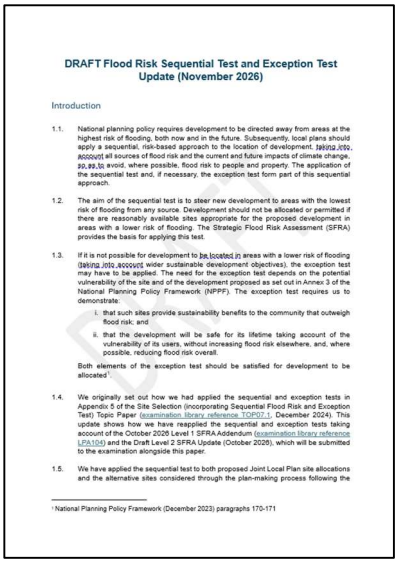
Cover note for the:

DRAFT Flood Risk Sequential Test and Exception Test Update (November 2026)



DRAFT Flood Risk Sequential Test and Exception Test Update (November 2026)

Introduction

1.1. National planning policy requires development to be directed away from areas at the highest risk of flooding, both now and in the future. Subsequently, local 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. The application of the sequential test and, if necessary, the exception test form part of this sequential approach.

1.2. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The Strategic Flood Risk Assessment (SFRA) provides the basis for applying this test.

1.3. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test depends on the potential vulnerability of the site and of the development proposed as set out in Annex 3 of the National Planning Policy Framework (NPPF). The exception test requires us to demonstrate:

i. that such sites provide sustainability benefits to the community that outweigh flood risk; and

ii. that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

Both elements of the exception test should be satisfied for development to be allocated.

1.4. We originally set out how we had applied the sequential and exception tests in Appendix 5 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1, December 2024). This update shows how we have reapplied the sequential and exception tests taking account of the October 2026 Level 1 SFRA Addendum (examination library reference LPA104) and the Draft Level 2 SFRA Update (October 2026), which will be submitted to the examination alongside this paper.

1.5. We have applied the sequential test to both proposed Joint Local Plan site allocations and the alternative sites considered through the plan-making process following the

[1] National Planning Policy Framework (December 2023) paragraphs 170-171

National planning policy states that local plans should apply a sequential, risk-based approach to the location of development. The application of the sequential test and, if necessary, the exception test form part of this sequential approach.

We originally set out how we had applied the sequential and exception tests in Appendix 5 of our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1, December 2024).

This draft update shows how we have reapplied the sequential and exception tests taking account of the October 2026 Level 1 SFRA Addendum (examination library reference LPA104) and the Draft Level 2 SFRA Update (October 2026), which will be submitted to the examination alongside this paper.

We are submitting this Draft Flood Risk Sequential Test and Exception Test Update to the examination to assist with discussions at the stage three hearing sessions. It should be noted that the Sequential Test has been applied using our final published Level 1 SFRA (examination library references CEQ11 and CEQ11.1) and Level 1 SFRA Addendum (examination library reference LPA104). The Exception Test is also informed by our Draft Level 2 SFRA Update (October 2026), which is pending Environment Agency and Lead Local Flood Authority review.

In summary, we have reapplied the sequential test and exception test using the latest flood risk data and the proposed site allocations remain justified on this basis.

DRAFT Flood Risk Sequential Test and Exception Test Update (November 2026)

Introduction

1.1. National planning policy requires development to be directed away from areas at the highest risk of flooding, both now and in the future. Subsequently, local 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. The application of the sequential test and, if necessary, the exception test form part of this sequential approach.

1.2. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The Strategic Flood Risk Assessment (SFRA) provides the basis for applying this test.

1.3. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test depends on the potential vulnerability of the site and of the development proposed as set out in Annex 3 of the National Planning Policy Framework (NPPF). The exception test requires us to demonstrate:

i. that such sites provide sustainability benefits to the community that outweigh flood risk; and

ii. that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

Both elements of the exception test should be satisfied for development to be allocated[1].

1.4. We originally set out how we had applied the sequential and exception tests in Appendix 5 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1, December 2024). This update shows how we have reapplied the sequential and exception tests taking account of the October 2026 Level 1 SFRA Addendum (examination library reference LPA104) and the Draft Level 2 SFRA Update (October 2026), which will be submitted to the examination alongside this paper.

1.5. We have applied the sequential test to both proposed Joint Local Plan site allocations and the alternative sites considered through the plan-making process following the

[1] National Planning Policy Framework (December 2023) paragraphs 170-171

multi-staged process set out in Planning Practice Guidance (PPG)[2]. The proposed Joint Local Plan site allocations have site references beginning with either AS (site allocations found in chapter 8 of the plan) or JT1 (employment allocations found in Policy JT1 of the plan). The alternative sites considered have site references beginning either SH (sites from the South Oxfordshire Housing and Economic Land Available Assessment) or VH (sites from the Vale of White Horse Housing and Economic Land Available Assessment).

Sequential Test

Step 1: Identify sites at the lowest risk of flooding

1.6. The first step in the sequential test is to identify sites at the lowest risk of flooding. We have used the following information from our Level 1 SFRA (examination library references CEQ11 and CEQ11.1) and Level 1 SFRA Addendum (examination library reference LPA104) to determine which sites are considered to be at "low flood risk":

Table 1: Lowest level / frequency of flood risk

Source of flood risk	Level / frequency of flood risk
Fluvial (flooding from rivers)	Less than a 1 in 1,000 year flood event (known as Flood Zone 1).
Surface water	Between a 1 in 100 year and 1 in 1,000 year flood event.
Groundwater	N/A - Our Level 1 SFRA maps the risk of groundwater emergence within the districts, rather than the relative risk of groundwater flooding. The available data does not provide the confidence or certainty required to undertake the sequential test, therefore this source of flood risk has not been considered. (See section 1.2.2 of Appendix C of our Level 1 SFRA Addendum (examination library reference LPA104 for further information.)
Reservoirs	N/A - Our Level 1 SFRA states that the Environment Agency Reservoir Flood Map does not describe a risk-based scenario and therefore the available data is inappropriate to be used alongside risk mapping from other sources in the sequential test. (See section 1.2.3 of Appendix C of our Level 1 SFRA Addendum (examination library reference LPA104 for further information.)
Climate change modelling	N/A - Sites located in areas of lowest risk are not impacted by this scenario, as it considers an increase of risk based on areas with the highest risk of fluvial and surface water flooding.

[2] Planning Practice Guidance, 'Flood risk and coastal change'. Paragraph: 026 Reference ID: 7-026-20220825 Diagram 2 Application of the Sequential Test for plan preparation

1.7. We applied these criteria to the proposed Joint Local Plan site allocations and the alternative sites considered through the plan-making process. There were no sites entirely within areas of the lowest risk of flooding. It is therefore not possible for us to direct development towards areas of lowest flood risk. Consequently, we have considered sites at a higher risk flooding following the staged process set out in the PPG.

Step 2: Identify sites at medium risk of flooding

1.8. The next step in the sequential test is to identify sites with no greater than a medium risk of flooding. We used the following information from our Level 1 SFRA (examination library references CEQ11 and CEQ11.1) and Level 1 SFRA Addendum (examination library reference LPA104) to determine which sites are considered to be at "medium flood risk":

Table 2: Medium level / frequency of flood risk

Source of flood risk	Level / frequency of flood risk
Fluvial (flooding from rivers)	Between a 1 in 100 year and 1 in 1,000 year flood event (known as Flood Zone 2).
Surface water	Between a 1 in 30 year and 1 in 100 year flood event.
Groundwater	N/A - Our Level 1 SFRA maps the risk of groundwater emergence within the districts, rather than the relative risk of groundwater flooding. The available data does not provide the confidence or certainty required to undertake the sequential test, therefore this source of flood risk has not been considered. (See section 1.2.2 of Appendix C of our Level 1 SFRA Addendum (examination library reference LPA104 for further information.)
Reservoirs	N/A - Our Level 1 SFRA states that the Environment Agency Reservoir Flood Map does not describe a risk-based scenario and therefore the available data is inappropriate to be used alongside risk mapping from other sources in the sequential test. (See section 1.2.3 of Appendix C of our Level 1 SFRA Addendum (examination library reference LPA104 for further information.)
Climate change modelling	The additional risk from climate change on surface water flood risk uses the low risk extent as a precautionary proxy for the medium risk plus climate change extent. Sites located in areas of medium risk of fluvial flooding are not impacted by this scenario, as it considers an increase of risk based on areas with the highest risk of fluvial flooding.

1.9. We applied these criteria to the proposed Joint Local Plan site allocations and the alternative sites considered through the plan-making process. We have identified no sites as having a no higher than medium risk of flooding. It is therefore not possible for us to direct development towards areas of medium flood risk. Consequently, we have considered sites at a higher risk flooding following the staged process set out in the PPG.

Stage 3: Identify sites at high risk of flooding

1.10. The next step in the sequential test is to consider sites with a high risk of flooding. All the proposed Joint Local Plan site allocations and the alternative sites considered through the plan-making process have been identified as containing areas at high risk of flooding. We used the following information from our Level 1 SFRA (examination library references CEQ11 and CEQ11.1) and Level 1 SFRA Addendum (examination library reference LPA104) to determine which sites are considered to be at "high flood risk":

Table 3: High level / frequency of flood risk

Source of flood risk	Level / frequency of flood risk
Fluvial (flooding from rivers)	Greater than a 1 in 100 year flood event (known as Flood Zone 3).
Surface water	Greater than a 1 in 30 year flood event.
Groundwater	N/A - Our Level 1 Strategic Flood Risk Assessment notes that the potential impact from groundwater flooding. However, because the available data does not provide the confidence or certainty required to undertake the sequential test this source of flood risk has not be considered within the sequential test (see appendix C of our Level 1 SFRA Addendum (examination library reference LPA104) for more details).
Reservoirs	N/A - Our Level 1 Strategic Flood Risk Assessment notes that the potential impact from reservoir flooding cannot be categorised as high, medium or low risk. It is therefore not considered within the sequential test (see appendix C of our Level 1 SFRA Addendum (examination library reference LPA104) for more details).
Climate change modelling	• Modelled undefended 1% Annual Exceedance Probability (AEP) fluvial event + climate change (additional risk) • Flood Zones + climate change (additional risk) • Future functional floodplain (additional risk) • Flood Map for Planning Surface Water Flood Risk 1% AEP plus 2070s Upper End Climate Change (additional risk)

1.11. The PPG then expects us to rank sites within this category in 'flood risk preference'. The proportion of each site within Flood Zone 3b has been used as the starting point, as this is considered to represent the greatest risk of flooding currently. It was also the basis of undertaking the sequential test prior to changes to paragraph 168 of the NPPF[3], which previously only required consideration of river and sea flood risk when applying the sequential test. Where no part of a site is located within Flood Zone 3b, we have used the proportion of the site within Flood Zone 3a to rank those sites. Where no part of the site is located within Flood Zone 3 (a or b), the proportion of the site currently at high risk of surface water flooding is used to rank the sites. The full assessment of potential sources of flooding is set out in Appendix B of our Level 1 SFRA Addendum (examination library reference LPA104).

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[3] National Planning Policy Framework – 2021

Table 4: Sites located within areas of high flood risk, ranked by flood risk.

Site Reference	Site Name	Proposed / Promoted Use	Area (ha)	Consideration 1: Proportion of the site within FZ3b (%)	Consideration 2: Proportion of the site within FZ3a (%)	Consideration 3: Proportion of the site at high risk of surface water flooding (%)	Proportion of the site within future functional floodplain (additional risk)	Proportion of site within Modelled undefended 1% AEP fluvial event + climate change (additional risk)
VH381	Land adjacent to Peewit Farm, 95 Drayton Road, Drayton	Residential	3.760	0.000	0.000	0.000	0.000	0.027
VH376	Land at Old Mill Nurseries, Upper Green, Stanford-in-the-Vale	Residential	3.180	0.000	0.000	0.018	0.000	0.000
SH692	South Fleet	Residential	33.490	0.000	0.000	0.195	0.000	0.000
AS12	Harwell Campus	Employment	282.260	0.000	0.000	0.263	0.000	0.000
AS1	Land at Berinsfield Garden Village	Mixed	132.520	0.000	0.000	0.490	0.000	0.000
VH128	Kingston Bagpuize House	Residential	7.620	0.000	0.000	0.531	0.000	0.000

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Site Reference	Site Name	Proposed / Promoted Use	Area (ha)	Consideration 1: Proportion of the site within FZ3b (%)	Consideration 2: Proportion of the site within FZ3a (%)	Consideration 3: Proportion of the site at high risk of surface water flooding (%)	Proportion of the site within future functional floodplain (additional risk)	Proportion of site within Modelled undefended 1% AEP fluvial event + climate change (additional risk)
AS15	Harcourt Hill Campus	Educational & Leisure	22.740	0.000	0.000	0.614	0.000	0.000
SH628	Richmead Park	Residential	60.310	0.000	0.000	0.618	0.000	0.000
SH816	Land southeast of Moorend Lane, Thame, OX9 3JL	Residential	30.950	0.000	0.000	0.807	0.000	0.000
AS16	Vauxhall Barracks, Didcot	Mixed	9.870	0.000	0.000	0.827	0.000	0.000
SH830	Land to the North of the A329 at Cholsey	Residential	33.270	0.000	0.000	0.921	0.000	0.000
SH602	Land north of Wallingford	Residential	21.470	0.000	0.000	1.007	0.000	0.000
SH609	Land at Cholsey Fields, Cholsey	Residential	28.440	0.000	0.000	1.232	0.000	0.000

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VH139	Land at Crown Packaging, Wantage	Residential	7.020	0.000	0.000	1.431	0.000	0.000
JT1i	Former Esso Research Centre	Employment	11.020	0.000	0.000	1.940	0.000	0.000
JT1d	Hithercroft Industrial Estate, Wallingford	Employment	0.570	0.000	0.000	1.950	0.000	0.000
VH267	Land at The Croft and Little Croft, Milton Heights	Residential	3.250	0.000	0.000	1.987	0.000	0.000
VH310	Land north of Reading Road and Grove Road, Harwell OX11 0HT	Residential	35.440	0.000	0.000	2.250	0.000	0.000
VH314	Haynes of Challow, Roadside Farm	Residential	3.520	0.000	0.000	2.797	0.000	0.000

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SH787	Land Off Wantage Road	Mixed	77.960	0.000	0.000	2.866	0.000	0.000
VH703	Shrivenham Hundred Business Park	Employment	5.340	0.000	0.000	2.868	0.000	0.000
VH627	Land north east of Watchfield, Majors Road, Watchfield	Residential	51.570	0.000	0.000	3.371	0.000	0.000
SH605	Land off Wantage Road, Wallingford	Residential	55.040	0.000	0.000	3.623	0.000	0.000
AS6	Rich's Sidings and Broadway, Didcot	Mixed	2.960	0.000	0.000	3.766	0.000	0.000
JT1b	Grove Technology Park	Employment	13.220	0.000	0.000	4.255	0.000	0.000
AS11	Culham Campus	Employment	77.350	0.000	0.000	4.325	0.000	0.000

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VH399	Tulwick Park, Grove	Residential	47.950	0.000	0.000	4.493	0.000	0.000
VH685	Abbey Shopping Centre and the Charter	Employment	2.510	0.000	0.000	4.557	0.000	0.000
JT1k	South of Park Road, Faringdon	Employment	3.700	0.000	0.000	5.013	0.000	0.000
SH574	Former South Oxfordshire District Council offices, Crowmarsh Gifford	Mixed	2.780	0.000	0.000	5.797	0.000	0.004
VH400	Land south of Shrivenham	Residential	31.630	0.000	0.000	6.291	0.000	0.000
AS7	Didcot Gateway, Didcot	Mixed	4.340	0.000	0.000	7.738	0.000	0.000

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AS8	North West of Grove, Grove	Residential	28.370	0.000	0.000	7.952	0.000	0.000
VH235	Land at The Potting Shed Nursery, Longworth	Residential	5.130	0.000	0.000	8.201	0.000	0.000
SH649	Blackditch Farm	Residential	25.810	0.000	0.000	9.285	0.000	0.000
JT1e	Monument Business Park, Chalgrove	Employment	2.250	0.000	0.000	20.918	0.000	0.000
VH560	Land South of Majors Road, Watchfield, SN7 7TR, Majors Road, Watchfield, SN7 7TR	Residential	33.200	0.000	0.000	22.919	0.000	0.000
VH715	Drayton Road Industrial Estate	Employment	1.210	0.000	24.395	2.836	22.035	34.842

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AS3	Land South of Grenoble Road, Edge of Oxford	Mixed	136.110	0.057	4.116	7.644	3.988	0.000
AS10	Land at Dalton Barracks Garden Village, Shippon	Mixed	145.520	0.168	0.020	1.610	0.014	0.000
SH685	Land southwest of Chinnor	Residential	51.290	0.254	0.043	0.046	0.044	0.000
VH288	Land to the south of East Hanney	Residential	43.530	0.507	0.024	1.886	0.022	0.088
VH606	Land north of Crab Hill, Grove, Wantage	Residential	191.980	0.515	0.175	1.116	0.152	0.000
VH657	Land West of Wantage, North East of East Challow, Wantage/East Challow	Residential	78.740	0.719	0.359	1.874	0.194	0.000

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VH403	Land east of Hendred	Residential	124.670	0.820	0.045	0.783	0.044	0.059
VH694	Barton Mill in Audlett Drive, Abingdon	Employment	1.530	0.842	1.564	6.008	2.251	2.386
VH729	Land west of Grove Business Park	Employment	7.430	1.046	1.407	1.449	1.218	0.000
JT1f	Abingdon Science Park	Employment	16.720	1.573	1.410	2.322	2.329	5.500
VH708	Abingdon Science Park at Barton Lane	Employment	13.180	1.954	1.394	2.867	2.630	6.978
SH668	Chalgrove Airfield	Residential	444.320	1.964	0.065	4.417	0.072	0.000
VH544	Land North of the A420 at Shrivenham, Sandhill Farm, Shrivenham, SN6 8BH	Residential	221.000	2.058	0.135	2.327	0.161	0.000

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JT1a	Southmead Industrial Estate, Didcot	Employment	2.640	3.703	0.000	3.279	0.000	0.000
VH404	Land north of Grove	Residential	409.280	4.344	0.251	2.562	0.182	0.707
SH811	Land south west of Thame (Highfields)	Residential	40.270	5.455	0.645	4.367	0.864	0.000
VH656	Shrivenham Park Golf Club, Pennyhooks Lane, Shrivenham, SN6 8EX	Residential	28.720	6.318	0.442	0.326	0.424	0.000
VH590	Land at South Abingdon, Drayton road, Abingdon	Residential	87.990	7.135	0.851	4.874	0.091	0.383
VH290	Grove Road, Wantage OX12 7BZ	Residential	3.640	7.157	0.012	3.985	0.006	0.000
VH611	Land to the North of Grove and to the East	Residential	333.080	7.770	0.931	3.589	0.793	0.382

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	and West of the A338 Wider Opportunity, n/a, Grove, n/a							
AS2	Land adjacent to Culham Campus	Mixed	217.430	9.103	1.131	1.281	1.201	1.100
AS5	Land at Bayswater Brook, Edge of Oxford	Residential	105.080	10.315	1.021	1.781	0.474	0.000
VH541	Land at Drayton East Way and Land South of Drayton Road	Residential	37.530	10.620	1.808	0.029	1.798	0.142
AS4	Land at Northfield, Edge of Oxford	Residential	68.050	11.467	3.328	3.333	3.288	0.000
AS9	North West of Valley Park, Didcot	Residential	33.280	13.794	0.034	3.795	0.024	0.000

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VH386	Land to the South of Marcham	Residential	47.290	17.826	3.294	0.322	2.667	3.122

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Exception test

1.12. The exception test is a two-part process that requires preparation of evidence to demonstrate that:

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. (Thus it is a requirement to demonstrate that proposed development will be safe under climate change conditions.)

Both elements of the exception test should be satisfied for development to be allocated or permitted.

1.13. The exception test is required if development is:

- Highly vulnerable* and in Flood Zone 2
- More vulnerable* and in Flood Zone 3a
- Essential infrastructure and in areas of Flood Zone 3a or 3b

*The vulnerability of development is set out in Annex 3 of the NPPF[4].

1.14. The Draft Level 2 SFRA Update (October 2026) provides information to help inform the exception test by advising whether development can be made safe for its lifetime.

1.15. It is up to the Local Planning Authority to apply the test, where it is required, and to consider the wider sustainability benefits in making a planning judgement about the suitability of the site for allocation.

Proposed allocations where the exception test is not required:

1.16. The exception test is not required to allocate land for less vulnerable uses (for example employment) or where the proposed use is more vulnerable (housing) if the site is not located within Flood Zone 3a and it is expected that vulnerable development will avoid the functional floodplain. Table 5 below identifies nine employment sites, seven residential or mixed-use sites, and one education and leisure site where it is not necessary to pass the exception test as identified in the Draft Level 2 SFRA Update (October 2026).

[4] National Planning Policy Framework (December 2023) Annex 3: Flood risk vulnerability classification

Table 5: Sites that are not required to pass the exception test.

Site Reference	Site Name	Proposed Use	Reason exception test not required
AS1	Land at Berinsfield Garden Village	Mixed	The site is not required to pass the exception test as it is not located within Flood Zone 3a
AS5	Land at Bayswater Brook, Edge of Oxford	Residential	The Draft Level 2 SFRA Update (October 2026) identifies the site as being required to pass the exception test. Outline planning permission for this site was granted on 18 November 2025. In consenting development, it was demonstrated the exception test is passed. It is therefore not necessary to demonstrate that the site has passed the exception test through the Joint Local Plan.
AS6	Rich's Sidings and Broadway, Didcot	Mixed	The site is not required to pass the exception test as it is not located within Flood Zone 3a.
AS7	Didcot Gateway, Didcot	Mixed	The site is not required to pass the exception test as it is not located within Flood Zone 3a.
AS8	North West of Grove, Grove	Residential	The site is not required to pass the exception test as it is not located within Flood Zone 3a.
AS9	North West of Valley Park	Residential	The Draft Level 2 SFRA Update (October 2026) suggests that this site does not need to pass the exception test. This is because the area of the site within Flood Zone 3a is less than 0.05% of the total site area and more vulnerable development is expected to be able to avoid Flood Zone 3a in these small areas.
AS10	Land at Dalton Barracks Garden Village, Shippon	Mixed	The Draft Level 2 SFRA Update (October 2026) suggests that this site does not need to pass the exception test. This is because the area of the site within Flood Zone 3a is less than 0.05% of the total site area and more vulnerable development is expected to be able to avoid

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			Flood Zone 3a in these small areas.
AS11	Culham Campus	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
AS12	Harwell Campus	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
AS15	Harcourt Hill Campus	Educational & Leisure	The site is not required to pass the exception test as it is not located within Flood Zone 3a.
AS16	Vauxhall Barracks, Didcot	Mixed	The site is not required to pass the exception test as it is not located within Flood Zone 3a.
JT1a	Southmead Industrial Estate, Didcot	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
JT1b	Grove Technology Park	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
JT1d	Hithercroft Industrial Estate, Wallingford	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
JT1e	Monument Business Park, Chalgrove	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
JT1f	Abingdon Science Park	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
JT1i	Former Esso Research Centre	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.
JT1k	South of Park Road, Faringdon	Employment	The site is not required to pass the exception test as it is proposed for less vulnerable uses.

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Proposed allocations where the exception test is required:

1.17. Three of the proposed allocations in the Joint Local Plan require the exception test. These sites are listed in Table 6, along with the conclusion on whether the proposed allocations pass the exception test. Proformas have been prepared for each of these sites that set out the justification for why the exception test is passed (Appendix 1).

Table 6: Sites where the exception test is required.

Site Reference	Site Name	Proposed / promoted use	Exception test passed
AS2	Land adjacent to Culham Campus	Mixed	Yes
AS3	Land South of Grenoble Road, Edge of Oxford	Mixed	Yes
AS4	Land at Northfield, Edge of Oxford	Residential	Yes

Sequential Flood Risk and Exception Tests Conclusion

1.18. The requirements of the sequential test and exception test (where required) have been passed and support the allocation of sites proposed through the Joint Local Plan. There is insufficient capacity on suitable and available sites outside of the proposed allocations to meet the councils' development needs in areas of lower flood risk. Additionally, as demonstrated through the review of the proposed allocations in the Site Selection Topic Paper (examination library reference TOP07.1) these sites have wider sustainability benefits, and the risk of flooding can be mitigated and made safe now and in the future.

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Appendix 1: Exception test proformas

AS2 Land adjacent to Culham Campus		
Site area (ha)	217.27	
Proposed development impermeable area	184.8 ha (assumed 85% of site area)	
Proposed use	This site is allocated to deliver approximately 3,500 new homes, 60 units of housing with care for older people, between 6 and 10 pitches for gypsies and travellers, supporting services and facilities and to optimise the use of existing employment land at the No.1 site.	
Flood Risk Vulnerability Classification	More vulnerable	
Medium risk	Area	Percentage
Fluvial (FZ2)	5.3ha	2.4%
Surface water Medium Risk (1% AEP event outline)	1.81ha	0.8%
High risk	Area	Percentage
Fluvial (FZ3a)	2.5ha	1.3%
Fluvial (FZ3b)	19.8ha	9.1%
Surface water (High Risk (3.3% AEP event outline)	2.6ha	1.3%
Climate change	Area	Percentage
1% AEP event + climate change (additional risk)	2.4ha	1.1%
FZ3b + Climate Change (additional risk)	2.6ha	1.2%
FZ2&3 + Climate Change (additional risk)	0.5ha	0.3%
Other sources of flood risk	Area	Percentage
Site at reservoir risk	13.1ha	6%
Groundwater	There is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.	
Description of flood risk		
87.3% of the site is located within Flood Zone 1, which is the lowest fluvial flood risk. Smaller areas of the site are located within Flood Zone 2 (2.4%), Flood Zone 3a (1.3%) and Flood Zone 3b (9.1%). There are areas within the site at either medium (0.8%) or high (1.3%) risk of surface water flooding. There is also potential for ground water and reservoir flooding. There is some additional risk of flooding with climate change.		

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In most circumstances, low lying parts of development sites are likely to be affected by multiple sources of flooding, for example both surface water flooding and fluvial flooding.

Exception test	
Evidence to demonstrate that the development would provide wider sustainability benefits to the community that outweigh the flood risk	There is sufficient site capacity to accommodate development on this site within Flood Zone 1. We have illustrated this on the indicative concept plan for this site (Figure 8.2 of the Joint Local Plan), which excludes vulnerable development in areas at risk of flooding. Additionally, Policy AS2 part 2P requires there is no built development within Flood Zones 2 or 3 other than essential and green infrastructure. Notwithstanding this, by including areas of flood risk within the site area, the development can include a strategy for addressing flood risk across the site, allowing more effective flood risk management through sustainable drainage strategies. Furthermore, any development on this site would need to comply with Joint Local Plan Policy CE6 (Flood Risk), and national planning policies and guidance on flood risk. The Joint Local Plan proposes to carry forward this allocation from the adopted South Oxfordshire Local Plan 2035. This allocation provides an opportunity to deliver wider sustainability benefits to the community that outweigh the flood risk. The allocation enables the delivery of housing adjacent to one of the major employment locations in southern Oxfordshire and has access to public transport at Culham Railway Station. Development in this location is at the heart of Science Vale and supports the delivery of much needed significant strategic infrastructure. Appendix 2 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) topic paper (examination library reference TOP07.1) identifies the reasons why we have proposed to continue this allocation. In summary these are: • The site is located on land adjacent to Culham Campus, which is a major employment site in the Science Vale area. The site is not located

DRAFT

	within an important protected landscape feature being outside the Green Belt and National Landscapes. • The Joint Local Plan's spatial strategy identifies Science Vale as a focus for new development. The strategy supports sites that are closely located, and well related to existing major employments where they are not within the Green Belt or a National Landscape.
Will the development 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?	Yes, the development can be made safe for its lifetime. The Draft Level 2 SFRA Update (October 2026) site screening report concluded: Based on current information, this site should be able to pass the exception test. However, all the recommendations suggested in this Level 2 SFRA should be considered at the site-specific FRA stage or before any site design planning.
Conclusion	
Is the exception test passed?	Yes – for the reason listed above the proposed development would deliver wider sustainability benefits and the development can be made safe for the intended lifespan including under climate change conditions.

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AS3: Land south of Grenoble Road, Edge of Oxford		
Site area (ha)	136.11	
Proposed development impermeable area	115.6ha (assumed 85% of site area)	
Proposed use	Approximately 3,000 new homes, 60 units of housing with care for older people, between 6 and 10 pitches for gypsies and travellers, 10 hectares of additional employment land, incorporating an extension to Oxford Science Park, a mobility hub serving the A4074 corridor, and supporting services and facilities.	
Flood Risk Vulnerability Classification	More vulnerable	
Medium risk	Area	Percentage
Fluvial (FZ2)	1.85ha	1.4%
Surface water Medium Risk (1% AEP event outline)	3.75ha	2.8%
High risk	Area	Percentage
Fluvial (FZ3a)	5.60ha	4.1%
Fluvial (FZ3b)	0.08ha	0.06%
Surface water (High Risk (3.3% AEP event outline)	10.4ha	7.6%
Climate change	Area	Percentage
1% AEP event + climate change (additional risk)	0ha	0ha
FZ3b + Climate Change (additional risk)	5.4ha	4.0%
FZ2&3 + Climate Change (additional risk)	0.8ha	0%
Other sources of flood risk		
Site at reservoir risk	0ha	0.6%
Groundwater	There is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.	
Description of flood risk		
94.5% of the site is located in Flood Zone 1 – the lowest level of fluvial flood risk. Around 4.2% of the site is located within areas of medium flood risk, notably Flood Zone 2 and areas at medium risk of surface water flooding. Around 0.06% of the site is located within Flood Zone 3b, 4.1% within Flood Zone 3a, and 7.6% in areas of high risk of surface water flooding. There is some additional risk of flooding with climate change.		

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In most circumstances, low lying parts of development sites are likely to be affected by multiple sources of flooding, for example both surface water flooding and fluvial flooding	
Exception test	
Evidence to demonstrate that the development would provide wider sustainability benefits to the community that outweigh the flood risk	There is sufficient site capacity to accommodate development on this site within Flood Zone 1. We have illustrated this on the indicative concept plan for this site (Figure 8.3 of the Joint Local Plan), which excludes vulnerable development in areas at risk of flooding. Additionally, Policy AS3 part 2k requires that there is no built development within Flood Zones 2 and 3, other than essential and green infrastructure. Notwithstanding this, by including areas of flood risk within the site area, the development can include a strategy for addressing flood risk across the site, allowing for more effective flood risk management through sustainable drainage strategies. Furthermore, any development on this site would need to comply with Policy CE6 – Flood Risk, and national planning policies and guidance on flood risk. The Joint Local Plan proposes to carry forward this allocation from the adopted South Oxfordshire Local Plan 2035. This allocation provides an opportunity to deliver wider sustainability benefits to the community that outweigh the flood risk. The allocation is an urban extension to the southern edge of Oxford which will promote a sustainable form of development that will in part help Oxford City by addressing the agreed unmet housing need identified in the Oxford City Local Plan 2036, first addressed through the South Oxfordshire Local Plan 2035. Development at Grenoble Road will provide specific benefits that would not be achievable elsewhere in the district; notably the provision of a new mobility hub to the south of Oxford, an extension to the Oxford Science Park and the ability to contribute to the regeneration of Blackbird Leys. Furthermore, the site would also benefit from the potential re-opening of the Cowley Branch Line at the Oxford Science Park. Appendix 2 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) topic paper (examination library reference TOP07.1) identifies the

DRAFT

	reasons why we have proposed to continue this allocation, but in summary these are: • The site is located on land adjacent to the south of Oxford. The site is not located within an important protected landscape feature being outside the areas in the districts covered by designations of Green Belt or National Landscapes. • The South Oxfordshire Local Plan 2035 identified the site as helping to provide for Oxford City's unmet housing need, including affordable housing need, close to where that need arises. • The Joint Local Plan's emerging spatial strategy states that we will allocate sufficient sites to meet the existing agreed unmet housing needs of Oxford. The emerging spatial strategy therefore provides support for the retention of sites previously allocated to address Oxford unmet housing need, i.e. those sites located close to Oxford.
Will the development 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?	Yes, the development can be made safe for its lifetime. The Draft Level 2 SFRA Update (October 2026) site screening report concluded: Based on current information, this site should be able to pass the exception test. However, all the recommendations suggested in this Level 2 SFRA should be considered at the site-specific FRA stage or before any site design planning.
Conclusion	
Is the exception test passed?	Yes – for the reason listed above the proposed development would deliver wider sustainability benefits and the development can be made safe for the intended lifespan including under climate change conditions.

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AS4 Land at Northfield, Edge of Oxford		
Site area (ha)	68.00	
Proposed development impermeable area	57.9 ha (assumed 85% of site area)	
Proposed use	This site is allocated to deliver approximately 1,800 new homes, 60 units of housing with care for older people, between 6 and 10 pitches for gypsies and travellers, and supporting services and facilities.	
Flood Risk Vulnerability Classification	More vulnerable	
Medium risk	Area	Percentage
Fluvial (FZ2)	1.9ha	2.9%
Surface water Medium Risk (1% AEP event outline)	2.3ha	3.4%
High risk	Area	Percentage
Fluvial (FZ3a)	2.3ha	3.3%
Fluvial (FZ3b)	7.8ha	11.5%
Surface water (High Risk (3.3% AEP event outline)	2.3ha	3.3%
Climate change	Area	Percentage
1% AEP event + climate change (additional risk)	0ha	0%
FZ3b + Climate Change (additional risk)	2.2ha	3.3%
FZ2&3 + Climate Change (additional risk)	0.1ha	0.2%
Other sources of flood risk		
Site at reservoir risk	0ha	0%
Groundwater	There is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.	
Description of flood risk		
82.3% of the site is located within flood zone 1, the area of lowest fluvial flood risk. Small areas of the site are located within Flood Zone 2 (2.9%), Flood Zone 3a (3.3%) and 11.5% is in Flood Zone 3b. There are areas within the site at either medium (3.4%) or high (3.3%) risk of surface water flooding. There is also potential for ground water flooding. There is some additional risk of flooding with climate change. In most circumstances, low lying parts of development sites are likely to be affected by multiple sources of flooding, for example both surface water flooding and fluvial flooding.		

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Exception test	
Evidence to demonstrate that the development would provide wider sustainability benefits to the community that outweigh the flood risk	There is sufficient site capacity to accommodate development on this site within Flood Zone 1. We have illustrated this on the indicative concept plan for this site (Figure 8.4 of the Joint Local Plan), which excludes vulnerable development in areas at risk of flooding. Additionally, Policy AS4 part 2k requires that there is no built development within Flood Zones 2 or 3, other than essential and green infrastructure. Notwithstanding this, by including areas of flood risk within the site area, the development can include a strategy for addressing flood risk across the site, allowing for more effective flood management through sustainable drainage strategies. Furthermore, any development on this site would need to comply with Policy CE6 – Flood Risk, and national planning policies and guidance on flood risk. The Joint Local Plan proposes to carry forward this allocation from the adopted South Oxfordshire Local Plan 2035. This allocation provides an opportunity to deliver wider sustainability benefits to the community that outweigh the flood risk. The allocation is an urban extension to the edge of Oxford which will promote a sustainable form of development that will in part help Oxford City by addressing the agreed unmet housing need identified in the Oxford City Local Plan 2036, and first addressed through the South Oxfordshire Local Plan 2035. Northfield is well located for access to employment and services within walking and cycling distance, and the B480 is an existing public transport corridor. The site has excellent opportunities to provide improved transport links. Furthermore, the site would also benefit from the potential re-opening of the Cowley Branch Line. Appendix 2 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) topic paper (examination library reference TOP07.1) identifies the reasons why we have proposed to continue this allocation. In summary these are:

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	• The site is located on land adjacent to the south of Oxford. The site is not located within an important protected landscape feature being outside the areas in the districts covered by designations of Green Belt or National Landscapes. • The South Oxfordshire Local Plan 2035 identified, and the Joint Local Plan continues to identify the site as helping to provide for Oxford City's unmet housing need, including affordable housing need, close to where that need arises. • The Joint Local Plan's spatial strategy states that we will allocate sufficient sites to meet the existing agreed unmet housing needs of Oxford. The spatial strategy therefore provides support for the retention of sites previously allocated to address Oxford unmet housing need, i.e. those sites located close to Oxford.
Will the development 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?	Yes, the development can be made safe for its lifetime. The Draft Level 2 SFRA Update (October 2026) site screening report concluded: Based on current information this site should be able to pass the exception test. However, all the recommendations suggested in this Level 2 SFRA should be considered at the site-specific FRA stage or before any site design planning.
Conclusion	
Is the exception test passed?	Yes – for the reason listed above the proposed development would deliver wider sustainability benefits and the development can be made safe for the intended lifespan including under climate change conditions.

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