



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Telford and Wrekin Local Plan Review

PUBLICATION PLAN

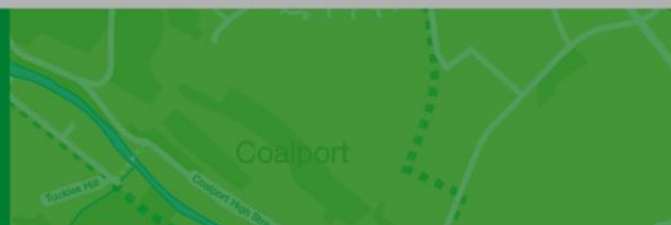
Sequential and Exception Test
Paper



2020 - 2040



March 2025



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TWLP - Sequential Test paper

1 Introduction

1.1 This document sets out how flood risk has been considered in the allocation of sites in the Telford and Wrekin Local Plan review. As part of developing the Local Plan the Council commissioned an updated Strategic Flood Risk Assessment (SFRA). This includes:

- **SFRA Level 1** – where flooding is not a major issue in relation to potential site allocations and where development pressures are low. The assessment should be of sufficient detail to enable application of the Sequential Test.
- **SFRA Level 2** – where land outside Flood Zones 2 and 3 cannot appropriately accommodate all necessary development, creating the need to apply the National Planning Policy Framework's (NPPF) Exception Test. In these circumstances the assessment should consider the detailed nature of the flood characteristics within a Flood Zone and assessment of other sources of flooding.

1.2 The Council also commissioned an updated Water Cycle Study (WCS) to provide evidence in areas such as water supply, waste water and flood risk. This document was delivered in two phases.

2 Publication Version of the Plan

2.1 The Local Plan review (2020-40) will be the main document containing planning policies and site allocations in the borough and will replace the adopted Telford & Wrekin Local Plan document.

2.2 The Council has undertaken consultation exercises on the development of the plan as well as commissioned evidence to support updated planning policy and site allocations work. This has included the Issues & Options stage and Draft Local Plan consultation, both undertaken over extended periods.

2.3 The Publication version of the Local Plan contains planning policies that will help direct development of the lowest areas of flood risk, secure better flood risk management and ensure the most efficient use of water moving forward. These policies include:

- Strategic Policy S5 Mitigating and adapting to climate change
- Development Management Policy CC4 Water re-use, conservation, efficiency and quality
- Development Management Policy CC5 Flood risk management and sustainable drainage systems
- Development Management Policy DD1 Design Criteria

2.4 Policy CC5 will help manage issues of flood risk at the planning application stage. This paper sets out how it has been considered at the allocation stage.

3 National Policy Context

3.1 The National Planning Policy Framework (NPPF) requires a Sequential Test and in some cases, an Exception Test to the development of land which could be affected by flooding. These Tests apply to both allocations in the development plan and planning applications. Therefore, a Local Plan which proposes to allocate sites in either Flood Zone 2 or 3 for development should be supported by a Sequential and, if necessary, Exception Test.

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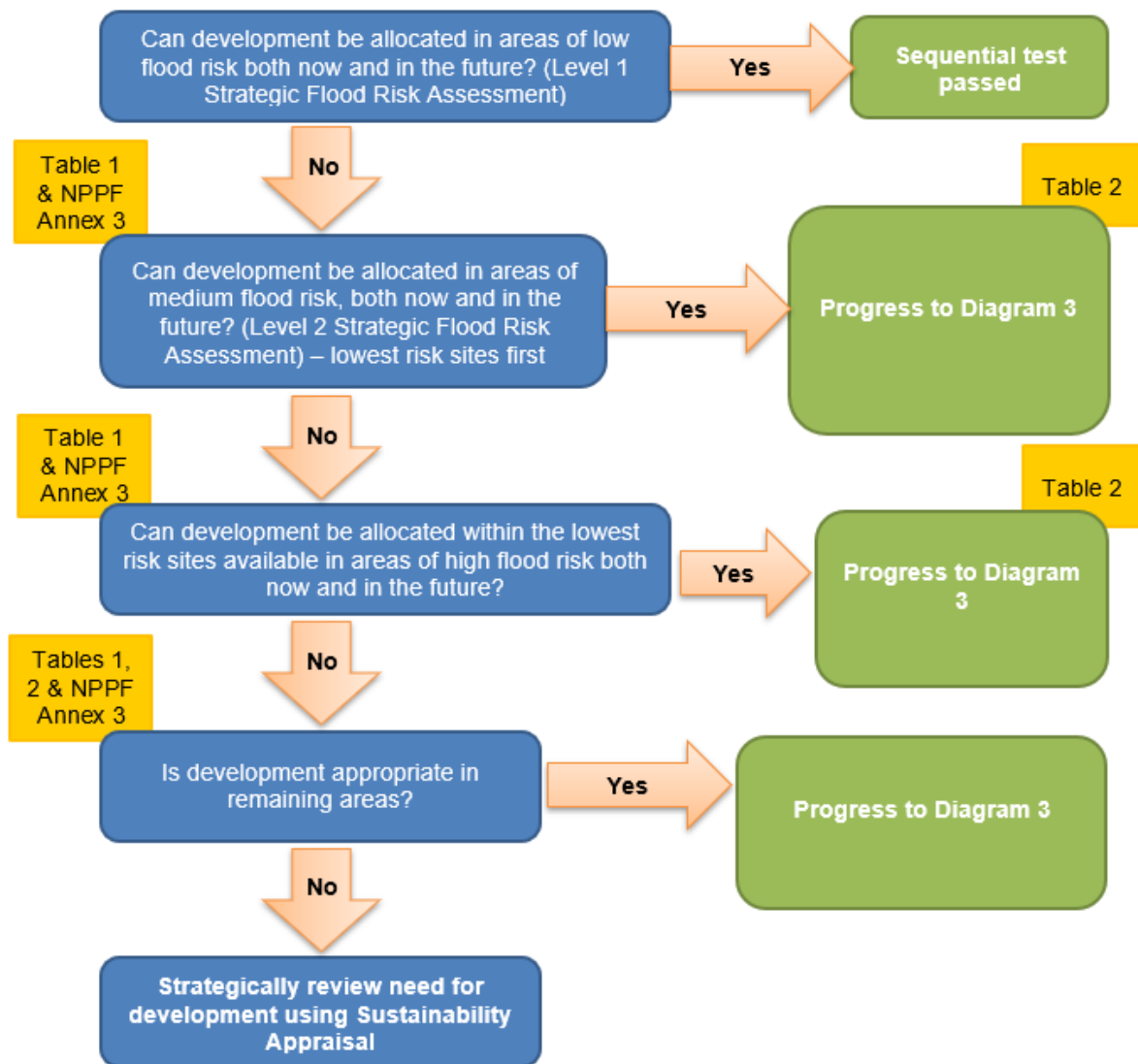
3.2 The NPPF sets out the approach to be followed in the ‘*Planning and flood risk*’ section (see paragraphs 170 to 182).

3.3 National Planning Policy Guidance (NPPG) sets out further detail on how these test should be applied in section ‘*The sequential approach to the location of development*’. Paragraph 23 states that the test:

3.4 “...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.”

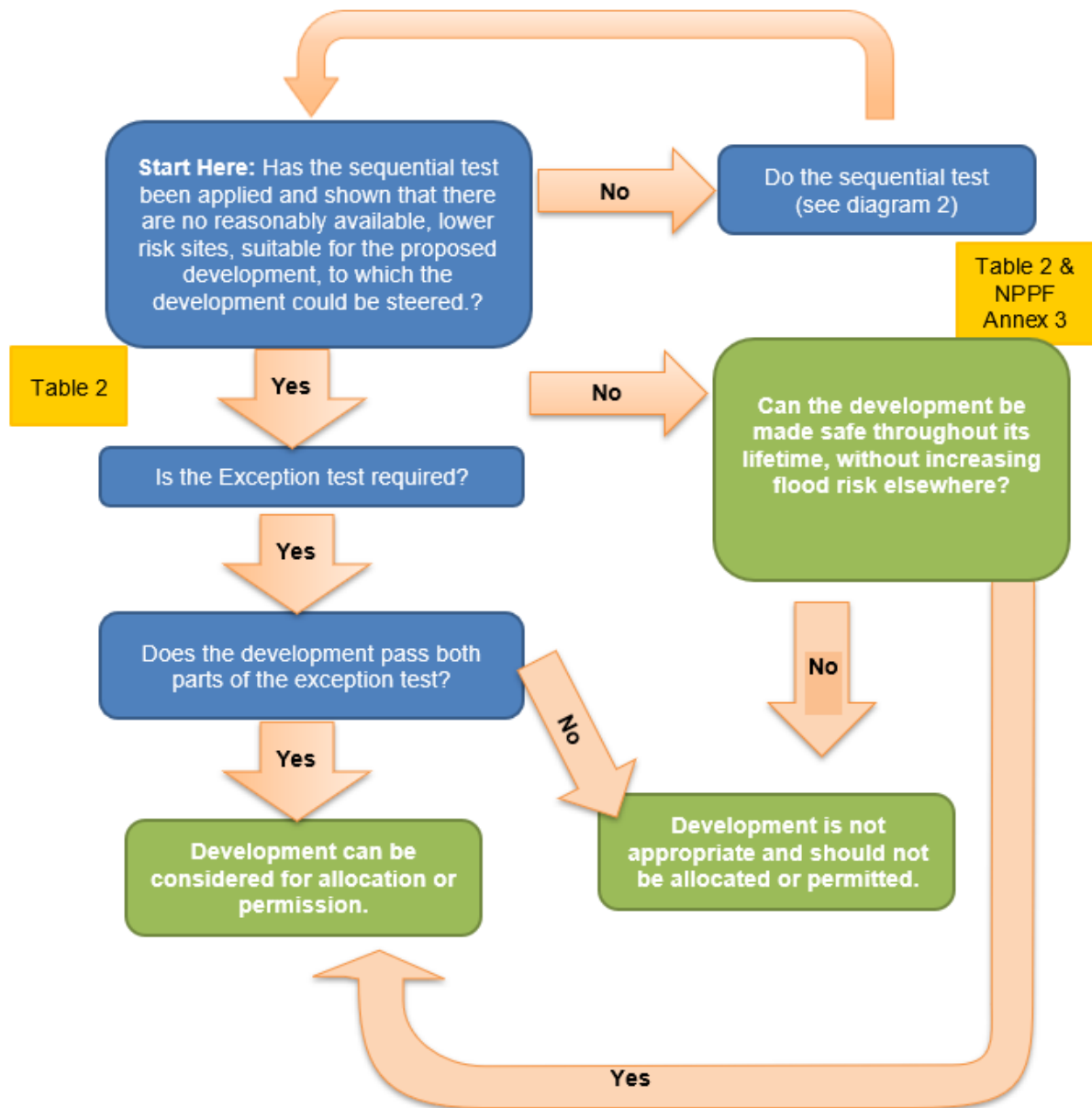
3.5 It then goes on to set out how the test should be applied illustrated by the diagram below.

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3.6 The diagram below sets out the application of the exceptions test at the plan making stage (where required).

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4 Assessment of Flood Risk for Sites

4.1 The table in Annex A shows the flood risk for all sites proposed for residential or employment use in the Local Plan from flood zones and surface water flood risk. Information on the risk of flooding is taken from the council's Strategic Flood Risk Assessment Level 1 (SFRA – Level 1) and the Integrated Appraisal document. Where the SFRA – Level 1 identified that a site was at risk of flooding, a Strategic Flood Risk Assessment - Level 2 was carried out to clarify the nature and extent of this risk.

4.2 The RAG rating system used to inform Annex A is set out below.

	RAG rating	Data source	Surface water flood risk overlap
Potential for site to flood (fluvial)	<i>Site is >80% Flood Zone 1</i>	<i>Environment Agency Flood Risk Data</i>	<i>Site overlap (%) with flood zone</i>

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	<i>Site is 20-50% Flood Zones 2 or 3</i>		
	<i>Site is >50% Flood Zones 2 or 3</i>		
Surface Water Flood Risk	<i>Site is >10% within 30 year area of risk</i>	Council provided SFRA	Site overlap (%) with flood zone
	<i>Site is >10% within 30 year area of risk</i>		

4.3 At the time producing the SFRA Level 2 58 sites that were under consideration for Regulation 19 were screened on matters of flood risk. A RAG rating was used to determine the need for further investigation on the basis that:

- **Red sites** needed a Level 2 assessment and have significant obstacles or challenges for development which will need consideration going forward for development. These sites may need the Exception Test to show that the site can be developed safely from a flood risk perspective.
- **Amber sites** did not need a Level 2 assessment but are flagged in this report for developer considerations, but these are likely to be able to be addressed at the planning application stage. These sites are included within this report as they may have some surface water issues relative to access and egress to the site.
- **Green sites** that had no significant flooding obstacles for development. However, it is noted sites may need an FRA and drainage strategy depending on the location and size of the site.

4.4 21 sites have been assessed as part of the Level 2 SFRA and have accompanying site guidance sheets that will help inform planning applications. The remaining 37 sites screened do not require Level 2 assessment, however developers should consider the overall recommendations of the SFRA Level 2 report. Not all the sites screened in the report were ultimately selected as land allocations.

4.5 The sites that have been selected as allocations:

- Have minimal areas of flood zone coverage
- Have minimal areas at risk of surface water flooding
- Can reasonably accommodate development outside areas at risk of flooding

4.6 Of those sites taken forward for assessment in SFRA – Level 2 none required an exceptions test to be applied at the allocation stage.

4.7 The former AGA works at Coalbrookdale was identified as requiring an exception test as part of the planning application process due to historic flooding issues. The site is derelict and requires regeneration and has an active site owners, therefore it has been allocated within the Local Plan to provide certainty in the development process.

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4.8 In the Publication version of the Local Plan the Council have allocated three Sustainable Communities sites to the north of Telford. These sites are made up of a number of individual site parcels that were originally submitted through the call for sites process. These are strategic sites and the coverage of flood zones for each is set out below:

Land North of A442 Wheat Leasows (Wappenshall)

- Site area: 278.31 hectares
- Flood zone coverage: FZ1 91%, FZ2 9% and FZ3 4% (FZ3 is wholly contained within FZ2)
- The whole site is more than 80% in FZ1 which would give a positive RAG rating above for fluvial flood risk

Land North-East of Muxton

- Site area: 181.90 hectares
- Flood zone coverage: FZ1 90%, FZ2 10% and FZ3 6% (FZ3 is wholly contained within FZ2)
- The whole site is more than 80% in FZ1 which would give a positive RAG rating above for fluvial flood risk

Land at Bratton

- Site area: 112.47 hectares
- Flood zone coverage: FZ1 84%, FZ2 16% and FZ3 11% (FZ3 is wholly contained within FZ2)
- The whole site is more than 80% in FZ1 which would give a positive RAG rating above for fluvial flood risk

4.9 THE SFRA level 2 recognises that there will be a need for a site specific Flood Risk Assessments to be carried out on each of the Sustainable Communities sites as part of the planning application process. Some of the individual parcels of land shown as being more at risk of flooding in Table 1 have been taken forward as part of these larger strategic sites and therefore form a smaller proportion of flood risk in the overall strategic site. Each of the three Sustainable Communities sites have site assessment sheets as part of the SFRA Level 2.

4.10 The SRRA Level 2 contains a report and maps and a site sheet for each site examined. Each site report quantifies the flood risk and advises on actions a developer may need to take as part of any future planning applications.

4.11 Table 1 gives the flood risk from the SFRA Level 2 where appropriate and the relevant information from the site guidelines. From this it can be seen that the Publication version of the Telford and Wrekin Local Plan **does not propose development in either Flood Zones 2 or 3** (i.e. all development can reasonably be accommodated in Flood Zone 1) and thus in line with the requirements of the NPPF and NPPG in that **the Sequential Test is passed and there is no requirement for the Exception Test.**