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Flood Risk Sequential Test Report

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Flood Risk Sequential Test Report
Medway Council

Contents Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Written by	Checked by
1	0	Draft report	February 2025	AB	AW
2	1	Amendments. Draft report reissued	March 2025	AB	AW
3	2	Updated site allocations. Minor amendments. Draft report reissued	April 2025	AB	AW
4	3	Final report issued	May 2025	AB	AW

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1. Introduction

Medway Council has produced a new Local Plan, replacing the 2003 Medway Local Plan. This will be a single document, containing strategic level policies, land allocations, (including minerals and waste workings), and a policies map.

The plan will cover the period up to 2041, providing for the number of homes, jobs, and supporting infrastructure, such as transport, health facilities, schools and parks, to meet the needs of the growing population over this time.

Subject to outcomes of an independent examination by a planning inspector, it is anticipated that Medway's Local Plan will be adopted by the end of 2026.

Medway Council has used the Standard Method for calculating Local Housing Need. The annual need is for 1658 homes, or nearly 28,000 over the plan period, which is a challenge to accommodate with the range of constraints in Medway.

The Development Strategy report published in 2018 as a consultation document informing the preparation of the plan presented four development scenarios that could provide a spatial strategy for the new local plan. The Council received comments on the consultation document and updated information from site promoters that was used to prepare a further iteration of the Strategic Land Availability Assessment.

Further work was then undertaken to assess the sustainability and feasibility of these options, looking at detailed infrastructure planning, viability testing, transport capacity and impacts, potential environmental impacts and economic considerations, and opportunities for mitigation. Assessments were carried out at a strategic location level and for individual sites. This iterative assessment identified sites and broad locations that could provide for the spatial strategy. This has provided the proposals in the draft local plan to be published in 2025.

2. Background

Paragraph 172 of the National Planning Policy Framework (NPPF, December 2024) states:

"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 Local Planning Authority undertook an interactive Strategic Land Availability Assessment (SLAA) in 2015, 2017, 2018, 2019, and 2023, which linked to work on the preparation of the plan, and key 'Regulation 18' consultation stages. However, these assessments did not identify sufficient land suitable and available to meet Medway's anticipated growth needs over the Local Plan period. The latest Medway SLAA was published in 2023, and it was informed by the successful outcome of the Housing Infrastructure Fund that provided investment for transport and environmental mitigations that would support growth on the Hoo Peninsula; and the publication of town centre masterplans for Chatham, Gillingham and Strood which identified additional capacity for urban regeneration. This work has fed into further technical assessments to inform the proposed spatial strategy in the draft plan.

3. Scope

This report has been prepared to review sites considered as part of the Local Plan process to identify which sites can be allocated within lower risk areas using the Level 1 SFRA, and identify which sites located within higher risk areas could be allocated via further assessment within the Level 2 SFRA. The Level 2 SFRA will inform an evidence base for application of a detailed Exception Test at planning application stage where it is required.

This document will also provide an evidence base for the Local Planning Authority to inform the setting of strategic and development management policies.

The report is structured as follows;

- Section 4 and 5 provides an overview of current Sequential and Exception Test policy, contained within the NPPF and National Planning Policy Guidance (NPPG).
- Section 6 gives an overview of the wider flood risk policy applicable to the area.
- Section 7 includes the Sequential Test methodology and outputs.
- Section 8 provides a summary and conclusions.

4. Sequential Test Overview

Paragraphs 173-177 of the National Planning Policy Framework (NPPF) and 023-029 in the National Planning Policy Guidance (NPPG) *Flood and Coastal Change* sets out the approach for applying the Sequential Test.

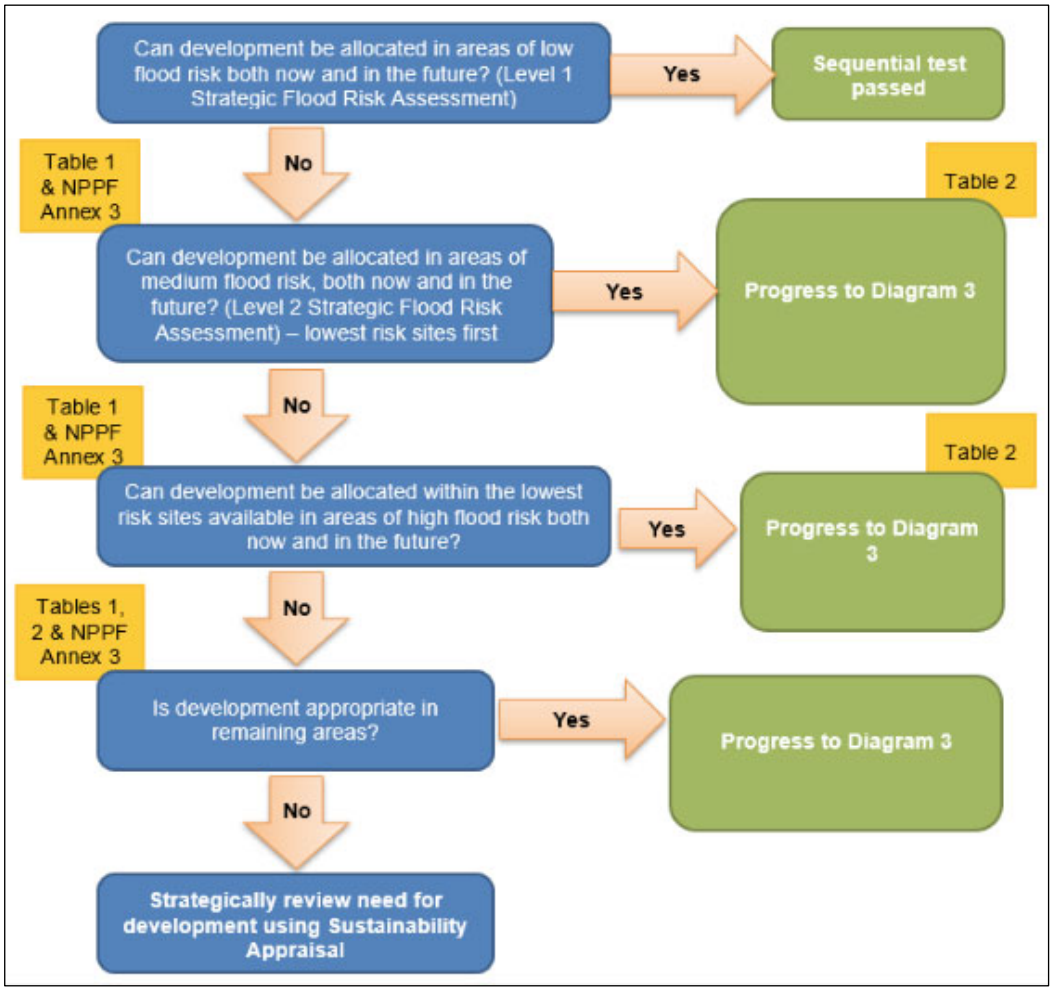

Figure 4.1 – NPPG Flood and Coastal Change process for applying the Sequential Test (contains Flood Risk and Coastal Change NPPG © Crown copyright and database right 2025).

The aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding and not allocate development if there are reasonable available sites in areas at lower risk. The Level 1 SFRA provides the basis for applying this test.

The NPPF states that the Sequential Test should take into account all sources of flood risk and the current and future impacts of climate change. As part of the Level 1 SFRA, a 'Potential Risk of Flooding' map has been produced which provides the starting point for sites which may require the Sequential Test. As part of the map, the following sources of flooding have been considered;

- Tidal
- Fluvial
- Surface water
- Reservoirs

Information of flood risk from these sources has been provided by the Environment Agency as part of various mapping, details of which have been provided within the SFRA Level 1.

It should be noted that the risk of flooding from other sources such as sewers, groundwater or ordinary watercourses has not been considered as part of the Sequential Test process applied to inform the site allocation. This is due to lack of reliable information being available for these sources, i.e. the risk of flooding from groundwater is part of ongoing monitoring via flood incident data collection.

Risks of flooding attributed to ditches and streams is relevant in Hoo from the Hoo Stream. A separate Surface Water Management Plan study has been undertaken for Hoo which appraises the impact of development on the catchment and tests options to reduce flood risk throughout the urban area. The outputs of the study indicate where development offers opportunity to reduce the risk of flooding throughout the catchment.

Paragraph 024 of the NPPG Flood and Coastal Change states that where it is not possible to locate development in lowest risk areas, the Sequential Test should compare sites within 'medium' risk areas first, before moving on to considering sites in 'high' risk areas. Consequently, the following definitions have been used to define, 'low', 'medium' and 'high' risk areas.

Tidal and Fluvial Flood Risk

Flood zones as defined by the Environment Agency have been considered and the following distinction have been made;

Zone 2 – *Medium probability of flooding* – This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding or between 1 in 200 and 1 in 1000 annual probability of sea flooding in any one year.

Zone 3a – *High probability of flooding* - This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding or 1 in 200 or greater annual probability of sea flooding in any one year.

Paragraph 024 of the NPPG goes on further to state that existing flood risk management infrastructure should not be considered initially. The flood zones show the flood extent if all defences were to be removed and therefore these have been used to define the potential flood risk from tidal and fluvial sources. Nevertheless, reference to Section 6 identifies that there are

important Strategic Flood Risk Policies in place for Medway which have subsequently been taken into consideration as part of the more detailed SFRA L2 appraisal.

Surface Water Flood Risk

For the purpose of applying a Sequential Test to sites at risk of surface water flooding, the following two events have been used.

> *Medium risk where the chance of flooding is between 1% and 3.3% (between a 1 in 30 and a 1 in 100-year chance).*
>
> *High surface water flood risk where the chance of flooding is greater than 3.3% (1 in 30 chance each year).*

These events are broadly considered to be commensurate with the associated risks to developments proposed within areas at risk of tidal and fluvial flooding within NPPF/NPPG. It is also on the basis that there is more uncertainty associated with estimations of low risk, albeit this threshold should still be appraised when considering mitigating actions at a planning application stage.

Each potential site allocation was assigned a net and gross developable area by the LPA to estimate density and number of units which could be delivered. The gross area is representative of the red line boundary of a site, and the net area representative of the likely developable area considering a 40% reduction, to account for reductions to facilitate infrastructure and green space.

To apply a Sequential Test, sites where the risk of surface water under a high or medium scenario is less than 40% of the gross site area, were considered to pass the Sequential Test. Sites where the risk of surface water flooding under a high or medium scenario is equal to or greater than 40% were considered to not pass the Sequential Test and have been taken forward to the Exception Test.

This conservative approach identifies sites where allocated development capacity may not be achieved, and where flood risk and open space provision need to be carefully considered. Depending on the nature and scale of the risk, a detailed Flood Risk Assessment may demonstrate that a reduction in risk and a betterment can be achieved over the existing situation but would need to be appraised at detailed level should such sites be allocated.

In addition, Paragraph 175 of the NPPF states;

"The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no build development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."

Consequently, where a detailed site-specific analysis identifies that all build development for a site, in accordance with Paragraph 175 of the NPPF, can be located outside areas shown to be at risk of flooding now or in the future, these sites can be considered to have passed the Sequential Test.

The number of units and or extent of commercial provision for sites where the risk is equal to or greater than 40% of the site area may need to be reviewed. Sites which are not considered to have passed the Sequential Test should be subject to both parts of the Exception Test.

Reservoir Flood Risk

Whilst there are no potable reservoirs within Medway, water levels within the River Medway could be impacted by three reservoirs. Reservoirs are subject to strict maintenance requirements and as such, the risk of a failure is extremely low. In addition, the extent of reservoir flooding is comparable to the extent of Flood Zone 2, except for a few isolated locations. Therefore, the risk of flooding from reservoirs has only been considered to distinguish between sites which have already been identified to be at risk of flooding from any of the other sources above.

Based on the above, if following the application of the Sequential Test, it is not possible, consistent with wider sustainability objectives for the sites to be located in areas with a lower probability of flooding, the Exception Test can be applied.

5. Exception Test Overview

The requirement for an Exception Test is dependent on the flood risk vulnerability classification for the type of development proposed. Flood Risk Vulnerability classifications for different development types are set out within Table 2 of the NPPG *Flood and Coastal Risk,* see Table 4.1 below.

Table 3; *Flood Risk Vulnerability Classification* within the NPPG contains a matrix to apply to ascertain if, after taking the Sequential Test, a development is appropriate according to the Flood Zone attributed to the site and confirms when an Exception Test is required on this basis. Table 5.1 below provides a summary of the flood risk vulnerability classification and the requirement for the Exception Test depending on the related Flood Zone.

Flood Risk Vulnerability Classification	Zone 1	Zone 2	Zone 3a	Zone 3b
Essential Infrastructure – Essential transport infrastructure, strategic utility infrastructure, including electricity generating power stations.	✓	✓	e	e
High Vulnerability – Emergency services, basement dwellings, caravans and mobile homes intended for permanent residential use.	✓	e	×	×
More Vulnerable – Hospitals, residential care homes, buildings used for dwelling houses, halls of residence, pubs, hotels, non-residential uses for health services, nurseries and education.	✓	✓	e	×
Less Vulnerable – Shops, offices, restaurants, general industry, agriculture, sewerage treatment plants.	✓	✓	✓	×
Water Compatible Development – Flood control infrastructure, sewerage infrastructure, docks, marinas, ship building, water-based recreation etc.	✓	✓	✓	✓
Key : ✓ Development is appropriate × Development should not be permitted e Exception Test required				

Table 5.1 – Flood risk vulnerability and flood zone incompatibility.

Paragraph 031 of the NPPG Flood and Coastal Change describes the Exception Test as a method to demonstrate and ensure that flood risk to people and property is managed satisfactorily. It consists of two parts:

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.*

Diagram 3: Application of the Exception Test to Local Plan Preparation within the NPPG (Figure 5.1 below) advises how to apply the Exception Test to a Local Plan preparation.

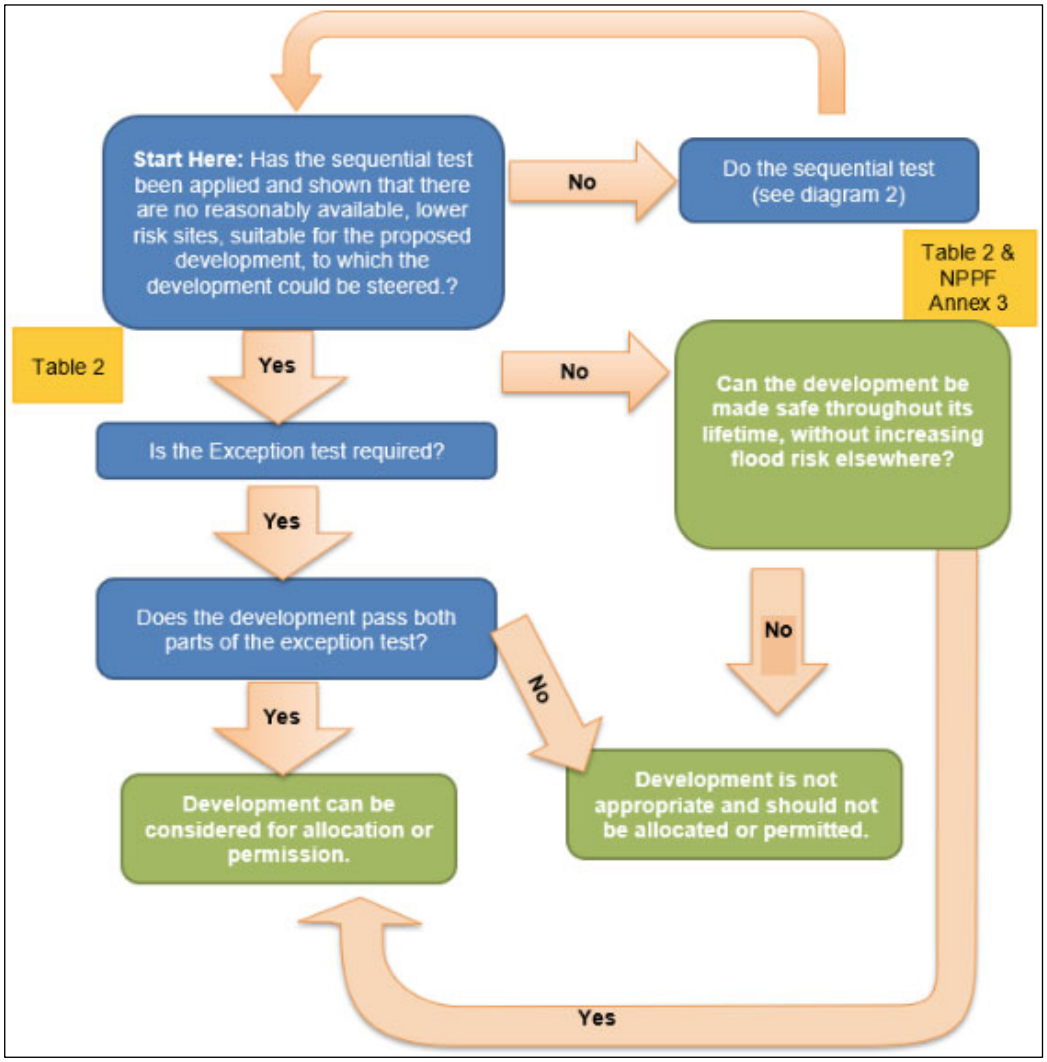

Figure 5.1 – NPPG Flood and Coastal Change application of the Exception Test to Local Plan (contains NPPG Flood Risk and Coastal Change © Crown copyright and database right 2025).

However, without detailed site-specific information, it is not possible to apply an in-depth Exception Test at a Local Plan stage, but it is possible to highlight key flood risk issues. Therefore, sites

identified in this report where the Exception Test is required will be subject to high level appraisal via a Level 2 SFRA which will inform a site-specific Exception Test where required.

Paragraph 036 of NPPG Flood and Coastal Change states that evidence of wider sustainability benefits to the community (Part A) should be demonstrated via the Sustainability Appraisal. If a potential site allocation fails to score positively against the aims and objectives of the Sustainability Appraisal, the LPA will consider whether the use of planning conditions and/or obligations can make it do so.

It is the role of the LPA to allocate sites on the basis of the evidence provided within this report, the Level 2 SFRA, and the Sustainability Appraisal.

The latest Level 1 SFRA 2025 sets out how a development may be made safe. It includes measures such as (but not limited to), raising floor levels, flood resistance and resilience, provision of flood risk infrastructure, use of Flood Warnings, and consideration of evacuation issues for the safe access and egress of occupiers and residents. An accompanying Technical Guidance sets out criteria for developers for the management of surface water.

Paragraph 006 of the NPPG Flood and Coastal Change confirms that the lifetime of a development in the context of flood risk is at least 100 years for residential development. The lifetime of a non-residential development depends on the characteristics of that development but a period of at least 75 years is likely to form a starting point for assessment.

6. Strategic Flood Risk Policy

As well as applying the Sequential and Exception Tests outlined in the NPPF and NPPG, potential development sites should be reviewed against wider flood risk objectives. There are several plans applicable to the area including:

- Medway Estuary and Swale Shoreline Management Plan (SMP), 2010
- Medway Council Local Flood Risk Management Strategy, 2024
- Isle of Grain to South Foreland Shoreline Management Plan (SMP), 2010
- Thames Estuary 2100 Plan, 2023

SMPs guide the approaches that should be taken to manage coastal flood and erosion risk over the next 100 years.

The Isle of Grain SMP covers a small part of marshland between Allhallows and Grain, and includes an area also covered by the Thames Estuary 2100 Plan. Similar to SMP's, the Thames 2100 Plan sets out a strategic flood risk management plan for London and Thames Estuary through to the end of the century.

Sites which have been taken forward for further assessment via SFRA L2 will be listed against the preferred above options (where applicable) to identify sites where a developer and the LPA should take account of opportunities for development to contribute towards the preferred option as a beneficiary.

7. Application of Sequential Test

The Sequential Test was undertaken in an iterative manner throughout the Local Plan process. Firstly, it was applied to the development scenarios within the Development Strategy Consultation, and with reference to Figure 4.1: NPPG *Flood and Coastal Change* process for applying the Sequential Test. The sites mentioned within the following sections are listed accordingly in Appendix A.2.

7.1. Sites located within Low Risk Areas

There are a total of 44 sites which are identified to be in Flood Zone 1 and at 'very low' to 'low' risk of surface water flooding. These 44 sites are therefore considered to pass the Sequential Test. In addition, the Exception Test is not considered required for these sites.

7.2. Sites located within Medium Risk Areas

36 sites are located within Flood Zone 1 that have been identified to have a 'high' surface water risk which covers less than 5% of the gross site area, and a 'medium' surface water risk which covers less than 40% of the gross site area. As outlined in Section 4, these sites have been considered to pass the Sequential Test as it is concluded that in accordance with Paragraph 175 of the NPPF, allocated development capacity can be achieved outside the risk areas, ensuring that only low risk areas are developed.

There are 11 sites which are located within Flood Zone 1, that have been identified to have a 'high' surface water risk which covers greater than 5% of the gross site area, and a 'medium' surface water risk which covers greater than 40% of the gross site area. These sites have been taken forward to the SFRA L2 assessment as part of the Exception Test.

4 sites are located within both Flood Zone 1 and 2, have less than 10% of the gross area located within Flood Zone 2, that have been identified to have a 'high' surface water risk which covers less than 5% of the gross site area, and a 'medium' surface water risk which covers less than 40% of the gross site area. These sites are considered to pass the Sequential Test. The Exception Test will only be applicable if 'highly' vulnerable elements are proposed on these sites. These sites have therefore still been taken forward to the SFRA L2 assessment to appraise the potential impacts of climate change and ensure development can be made safe in the future

7.3. Sites located within High Risk Areas

Out of all the sites located within Flood Zone 3 or partly within Flood Zone 3 (including 'medium' and 'high' risk of surface water flooding), 23 sites are located within Flood Zone 3b. Flood Zone 3b is defined as follows in Paragraph 078 of the NPPG Flood and Coastal Change;

> *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).

The NPPG goes on further to state that local circumstances should be taken into account when defining the functional floodplain and the identification should not be based on probability parameters only. Consequently, where areas normally located in the functional floodplain would be prevented from flooding by existing defences or solid buildings, these have not been considered to be classified as functional floodplain. In addition, reference to Table 5.1 states that only essential infrastructure and water-compatible uses should be situated within Flood Zone 3b.

For the 37 sites located in Flood Zone 3 or partly within Flood Zone 3, the Exception Test may be applicable, depending on the vulnerability classification. Nevertheless, these sites have been taken forward to the SFRA L2 assessment as part of the Exception Test.

The total number of sites to be taken forward for further appraisal via a Level 2 SFRA is 52. This includes sites which are shown to require the Exception Test according to Table 5.1 and / or where the medium and high surface water risk is greater than 40% or 5% of the gross site area respectively. This is based on a site-specific basis and discounts wider Opportunity Areas identified and accounted for above to avoid duplication.

8. Summary and Conclusions

This report has applied a Sequential Test to the initial sites identified and included within the Development Strategy Consultation and to sites identified as part of a preferred option to filter which sites require further appraisal as part of a high-level Exception Test within a Level 2 SFRA.

Further appraisal via a Level 2 SFRA which seeks to apply a high-level Exception Test and inform the Sustainability Appraisal will be undertaken. However, due to inherent uncertainties associated with applying Part B of the Exception Test at a high level, against site specific conditions identified at detailed planning stage, Part B of the Exception Test should be fully applied within any Flood Risk Assessment accompanying a site application which is included within the Level 2 SFRA. The LPA will advise if Part A of the Exception Test needs to be reapplied.

Paragraph 031 of the NPPG Flood and Coastal Change states that where other sustainability benefits to the community that outweigh flood risk issues, the decision-making process should be transparent with reasoned justification for any decision to allocate land at areas of high risk in the Sustainability Appraisal report.

The outputs of this Sequential Test report, and the Level 1 and 2 SFRA should therefore be considered alongside the Sustainability Appraisal to determine if site allocation is appropriate based on flood risk evidence and criteria within the SA.

A. Appendices

Appendix A.1 – Flood Risk Vulnerability Classification

Appendix A.2 – Application of the Sequential Test Sites

Appendix A.1 – Flood Risk Vulnerability Classification

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; including electricity generating power stations, grid and primary substations storage; 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.

Appendix A.2 – Application of the Sequential Test Sites

Sites located within Low Risk Areas

Sites located within Flood Zone 1 and at 'very low' to 'low' risk of surface water flooding

Sites (LAA ID)			
RN17	RN29	SNF9	HW6
HHH5	AS11	LW6	CCB12
SNF20	GN8	L12	GS35
CCB30	RWB11	SW7	GS7
RN22	FP1	CCB39	W4
CCB41	GS4	FP12	GS26
AS10	T3	GS2	GS23
CCB19	HHH15	CCB3	SW6
L7	GS19	CCB4	LW2
GS14	FP16	RN24	CCB49
HW11	SNF44	RWB5	CHR18

Sites located within Medium Risk Areas

Sites located within Flood Zone 1, 'High' risk of surface water flooding that is less than 5% of the gross site area, and at 'Medium' risk of surface water flooding that is less than 40% of the gross site area.

Sites (LAA ID)	'High' Surface Water Percentage Coverage	'Medium' Surface Water Percentage Coverage
SNF1	1.2%	0.8%
HHH26	2.9%	6.9%
HHH25	0.3%	11.1%

Sites (LAA ID)	'High' Surface Water Percentage Coverage	'Medium' Surface Water Percentage Coverage
HHH29	0.6%	0.9%
AS25	2.2%	1.0%
AS6	3.1%	1.4%
LW4	1.4%	1.4%
HW3	0.9%	0.1%
SR7	0.5%	1.5%
HHH11	0.2%	2.1%
LW7	0.3%	0.1%
HHH33	0.4%	0.3%
LW8	0.4%	0.0%
RN30	0.0%	1.2%
RN31	2.0%	0.1%
SNF3	1.0%	0.1%
HHH8	2.6%	4.8%
HHH3	1.1%	0.4%
CCB37	2.8%	0.3%
FP10	0.9%	3.7%
RWB12	0.0%	19.1%
L9	0.0%	5.9%
W7	4.1%	4.1%
RN25	0.9%	11.0%
SR25	0.4%	0.4%
SR5	0.1%	0.1%
RN9	0.9%	1.1%

Sites (LAA ID)	'High' Surface Water Percentage Coverage	'Medium' Surface Water Percentage Coverage
SNF27	0.0%	9.9%
SR14	0.2%	0.1%
HHH41	2.6%	0.6%
SR51	1.9%	0.3%
FP6	2.5%	3.6%
FH1	0.6%	3.1%
HHH19	2.9%	1.4%
CHR16	0.1%	0.1%
CHR17	0.0%	0.1%

Sites located within Flood Zone 1, 'High' risk of surface water flooding that is greater than 5% of the gross site area, and at 'Medium' risk of surface water flooding that is greater than 40% of the gross site area.

Sites (LAA ID)	'High' Surface Water Percentage Coverage	'Medium' Surface Water Percentage Coverage
AS2	15.2%	4.3%
HHH24	6.9%	0.2%
LW10	7.1%	15.3%
HHH6	13.8%	5.1%
RN23	5.8%	4.2%
SR4	8.9%	0.6%
CCB1	20.1%	13.6%
RWB19	47.3%	19.9%
REWW3	17.9%	10.8%
SNF5	12.0%	8.2%
FP25	17.4%	28.0%

Sites located within Flood Zone 1 and 2, where less than 10% of the gross area located within Flood Zone 2, that have been identified to have a 'high' surface water risk which covers less than 5% of the gross site area, and a 'medium' surface water risk which covers less than 40% of the gross site area.

Sites (LAA ID)	Flood Zone 2 Percentage Coverage	'High' Surface Water Percentage Coverage	'Medium' Surface Water Percentage Coverage
CCB15	8.1%	1.6%	0.0%
SNF8	3.1%	0.0%	0.0%
CCB20	5.8%	0.0%	0.1%
SNF17	1.0%	3.0%	1.3%

Sites located within High Risk Areas

Sites located within Flood Zone 3 or partly within Flood Zone 3 (i.e., in multiple flood zones)

Sites (LAA ID)			
CHR14	HHH32	HHH12	SNF41
SNF35	SMI6	FP11	AS28
CCB27	GN6	SR49	SNF15
SNF23	SNF32	CCB21	CCB24
SNF30	CCB31	RWB2	SNF34
SR48	CCB7	FP14	SNF38
CCB25	SNF31	SNF24	CCB8
GN15	RWB25	GN3	HHH22 & HHH31
SR53	CCB35	SMI6	HHH35
HHH36			