



CASTLE POINT PLAN 2026 TO 2043

Sequential test note

September 2026



Contents

1. Introduction.....	3
2. Compliance with National Policy.....	3
3. Sequential and Exception Tests.....	4
4. Sustainability Appraisal	6
5. Conclusion	7
Appendix 1 – Sequential and Exceptions Test - Excel Spreadsheet	8
Appendix 2 – Site ID Reference List.....	9

1. Introduction

- 1.1 This note is to address how the Castle Point Plan has satisfied the National Planning Policy Framework December 2024 (NPPF) and Planning Practice Guidance (PPG) requirements relating to the Sequential Test and Exception Test through its use of flood risk evidence to inform site selection and how the sequential test and flood risk assessment has informed the Sustainability Appraisal (SA).
- 1.2 The Sequential and Exception Tests for Housing Site Options document dated January 2026 [\[4.37\]](#) was produced by the council to provide an informative document that was user-friendly to reflect the work undertaken by flood risk consultants AECOM, which had been previously provided to the council in Microsoft Excel Format (Appendix 1).
- 1.3 While the Sequential and Exception Tests for Housing Site Options document was produced in January 2026, the data was received by the Council on the 21 February 2025 and was used to inform decision making from that date, as well as the Sustainability Appraisal [\[1.16, 1.17, 1.18\]](#) which was completed in July 2025.

2. Compliance with National Policy

- 2.1 Paragraph 174 of the National Planning Policy Framework December 2024 (NPPF) requires strategic policies to be informed by a strategic flood risk assessment and to manage flood risk from all sources, taking account of the impacts of climate change. Paragraph 175 requires the application of the Sequential Test in areas known to be at risk from any form of flooding, whilst paragraph 176 sets out the circumstances in which the Exception Test is required. Together, these provisions establish the sequential, risk-based approach to plan-making and site allocation
- 2.2 The accompanying Planning Practice Guidance (PPG) on Flood Risk and Coastal Change explains how the Sequential Test and Exception Test should be applied during plan-making. The PPG advises that local planning authorities should consider all sources of flood risk, assess reasonably available alternative sites and apply a sequential approach when identifying suitable locations for development.

3. Sequential and Exception Tests

- 3.1 The Sequential Test was undertaken alongside the preparation of the Level 1 Strategic Flood Risk Assessment and comprised a spreadsheet appraising all sites promoted to the Council for consideration. This is provided at Appendix 1 and was received by the Council in February 2025.
- 3.2 The Sequential Test did not operate independently from the wider plan making process, rather its findings informed consideration of site options alongside the evidence generated through the Strategic Land Availability Assessment (SLAA) [[10.11](#), [10.12](#), [10.13](#)] and the SA [[1.16](#), [1.17](#), [1.18](#) and [13.03](#)].
- 3.3 This document was prepared to support compliance with paragraphs 174 to 176 of the NPPF, which require local planning authorities to direct development towards areas of lower flood risk wherever reasonably possible and to apply the Exception test where development is necessary in higher risk locations.
- 3.4 The Level 2 Strategic Flood Risk Assessment (SFRA L2) [[4.11](#), [4.12](#)] provides evidence that satisfied CPBC that sites are safe or can be made safe when developed in accordance with policies SD1 – Tidal Flood Risk Management and SD2 – Non-Tidal Flood Risk Management within the Castle Point Plan (CPP) [[1.01](#)]. This conclusion is supported by the Environment Agency in the Statement of Common Ground [[12.08](#)] and within their Regulation 19 consultation response [[0823](#)].
- 3.5 The Environment Agency raised the introduction of the New National Flood Risk Assessment (NaFRA2) in their response to the Regulation 19 consultation [[0823](#)] and highlighted that the flood extents at two site allocations had changed as a result of the NaFRA2 modelling.
- 3.6 Consequently the SFRA was updated to take account of the NaFRA2, as set out in the Level 2 SFRA Update [[4.13](#)].
- 3.7 The spreadsheet attached at Appendix 1, column K, entitled “Initial DRAFT ranking” scores the sites between 1 and 13, where 13 represents the most favourable score and 1 represents the least favourable. This reflects how the sites were sequentially ranked on the basis of the information within the table.
- 3.8 As all sites promoted to the Council, for all uses, have been considered within this spreadsheet, this needs to be read alongside the tables set out in Appendix 2 which identify the early site reference number in “column B”.

- 3.9 For the West Canvey (C4) broad location, this is considered in detail within the Level 2 SFRA.
- 3.10 Paragraph 174 of the NPPF states that “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”.
- 3.11 Paragraph 147 of the NPPF states that “before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”
- 3.12 Throughout, CPBC has ensured that flood risk formed a key component of site selection whilst recognising that allocations must also be assessed against broader social, economic and environmental objectives in accordance with paragraph 174 of the NPPF.

4. Sustainability Appraisal

- 4.1 The SA [[1.16](#), [1.17](#), [1.18](#) and [13.03](#)] incorporates flood risk as a fundamental component of the assessment framework.
- 4.2 Objective 8 of the SA, *“To adapt and respond to reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change”*, has been set to address the requirements set out in the NPPF and PPG.
- 4.3 The assessment criteria supporting this objective require consideration of whether proposals:
- Avoid areas at risk of flooding
 - Avoid increasing flood risk elsewhere
 - Take account of climate change impacts
 - Manage and mitigate flood risk appropriately
 - Incorporate adaptation measures and
 - Apply the sequential test appropriately.
- 4.4 The SA Framework (Sites Content) for objective 8 includes the following criteria:
- Surface Water Flooding
 - Is the site at risk from tidal or fluvial flooding?
 - Is the site located within 19m of sea defences?
 - Relationship to Critical Drainage Areas
- 4.5 The SA therefore directly reflects the principles underpinning the Sequential Test and the wider flood risk policy framework.
- 4.6 This ensured that flood risk considerations were systematically assessed across sites, policies and strategic growth options throughout preparation of the Castle Point Plan.

5. Conclusion

- 5.1 The Council has satisfied the NPPF and PPG requirements relating to the Sequential Test by undertaking a comprehensive Sequential and Exceptions Test Review informed by the SFRA, national flood risk guidance, flood zone mapping, climate change evidence and consideration of reasonable alternative sites.
- 5.2 The findings of the flood risk assessment informed the site selection process and were embedded within the Sustainability Appraisal framework through the dedicated flood risk objective and assessment criteria.
- 5.3 The Sustainability Appraisal then provided the evidence required for the first limb of the Exception Test by assessing the wider sustainability benefits associated with sites and policies.
- 5.4 As a result, the Sequential Test Review and Sustainability Appraisal should be read as complementary and mutually supporting evidence base documents that together demonstrate a robust and policy-compliant approach to flood risk and site selection in the Castle Point Plan.

Appendix 1 – Sequential and Exceptions Test - Excel Spreadsheet

See separate document.

Appendix 2 – Site ID Reference List

Castle Point Plan – Allocations

Early Site ID (Column 2)	SA/SLAA Site ID	Site Name	Policy/Allocation Number
ADD012a	40512	Furniture Kingdom, London Road	B3
40081	40510	Canvey Supply, London Road, Benfleet	B5
ADD018	40509	159-169 Church Road	B6
40120	40511	Richmond Avenue Car Park	B7a
40155	40513	L/a Villa Park, Tarmarisk	B7B
40014	40514	312-320 London Rd (Queen Bee's)	B7c
ADD031	40220	Manor Trading Estate	B8
ADD043a	40233	Land on the corner of Furtherwick Road and Waarden Road	C1
ADD044a	40529	Kushi, 59 Furtherwick Rd	C1
ADD042a	40531	Canvey Library + Barclays	C1
40123	40526	Oak Road Car Park	C1
40112	40537	L/a The Paddocks	C1
CP0005	40538	Canvey Job Centre, Furtherwick Road	C1
40115	40532	Knightswick Shopping Centre	C1
19981	40524	Land at The Point	C9
40082	40539	Former Admiral Jellicoe, High Street	C10A
40125	40534	Land to the rear of North Avenue	C10B
ADD060	40525	Essex Coachworks, 218 High Street	C10C
38042	40535	Former Council Offices, Long Rd	C10D
40134	40536	Corner of Little Gypps Rd & Willow Cl	C10E
40129	40541	Ozonias Gardens, Eastern Esplanade	C10F
40130	40540	Land between Station Rd & Seaview rd	C10G
40118	40520	Castle Lane Car Park	Had1
CP0012	40522	The Island Site, High St / London Rd	Had1
39985	40523	Johnsons Factory, London Road	Had1
ADD007c	40518	Hadleigh Clinic, 49 London Road	Had3
40034	40519	Land South of Scrub Lane	Had4
ADD035	40515	USP College, Kiln Road	Thun2
ADD080	40516	Council Offices, Kiln Road	Thun2
ADD036	40507	Thundersley Clinic, Kenneth Road.	Thun3a
CP0033	40517	Thames Loose Leaf, 289 Kiln Road	Thun3b

Green Belt Sites

Site Name	GB Reference Number	SA/SLAA Site ID
West of Canvey Road	GB1	40505
East of Canvey Road	GB2	40504
South of Charfleets	GB3	40506
Land off Glebelands	GB4	40168
West of Benfleet (Jotmans)	GB5	40496
Land between Felstead Road and Catherine Road	GB6	40497
South of Hadleigh	GB8 & GB8a	40503
Oak Tree Farm, Poors Lane	GB9	40107
South-East of Daws Heath	GB10	40500
South-West of Daws Heath	GB11	40499
The Chase	GB12	40498
East of Rayleigh Road	GB13	40492
Land south of Daws Heath Road	GB14	40101
Land North of Grasmere Road	GB15	40494
North-West Thundersley	GB16	40543
Land south of Grange	GB17	40372
Land off Grange		40373
Land adjacent to Summerhill, Goldfinch Lane	GB18	39911
Land between Ashdown and Goldfinch Lodge, Goldfinch Lane		40030
Land north east of Chesterfield Avenue and Downer Road North	GB19	40445
Land between Downer Road North, Chesterfield Avenue and Thundersley Park Road		40051
Land north of Thundersley Church Road and east of Rhoda Road North		40075
Land to east of St Michael's Road	GB20	40451
Land north of Eastwood Old Road		40046
Land off Eastwood Old Road		40370
Land north of Pound Wood Nature Reserve		40371
Hilltop Farm, Hilltop Avenue	GB21	40354
High Warren Farm, Hilltop Farm		40171
N/A		40083
Land adjacent 230 Vicarage Hill and land to rear, Vicarage Hill and Essex Way	GB22	40086
Land between Essex Way and Vicarage Hill		40087
Land to rear of 329 Benfleet Road	GB23	40090
Land adjacent 230 Vicarage Hill and land to rear, Vicarage Hill and Essex Way		40029
231 Benfleet Road	GB24	39955
Brambles off Shipwrights Close		40078
Land to rear of Beaucroft and Sunray, Bassenthwaite Road	GB25	40387
N/a	GB26	40111
Land adjacent 298 Church Road	GB27	40349
170 Bramble Road	GB28	40397

Site Name	GB Reference Number	SA/SLAA Site ID
Ragwood Riding Centre, Daws Heath Road	GB29	40441
Land off Netherfield	GB30	40362
Glyders Meadow	GB31	40041
Land south of Fleet Roundabout, Roscommon Way	GB32	39933
Land west of Kingsley Lane	GB33	40170
Grandview Stables, Grandview Road	GB34	40470
East of Manor Trading Estate, Church Road	N3	40460