THREE RIVERS DISTRICT COUNCIL

SEQUENTIAL AND EXCEPTION TEST REPORT

July 2026

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1. INTRODUCTION

1.1. The National Planning Policy Framework (NPPF) requires the sequential and exception tests to be applied when assessing development sites. The application of a sequential, risk-based approach to the location of development ensures the Local Plan takes into account all sources of flood risk and the current and future impact of climate change, as to avoid, where possible, flood risk to people and property.

1.2. This report summarises the council's approach to the sequential test and exception test, and to support the site allocations proposed in the Local Plan. To facilitate the preparation of both the sequential test and exception test, this report is supported by the recommendations from the council's Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA). It also serves as a supporting document in the evidence base and informs the site selection process in the Local Plan.

2. THE EXCEPTION TEST AND SEQUENTIAL TEST

The Sequential Test

2.1. Under the requirements of the NPPF, local planning authorities are required to apply a sequential, risk-based approach when assessing development sites. According to Paragraph 174 of the NPPF, the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. 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 SFRA will provide the basis for applying this test.

2.2. 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 built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that contains relatively high or significant risk of flooding from any source, now and in the future (having regard to potential changes in flood risk). Planning Practice Guidance (PPG) on Flood Risk and Coastal Change has provided a definition for each flood zone (Table 1).

Table 1. Definition of Flood Zones (extracted from PPG on Flood Risk and Coastal Change)

Flood Zone	Definition
Flood Zone 1 - Low Probability	Less than 0.1% annual probability of river or sea flooding.
Flood Zone 2 - Medium Probability	Between a 0.1% and 1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding.
Flood Zone 3a - High Probability	1% or greater annual probability of river flooding; or land having a 0.5% or greater annual probability of sea flooding.
Flood 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.

The Exception Test

2.3. After application of the sequential test, the exception test is applied if the sequential test demonstrates that it is not possible for development to be located in areas with a lower risk of flooding. According to the NPPF, the need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification.

2.4. Furthermore, the application of the exception test should be supported by a strategic or site-specific Flood Risk Assessment, depending on whether it is being applied during Local Plan production stage or at the planning application stage. Under the requirements in the NPPF, in order to pass the exception test, the site should be able to demonstrate that:

- the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

2.5. Both elements of the exception test should be satisfied for development to be allocated or permitted. Table 2 sets out the circumstances when the exception test will be required, and Table 3 shows the definition of flood risk vulnerability of development (Flood Risk Vulnerability Classification).

Table 2. Flood Risk Vulnerability and Flood Zone 'Incompatibility' (extracted from PPG on Flood Risk and Coastal Change)

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**	✓

Table 3. Flood Risk Vulnerability Classification (extracted from NPPF)

Vulnerability Classification	Use / Development Types
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.

3. SITE SELECTION AND TEST RESULTS

3.1. Three Rivers is a mixture of countryside, villages and small towns. Most of the brownfield land has been developed in Three Rivers, while greenfield sites are often highly constrained. Over three quarters (76%) of the district is designated as Green Belt, with Green Belt boundaries generally closely related to the urban areas of the small and medium sized settlements which are distributed evenly across the district. Furthermore, there are various environmental constraints in Three Rivers including Chilterns National Landscape, a number of Sites of Special Scientific Interest, various Local Nature Reserves and Local Wildlife Sites, rivers and canals, and areas at risk of flooding.

3.2. The council published its Level 1 and Level 2 SFRA in February 2026, assessing the flood risk of Three Rivers and proposed sites for allocation in accordance with the requirements in the NPPF. The Level 1 SFRA is a high-level strategic document reflecting overall flood risk of the assessment area. The Level 2 SFRA focuses on potential flood risk at a specific site level and provides recommendations to mitigate flood risk for future development.

3.3. According to the Level 2 SFRA, out of 368 sites submitted as part of the Local Plan process, 72 have been identified as potential sites for development. Among the 72 sites, 33 sites were identified as being at some level of flooding risk. Out of the 33 sites, 29 sites were identified as requiring a level 2 assessment due to the criteria stated below:

- the proportion of the site in each Flood Zone derived from the Environmental Agency (EA) New national flood risk assessment 2 (NaFRA2) Flood Map for Planning and detailed hydraulic model outputs;
- the proportion of the site affected by climate change within the EA's NaFRA2 Flood Map for Planning plus Climate Change dataset;
- whether the site is shown to be at risk from surface water flooding in the Risk of Flooding from Surface Water mapping for the 3.3%, 1%, and 0.1% Annual Exceedance Probability (AEP) events, and the Risk of Flooding from Surface Water plus Climate Change dataset for the 3.33% and 1% AEP events;
- whether the site is within, or partially within, the reservoir 'Dry Day' or 'Wet Day' flood extents;
- whether the site is within, or partially within, the EA Historic Flood Map dataset;
- whether the site contains a watercourse shown within the ordinary watercourses layer provided by Hertfordshire County Council;
- whether the site is within 100m of a canal; and
- whether the site is >10% within highest risk category (where groundwater is <0.025m below the surface in the 1% AEP event)

3.4. The Minister of State for Planning and Housing intervened in the Three Rivers Local Plan in March 2026, directing the council to include seven additional sites for allocation in the Local Plan. These sites have also been assessed in the Level 2 SFRA to examine the possible flood risks based on the criteria stated above.

Sequential Test

3.5. The sequential test includes the sites that were screened for flood risk in the Level 2 SFRA, and the intervention sites which identified as having some flood risk (Table 4). All of the selected sites are sequentially classified based on the level of risk present, proportion of area situated in Flood Zone 2 and/or 3, and vulnerability of development. Sites wholly within Flood Zone 1 with fewer risk elements are preferrable for development as compared with the sites within Flood Zone 2 and/or 3 with more risk elements. The sequential test also helps determine whether the exception test is required for the sites with more risk elements. In short, the test process demonstrates the appropriateness of the selected site for allocation in terms of flood risk.

Table 4. Application of the Sequential Test

Site with SHELAA ref	% in Flood Zone (FZ2/3)	Highest Risk Elements on site	Proposed Land Use	Highest Vulnerability Category of Proposed Use	Exception Test Required
AB26 – Garages, Tibbs Hill Road	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No
AB31 – Garages, Jacketts Field	0%	- >10% at risk from Surface Water Flooding in 1 in 30-yr, 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential	More Vulnerable (dwellings)	No
ACFS1 – Heath House	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No
ACFS10 – Andrews Ley Farm, Harefield Road	0%	- >10% at risk from Surface Water Flooding in 1 in 30-yr, 1 in 100-yr and 1 in 1000-yr event plus climate change - At risk of reservoir flooding	Residential	More Vulnerable (dwellings)	No
ACFS13b – Land at Hampermill Lane	0%	- >10% at risk from Surface Water Flooding in 1 in 30-yr, 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential	More Vulnerable (dwellings)	No
ACFS8b – Flower House, 2 – 3 Station Road	8.2%	- Within Flood Zone 3b plus climate change - >10% of site within highest risk category of groundwater flood	Residential	More Vulnerable (dwellings)	Yes
BR20 – Norhwick Day Centre, Northwick Road	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No
CFS14 – Land North of Oxhey Lane	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings, community space)	No
CFS20 – Land at Croxley Station, Watford Road, Croxley Green	0%	- >10% at risk from Surface Water Flooding in 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential	More Vulnerable (dwellings)	No

Site with SHELAA ref	% in Flood Zone (FZ2/3)	Highest Risk Elements on site	Proposed Land Use	Highest Vulnerability Category of Proposed Use	Exception Test Required
CFS32 – Land at Lynsters Farm, East of Uxbridge Road, Maple Cross	74%	- Within Flood Zone 3a plus climate change - >10% at risk from Surface Water Flooding in 1 in 100-yr and 1 in 1000-yr event plus climate change - >10% of site within highest risk category of groundwater flood - At risk of reservoir flooding	Employment	Less Vulnerable (Business, General Industry, Warehousing)	No
CFS36 – Land at Junction 17 of M25	0%	- At risk of reservoir flooding	Motorway Services	Less Vulnerable (Business)	No
CFS39b – Land to the East of Merchant Taylors School	0%	- At risk of reservoir flooding - >10% of site within highest risk category of groundwater flood	Education	More Vulnerable (Educational Establishment)	No
CFS55 – Land at Station Road, Kings Langley	30.8%	- Within Flood Zone 3b plus climate change - >10% at risk from Surface Water Flooding in 1 in 1000-yr event - >10% of site within highest risk category of groundwater flood - At risk of breach from canal flooding	Employment	Less Vulnerable (Offices, storage and distribution. retail)	Yes
CFS60 – Affinity Water Depot, Church Street	100%	- Within Flood Zone 3b plus climate change - >10% of site within highest risk category of groundwater flood - At risk of reservoir flooding - At risk of breach from canal flooding - Presence of watercourse within the site	Residential	More Vulnerable (dwellings)	Yes
CFS61 – Cinnamond House, Cassiobridge	1.2%	- Within Flood Zone 2 plus climate change - >10% at risk from Surface Water Flooding in 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential	More Vulnerable (dwellings)	No

Site with SHELAA ref	% in Flood Zone (FZ2/3)	Highest Risk Elements on site	Proposed Land Use	Highest Vulnerability Category of Proposed Use	Exception Test Required
		- At risk of breach from canal flooding			
CFS70 – Croxley Business Park, Hatters Lane	13.5%	- Within Flood Zone 3b plus climate change - >10% of site within highest risk category of groundwater flood - At risk of breach from canal flooding	Ancillary Space to Employment Site	Water-Compatible Development	Yes
CFS72 – Land off Solesbridge Lane	11.7%	- Within Flood Zone 3b plus climate change - At risk of reservoir flooding	Residential	More Vulnerable (dwellings)	Yes
CG47 – Garages off Grove Crescent	0%	- >10% at risk from Surface Water Flooding in 1 in 30-yr, 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential	More Vulnerable (dwellings)	No
CW9 – Garages, Copmans Wick	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event plus climate change - At risk of reservoir flooding	Residential	More Vulnerable (dwellings)	No
H15 – Garages rear of Drillyard, West Way	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No
H22a – Depot, Stockers Farm Road	26.3%	- Within Flood Zone 3a plus climate change - >10% at risk from Surface Water Flooding in 1 in 30-yr, 1 in 100-yr and 1 in 1000-yr event plus climate change - At risk of reservoir flooding	Residential	More Vulnerable (dwellings)	Yes
NCFS12 – Land East of Oxhey Lane	0.5%	- Within Flood Zone 3b	Residential with Specialist Housing	More Vulnerable (residential institutions, dwellings)	Yes

Site with SHELAA ref	% in Flood Zone (FZ2/3)	Highest Risk Elements on site	Proposed Land Use	Highest Vulnerability Category of Proposed Use	Exception Test Required
NCFS15 – Chorleywood Library	0%	- >10% at risk from Surface Water Flooding in 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential / Community (Library)	More Vulnerable (dwellings)	No
NCFS26 – Meresworth Care Home, Rickmansworth	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Care Home	More Vulnerable (residential institutions)	No
NCFS34 – Pinewood Lodge	0%	- >10% at risk from Surface Water Flooding in 1 in 30-yr, 1 in 100-yr and 1 in 1000-yr event plus climate change	Residential	More Vulnerable (dwellings)	No
NCFS35 – Land South of Chalfont Lane, West Hyde	40.7%	- Partly within Flood Zone 2 plus climate change - >10% of site within highest risk category of groundwater flood - At risk of reservoir flooding - Within the Historic Flooding Map	Employment	Less Vulnerable (business, storage and distribution. retail)	Yes
NCFS6 – Land to the East of Watford Road, Hunton Bridge	39.5%	- Partly within Flood Zone 2 plus climate change - >10% at risk from Surface Water Flooding in 1 in 1000-yr event - >10% of site within highest risk category of groundwater flood - At risk of breach from canal flooding	Residential, Solar Farm, Battery Storage, Recreation Facilities	Essential Infrastructure (utility infrastructure); More Vulnerable (dwellings)	No
NSS10 – Land at Mill Place, Watford Road	1.2%	- Partly within Flood Zone 3b plus climate change - >10% at risk from Surface Water Flooding in 1 in 1000-yr event - >10% of site within highest risk category of groundwater flood - At risk of breach from canal flooding	Residential	More Vulnerable (dwellings)	Yes

Site with SHELAA ref	% in Flood Zone (FZ2/3)	Highest Risk Elements on site	Proposed Land Use	Highest Vulnerability Category of Proposed Use	Exception Test Required
OSPF6 – Land west of Leavesden Aerodrome, Kings Langley	0%	- At risk of breach from canal flooding	Employment	Less Vulnerable (Leavesden Studio)	No
PCS2 – East Carpenders Park	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No
PCS47 – South of Little Oxhey Lane	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No
RW31 – Garage Land Off Uxbridge Road	0%	- >10% at risk from Surface Water Flooding in 1 in 1000-yr event	Residential	More Vulnerable (dwellings)	No

Exception Test

3.6. As mentioned in the Paragraphs 2.3 and 2.4, the exception test is applied when it is not possible to locate development in areas with a lower probability of flooding. In order to pass the exception test, it must be shown that the development will provide wider sustainability benefits that outweigh the risk, and that the development will be safe throughout its lifetime without increasing risk elsewhere.

3.7. Furthermore, as stated in the paragraph 3.1, the availability of suitable sites for development allocation in Three Rivers is limited due to various environmental constraints and planning matters. There are very few suitable and available brownfield sites in the district and these only meet a small proportion of the district's overall housing need. This means that the vast majority of the district's housing must be met by development in the Green Belt.

3.8. Supported by the council's Level 2 SFRA and the sequential test, eight sites are selected for assessment in the exception test to further examine the wider sustainability benefits to the community, as well as the flood safety of the site without increasing risk elsewhere. Table 5 shows the application of the exception test.

Table 5. Application of Exception Test

Site with SHELAA reference	Justifications	Has the Exception Test been passed?
ACFS8b – Flower House, 2 – 3 Station Road	<u>Wider Sustainability Benefits</u> It is anticipated that the site would provide 10 dwellings, which would positively contribute to the district's housing need. This will support the council in maintaining a deliverable housing supply over the plan period. The development of the site will also help deliver growth in the Kings Langley area. The council's Access to Services Study has concluded that the site has a sustainability rating of fair and the site is considered to be sustainably located. The site is in close proximity to Kings Langley Station and nearby bus stops and relatively close to Kings Langley High Street. The site is also in close proximity to allocated sites CFS26a and CFS26c, which will provide significant levels of on-site infrastructure, enhancing the sustainability of the site. It is noted that a portion of the site will be maintained for biodiversity net gain and green space. The allocation of the site will provide opportunities to enhance the site with green infrastructure, which will help deliver environmental improvements along with new development. Furthermore, it is noted that there are no alternative brownfield sites which are available, achievable and suitable for development. As stipulated in national policy, priority should be given to brownfield development.	Yes

	<u>Safety of Development Without Increasing Floor Risk Elsewhere</u> The site is shown to the at risk of fluvial flooding as the Mill Stream flows along the western border of the site and it is therefore within Flood Zone 3b. However, a vast majority of the site (91.8%) fall within Flood Zone 1. There will be no built development at the Flood Zone 3b and a 10-meter buffer area is required at the site between the Flood Zone 3b and future development. A site-specific flood risk assessment will be required as part of any future planning application. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
CFS55 – Land at Station Road, Kings Langley	<u>Wider Sustainability Benefits</u> It is anticipated that the site would contribute to the provision of employment floorspace through the development of offices, storage and distribution, and retail uses. This will support the council to maintain and improve economic performance of the district by providing employment opportunities. The development of the site will also help contribute to the growth of Kings Langley. The site is also in close proximity to transport infrastructure such as Kings Langley Railway Station and local bus stops, which will minimise car-based trips associated with future development. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> There will be no built development within Flood Zone 3b and a 8-meter buffer area is required between the River Gade and future development. A site-specific flood risk assessment will be required as part of any future planning application. Furthermore, a minimum 3m wide buffer is	Yes (The site was not allocated within the Local Plan for other planning reasons)

	to be maintained between the riverbank of the ordinary watercourse and the future development. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
CFS60 – Affinity Water Depot, Church Street	<u>Wider Sustainability Benefits</u> The site would positively contribute to the supply of housing in Three Rivers by providing 50 dwellings. The development of the site will also help deliver growth in Rickmansworth. The site is located within the Principal Town of Rickmansworth, which is considered a key location with community facilities, leisure sites and secondary schools situated in the vicinity. Rickmansworth's High Street and local open spaces are also within the walkable distance, which will reduce the need of car-based travel. The location of the site is therefore considered to be highly sustainable. The council's Access to Services Study has concluded that the site has a sustainability rating of good (the highest rating). The site is well connected to existing walking and cycling networks, which will further enhance the connectivity and support sustainable travelling modes. The northern portion of the site will be retained for water treatment and utility uses. This will allow the site to retain its original land use and continue to support the infrastructural capacity of the area. Furthermore, it is noted that the site is a previously developed site which is used for utility purposes. There are limited brownfield sites in the	Yes

	district and priority should be given to brownfield development, as set out in national policy. With good connections to services and its urban location, this site is considered suitable for development and this should outweigh the possible flood risks. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> Other than the prevailing water treatment and utility uses at the northern section of the site, there will be no built development within Flood Zone 3b. Residential development will be primarily delivered through the conversion of existing buildings, with potentially no residential uses at ground flood. A site-specific flood risk assessment will be required as part of any future planning application to ascertain the feasibility of ground floor accommodation and new buildings. A detailed site-specific hydraulic modelling will be required, building on the recent River Colne model and incorporating culvert and sluice blockage modelling, as well as groundwater monitoring, due to the shallow groundwater in the area. To ensure safe access and egress during the 1% AEP fluvial and surface water flood events, works outside of the boundary of the site may be required. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
CFS70 – Croxley Business Park, Hatters Lane	<u>Wider Sustainability Benefits</u> The site is an extension to the existing employment site allocation which will be used as ancillary amenity space. The proposed use of the site falls within the water-compatible development under the classification of flood risk vulnerability, which is considered compatible to the setting. The site is also located in a sustainable location.	Yes

	The allocation of the site will provide opportunities to enhance the site with green infrastructure, which will help to deliver environmental improvements along with new employment space. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> The site is predominantly located within Flood Zone 1 with small areas along the southern and eastern boundaries falling within Flood Zones 2 / 3. Built development (if any) will be restricted to Flood Zone 1 while public green space will be preserved in the area falling within Flood Zone 2 / 3. A site-specific flood risk assessment will be required as part of any future planning application. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
CFS72 – Land off Solesbridge Lane	<u>Wider Sustainability Benefits</u> The site would positively contribute to the supply of housing in Three Rivers by providing 14 dwellings. The development of the site will also help deliver growth in Chorleywood. The site is located at the edge of the Small Town of Chorleywood and following mitigation work required as part of development, pedestrian infrastructure adjoining the site will be improved, allowing better connectivity to the services and facilities in Chorleywood and nearby bus services Portions of the site will remain undeveloped for the buffer to the ordinary watercourse. This will provide opportunities to enhance the site with	Yes

	green infrastructure, which help deliver environmental improvements along with new development. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> Most of the site falls within Flood Zone 1 with a small portion of the site located within Flood Zones 2, 3a and 3b. Detailed modelling in the site-specific FRA is required to assess fluvial depth, velocity, and hazard, with the inclusion of an appropriate climate change uplift. Development should be directed away from the northeastern area of the site to prevent fluvial flood risk. A minimum 5 metre development buffer will be required from the ordinary watercourse. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
H22a – Depot, Stockers Farm Road	<u>Wider Sustainability Benefits</u> The site would positively contribute to the supply of housing in Three Rivers by providing 40 dwellings. The development of the site will also help deliver growth in Rickmansworth. The site is partly located within the Principal Town of Rickmansworth. Bus stops are located in close proximity to the site, as is a large supermarket. The facilities and services of Rickmansworth are in relatively close proximity. This will help reduce the need of car-based travelling modes for the future residents. The site is also close to an existing walking and cycling network, which will further enhance the connectivity and support sustainable travelling modes.	Yes

	Furthermore, it is noted that there are no alternative brownfield sites which are available, achievable and suitable for development. As stipulated in national policy, priority should be given to brownfield development. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> It is noted that a large portion of the site falls within Flood Zone 1 while about 26% of the site is identified as being located in Flood Zones 2 / 3. A Flood Warning and Evacuation Plan and a site-specific Flood Risk Assessment will be prepared at the planning application stage. A carefully considered and integrated flood resilient and sustainable drainage design will be included as part of any future development on the site. Future development at the site will steer away from the area identified to be at highest risk of surface water flooding within the site. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
NCFS35 – Land South of Chalfont Lane, West Hyde	<u>Wider Sustainability Benefits</u> This site is considered to not be sustainable. Whilst the site is located close to a limited bus route and there are good vehicular connections, it is considered that the site is not located in a sustainable location. West Hyde, the nearest settlement, adjoins the eastern side of the northern parcel and is categorised as a "Green Belt Hamlet" in the settlement hierarchy. The closest relatively sustainable settlement is Maple Cross, which is a large in the settlement hierarchy, but the built up area boundary of Maple Cross is around 800m to the north of the site, making the site unsustainable	No

	Therefore, this site does not pass the exception test. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> The southern section of the site is shown to be at high risk of fluvial flooding as it is located in Flood Zone 3b. A Flood Warning a|nd Evacuation Plan should be submitted in the planning application. A carefully considered and integrated flood resilient and sustainable drainage design will be included as part of any future development of the site. A minimum 3m wide buffer area should be maintained between riverbank and future development. Given the above mitigation, development may be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
NSS10 – Land at Mill Place, Watford Road	<u>Wider Sustainability Benefits</u> It is anticipated that the site would provide 10 dwellings, which would positively contribute to the district's housing need. This will support the council in maintaining a deliverable housing supply over the plan period. The development of the site will also help deliver growth in the Hunton Bridge area. The site is in relatively close proximity to Hunton Bridge which has some services and facilities. The site is also close to existing walking and cycling networks along the Grand Union Canal, which supports sustainable travelling modes. Furthermore, it is noted that there are no alternative brownfield sites which are available, achievable and suitable for development.	Yes

	Prioritising brownfield land such as this site is a priority, as set out in national policy. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> A small proportion of the site is located within Flood Zone 3b. A site-specific Flood Risk Assessment is required at the planning application stage. As the site is located in a historic landfill site, a thorough ground investigation will be required as part of the drainage strategy. A carefully considered and integrated flood resilient and sustainable drainage design will be put forward in the future development in the site. A 10-meter buffer area is required between future development and the River Gade to the east of the site. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
NCFS12 – Land East of Oxhey Lane	<u>Wider Sustainability Benefits</u> The site is considered to be a large site which can accommodate large scale development. It is anticipated that the site would provide 381 new dwellings in Three Rivers, which would represent a significant contribution to the district's housing need. This will support the council in maintaining a deliverable housing supply over the plan period. The development of the site will also help deliver the growth in the Carpenders Park area. It is noted that the site will provide specialist housing including a C2 use class children's care home (4-bedroom) and C2 use class extra-care housing (60 units). This would allow the site to provide a significant contribution to the district's specialist housing needs.	Yes

	Despite the site's location at the edge of Carpenders Park, the location of the site is considered sustainable. The council's Access to Services Study has concluded that the site has a sustainability rating of fair. Whilst the site is connected with existing walking and cycling networks, development of the site will require improvement and enhancement works, which will enhance the connectivity and sustainability of the site and support sustainable travelling modes. The site will also provide open space and green infrastructure, which will help deliver environmental improvements. <u>Safety of Development Without Increasing Floor Risk Elsewhere</u> It is noted that majority of the site is in Flood Zone 1 while only a minor strip at the southern portion of the site falls within Flood Zone 3b. Although the Flood Zone 3b area is minor, it is recommended that no development should be built in the area and it should be preserved as public green space. A site-specific Flood Risk Assessment with detailed modelling on assessing the potential blockage to the culvert sections of Oxhey Stream is required at the planning application stage. A drainage strategy should also be prepared to address how site drainage will mitigate the impacts of the existing surface water flow paths generated within the site boundary on the wider area. Consultation with HCC LLFA will also be required and a carefully considered flood resilient and sustainable drainage design should be put forward in the future development. Given the above mitigation, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	

4. CONCLUSION

4.1. In accordance with national regulations and guidelines, the council has applied sequential tests and exception tests to inform the allocation of land in the Local Plan. All the sites passed the sequential and exception test, except for site NCFS35 (Land South of Chalfont Lane, West Hyde), due to lack of sustainability benefits. Among 36 assessed sites, 34 sites are being taken forward for allocation in Local Plan, while one site has been removed from the Local Plan process.

4.2. The council considers that the sites taken forward for allocation provide the most appropriate way of utilising land available in Three Rivers, in accordance with the identified flood risk status, while considering the wider sustainability benefits to the community and that development can be made safe throughout its lifetime, without increasing flood risk elsewhere.