flood event;
 - The inclusion of places of safety during extreme flood conditions;
 - Having flood warning and emergency plans in place for occupants of the site;
 - Appropriate methods for surface water and groundwater management that dispose of it without increasing the risk of flooding elsewhere.

5.3.5 The Local Plan lists the site-specific flood measures that need to be implemented to ensure individual strategic sites and site allocations are capable of passing the exception test. There are a handful of allocations within the Local Plan that have recently been granted planning permission and as part of their development, will deliver new and improved flood defences along with other measures to reduce risk including land raising. As these sites have been granted planning permission, they are deemed to have passed the exception test.

5.3.6 In order to unlock development at Tipner West, a similar approach will be needed and the development will be required to deliver new flood defences and raise the land to an appropriate level. Although planning permission has not yet been secured, there has been ongoing work to determine how to make the site safe for its lifetime. PCC are confident that any scheme here will deliver the flood management measures required to ensure development passes the exception test. The development of the strategic site will also secure the flood protection of 208 existing homes in the Tipner area of the City.

5.3.7 The entire Portsmouth City Centre and St James' and Langstone Campus allocations are currently located within flood zone 1. As outlined in Table 3, 15.26% of the Portsmouth City Centre and 30% of St James' and Langstone Campus are expected to be in Flood Zone 2 by 2122, and 5.38% of the City Centre and 18.47% St James' and Langstone Campus are expected to be in Flood Zone 3a by 2122. If development is proposed in areas at risk of flooding within these sites, flood management measures will need to be adopted. This should include land raising at both sites, or the introduction of flood defences at St James' and Langstone Campus. There are safe routes available to evacuate residents in the event of a flood from both sites.

5.3.8 St John's College and The News Centre will be protected from flooding upon completion of the Southsea Coastal Scheme and North Portsea Island Scheme. Development at St John's College was recently granted planning permission.

5.3.9 Phase 5 (Ports Creek) of the North Portsea Island Coastal Scheme is set to be completed in 2026 and is the final phase of the scheme. This will reduce flood risk to an acceptable level at the News Centre, which will be protected in the event of a flood. Part of the site proposed for allocation for housing is not expected to be

delivered until between 2030-2035. Therefore, the defences should be in place by this point. If for any reason, the flood defence is delayed, or housing is delivered earlier, then development must be made safe for its lifetime, prioritising safe access and egress routes. PCC retain the right to refuse permission until the site is considered safe and deliverable.

- 5.3.10 The flood risk to St John's College will be reduced to an acceptable level upon completion of the Southsea Coastal Scheme in 2028. A small section (circa 50m) of the access road to the north is shown to have a moderate hazard rating in an undefended 0.5% AEP 2122 (upper end) and slightly larger extent of the road (circa 100m) in an undefended 0.1% AEP 2122 (upper end). Maximum flood depth in both scenarios is expected to be 0.1 - 0.5m and given the distance from the sea (circa 1km), there should be enough time to deliver a flood warning and/or evacuate the site prior to the onset of flooding via a route to the north if deemed necessary.
- 5.3.11 It will be possible to locate development outside of an area at risk of flooding both now and in the future at Port Solent. In the event of a tidal flood (temporary inundation of coastal areas during exceptionally high tides or storm surges) which usually occurs over a short period of time across high tide, residents will be able to remain in a place of safety on site until flood waters recede.
- 5.3.12 Tidal floods can also be predicted, as they are a combination of high tides and storm surges. Weather patterns and tides are closely monitored and will enable early warning for more vulnerable, or all residents to evacuate the site. Portsmouth's Flood Response Plan states that the Environment Agency aims to issue a warning 8 hours in advance of an event which risks overtopping coastal defences. The tidal defences for Portsmouth provide protection against a storm surge with a statistical return period ranging from 1 in 5 to 1 in 200 years.
- 5.3.13 Due to the location of Port Solent, it is highly unlikely that there will be significant damage caused by wave impact when compared to Southsea for example, which is directly on the seafront. The SFRA Level 2 does however, note that the access road to the north of Port Solent is shown to have significant hazard rating. Safe access and egress must be a priority for development at Port Solent. There are several ways in which the access route could be protected in the future. Flood defences could be improved around Port Solent; a bridge link between Horsea Island and Tipner in the future (landfall of which is safeguarded under Policy PLP3 and PLP9) could provide safe access and egress or alternatively, the access road could be altered. Development is earmarked for the final 5 years of the plan (2035-2040) and therefore, there is potential for significant alterations to the landscape and context, including updated flood risk data. Any planning application would be assessed in light of available evidence and up to date information at the time.

5.4 Conclusion

- 5.4.1 It is considered that the first element of the exception test (wider sustainability benefits) has been satisfied for development to be allocated within the Local Plan, and the second part of the exception test has been passed as far as is possible for

the plan-making stage. Further actions will be necessary by developers to fully pass the second part of the exception test as set out in the respective allocation policies, and the exception test will need to be reapplied at the planning application stage to take into account more detailed information about the proposed development and the specific mitigation proposed to make development safe and reduce flood risk overall through a site-specific flood risk assessment.