



**AQUIND Limited**

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# **AQUIND INTERCONNECTOR**

## **Environmental Statement Addendum – Appendix 9 Sequential and Exception Test Addendum**

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulation 5(2)(a)

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

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Appendix 9 Sequential and Exception Test  
Addendum

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## CONTENTS

<b>1.</b>	<b>INTRODUCTION</b>	<b>1</b>
<b>1.1.</b>	<b>OVERVIEW AND CONTEXT</b>	<b>1</b>
<b>1.2.</b>	<b>LOCAL PLANNING POLICY CONTEXT</b>	<b>2</b>
<b>2.</b>	<b>SEQUENTIAL TEST</b>	<b>3</b>
<b>2.1.</b>	<b>CONTEXT</b>	<b>3</b>
<b>2.2.</b>	<b>APPLICATION OF THE SEQUENTIAL TEST</b>	<b>3</b>
<b>3.</b>	<b>THE EXCEPTION TEST</b>	<b>14</b>
<b>3.1.</b>	<b>INTRODUCTION</b>	<b>14</b>
<b>3.2.</b>	<b>APPLICATION OF THE EXCEPTION TEST</b>	<b>14</b>
	<b>REFERENCES</b>	<b>16</b>

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## **TABLES**

<b>Table 1 - Comparison of Potential ORS sites</b>	<b>6</b>
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## **PLATES**

<b>Plate 1 - Sites considered within the Sequential Test (with overlay of Environment Agency Flood Risk Mapping data).</b>	<b>5</b>
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# 1. INTRODUCTION

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## 1.1. OVERVIEW AND CONTEXT

- 1.1.1.1. This Sequential and Exception Test Addendum has been prepared to supplement the Sequential and Exception Test included within Section 3 of the Flood Risk Assessment ('FRA') (APP-439) (Appendix 20.4 of the 2019 ES) and should be read alongside the FRA Addendum (Appendix 8 of the ES Addendum, document reference 7.8.1.8).
- 1.1.1.2. This Sequential and Exception Test Addendum has been prepared in response to the Environment Agency's updated Flood Map for Planning (Environment Agency, Gov.uk, 2020), which took effect in January 2020, and resulted in the proposed location of the Landfall Optical Regeneration Stations ('ORS') to change from Flood Zone 2 to Flood Zone 3. The updated Flood Map for Planning can be seen in Figure 20.4 (Flood Zone Map) (APP-309 Rev02).
- 1.1.1.3. This Addendum confirms that the Sequential and Exception Test is passed for the Proposed Development for the Landfall ORS. The principles and assessment of the Sequential and Exception Test, set out in the FRA (APP-439) for the Onshore Cable Corridor and Converter Station, remain unchanged and valid, and are therefore not considered further within this Addendum.
- 1.1.1.4. In accordance with the National Policy Statement for Energy ('EN-1') (HMSO, 2011) and the National Planning Policy Framework ('NPPF') (MHCLG, 2019) the aim of the Sequential Test is to steer development to areas with the lowest probability of flooding if there are reasonably available sites appropriate to the Proposed Development in areas with a lower probability of flooding.
- 1.1.1.5. If it is not possible for development to be located in zones 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 will depend on the potential vulnerability of the Proposed Development and flood zone compatibility, in line with the NPPF (MHCLG, 2019) and Flood Risk and Coastal Change PPG (MHCLG, 2014).
- 1.1.1.6. Table 2 (Flood Risk Vulnerability Classification) of the Flood Risk and Coastal Change Planning Practice Guidance ('PPG') (MHCLG, 2014) categorises different types of uses and development according to their vulnerability to flood risk. In this context, the Proposed Development is considered to comprise **essential utility infrastructure**.

- 1.1.1.7. Table 3 (Flood Risk Vulnerability and Flood Zone ‘Compatibility’) of the Flood Risk and Coastal Change PPG (MHCLG, 2014) considers the vulnerability classes against the different flood zones to indicate where development is ‘appropriate’ and where it should not be permitted. In accordance with this approach if there is no reasonably available site in Flood Zones 1 or 2, then essential utility infrastructure which has to be located in a flood risk area for operational reasons can be located in Flood Zone 3, subject to the Exception Test, and should be designed and constructed to remain operational and safe in times of flood.

## **1.2. LOCAL PLANNING POLICY CONTEXT**

- 1.2.1.1. Policy PCS12 ‘Flood Risk’ of the Portsmouth Plan (Portsmouth City Council, 2012), identifies the need for a sequential approach to planning applications, and considers this to be met on allocated sites, and non-allocated brownfield sites (Flood Zones 2 and 3) which the Strategic Flood Risk Assessment show to be low or medium hazard areas.
- 1.2.1.2. The policy identifies that for a development to be acceptable there is a requirement for the exception test to be met in line with PPS25. However this has now been superseded by the NPPF (MHCLG, 2019) and Flood Risk and Coastal Change PPG (MHCLG, 2014), which states that essential infrastructure development located within Flood Zone 3 should be designed and constructed to remain operational and safe in times of flood.
- 1.2.1.3. As the information within the Strategic Flood Risk Assessment (Portsmouth City Council, 2016) considers outdated flood risk information within the flood hazard map this sequential test has been undertaken using the latest Environment Agency data, Flood Map for Planning and Sequential and Exception Test from the NPPF (MHCLG, 2019) and Flood Risk and Coastal Change PPG (MHCLG, 2014).

## 2. SEQUENTIAL TEST

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### 2.1. CONTEXT

2.1.1.1. When applying the Sequential Test, the Flood Risk and Coastal Change PPG (MHCLG, 2014) states that a pragmatic approach on the availability of alternatives should be taken. For nationally or regionally important infrastructure, the area of search to which the Sequential Test could be applied may be wider than the local planning authority boundary. It should be noted in this regard that this addendum considers an element of the Proposed Development, with the location of that element of the Proposed Development dictated by its function in the context of the Proposed Development as a whole.

2.1.1.2. In the context of an application for a Development Consent Order ('DCO'), it is for the Secretary of State ('SoS'), taking advice from the Environment Agency and Local Planning Authority as appropriate, to consider the extent to which Sequential Test considerations have been satisfied, taking into account the particular circumstances in any given case. A developer should justify with evidence what area of search has been used when making the application. Ultimately the SoS needs to be satisfied in all cases that the Proposed Development has been steered to areas with the lowest probability of flooding, if there are reasonably available sites, and that the Proposed Development would be safe for its design life and not lead to increased flood risk elsewhere.

### 2.2. APPLICATION OF THE SEQUENTIAL TEST

#### 2.2.1. LANDFALL ORS

##### Evidence Base

2.2.1.1. In applying a pragmatic approach to identifying alternative sites, the Applicant has used a Geographical Area of Search, based on the proposed ORS being located within 1 km of Landfall, and as identified during the scheme development the ORS site needing to be suitable to accommodate a compound of up to 450 m<sup>2</sup>. It should be noted that the parameters of the detailed design subsequently increased to a compound area of 630 m<sup>2</sup>.

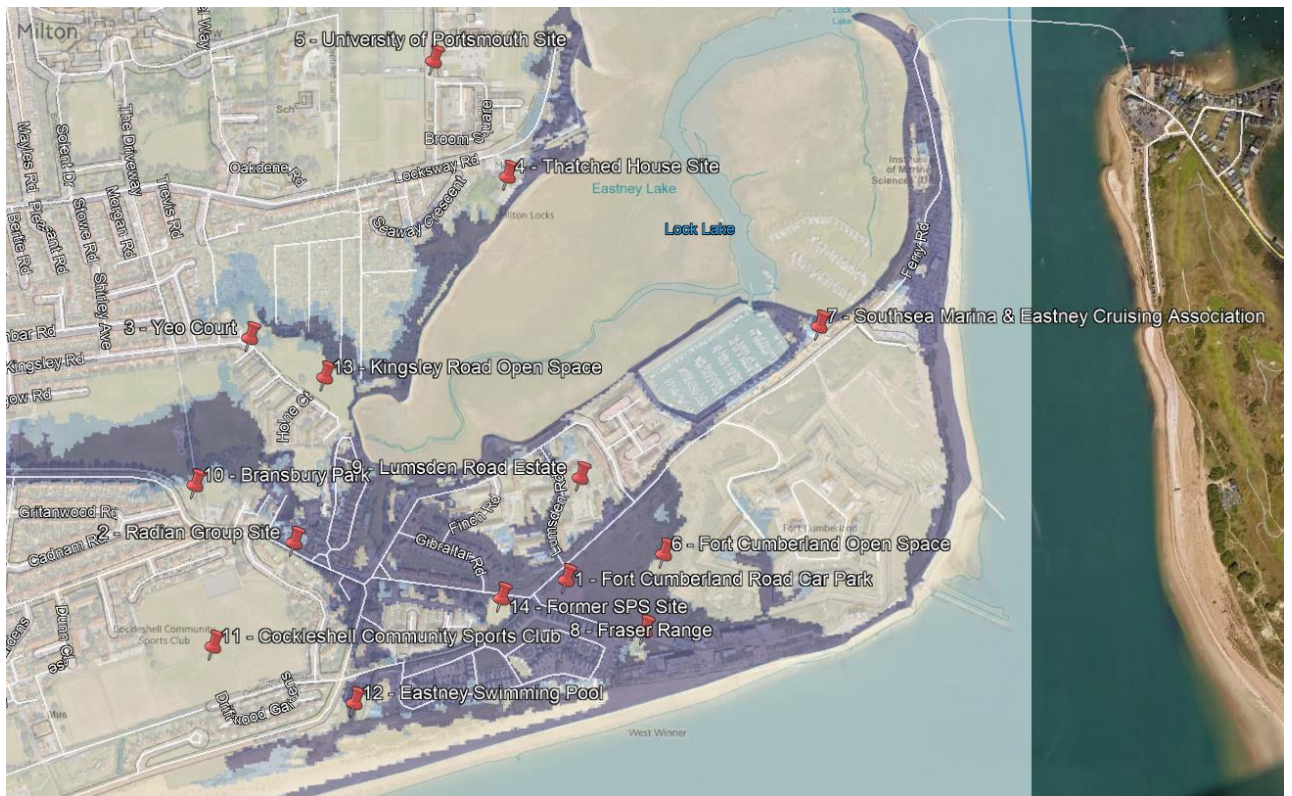
2.2.1.2. The initial search for a compound of 450 m<sup>2</sup> included all sites within the area of search that could accommodate a larger compound. Based on the increase in compound area the search parameter has already captured appropriate sites for consideration when assessing the larger site compound area of 630 m<sup>2</sup>. This increase in compound area therefore does not impact the Sequential Test and assessment of Available Alternative Sites.

2.2.1.3. In identifying the Reasonably Available Alternative Sites, the Applicant has considered the following alternative locations available to site the ORS:

- Radian Group Site;
- Yeo Court;
- Thatched House;
- University of Portsmouth (Langstone Campus);
- the open space immediately east of the car park (SINC);
- Southsea Marina, Eastney Cruising Association and the Eastney - Hayling terminal;
- Fraser Range;
- the open areas of amenity space in the locality of the Lumsden Road;
- Bransbury Park;
- Royal Marines playing fields (Cockleshell Community Sports Club) north of Driftwood Gardens;
- Land around Eastney Swimming Pool;
- Kingsley Road open space; and
- Former SPS site to south of Fort Cumberland Road.

2.2.1.4. The sites are illustrated with an overlay of the current Environment Agency Flood Map in Plate 1 below.





**Plate 1 - Sites considered within the Sequential Test (with overlay of Environment Agency Flood Risk Mapping data).**

2.2.1.5. An assessment of the sites considered within the Sequential Test (as identified on Plate 1) above are compared within Table 1 below with regards to flood risk; Local Planning Policy (or use); and constraints to delivery including land availability, policy restrictions, physical constraints or limitations, including environmental conditions, and potential impacts of the development. For the reasons summarised in Table 1, the preferred option was the Fort Cumberland Road Car Park site and all other sites were discounted.

**Table 1 - Comparison of Potential ORS sites**

Location Reference	Site Name	Flood Zone	Local Plan Status (or use)	Constraints		Consideration
				Physical (available land)	Environmental	
1	Application Site - Fort Cumberland Road Car Park	FZ3	Specific Policy Area (car park)	<ul style="list-style-type: none"> <li>• Car Park for adjacent open space and beach (loss of spaces)</li> <li>• Suitable are of land available</li> </ul>	<ul style="list-style-type: none"> <li>• Fort Cumberland SINC outside, but immediately east of the car park (no direct impact)</li> </ul>	<ul style="list-style-type: none"> <li>• Preferred site due to available space, and lack of environmental constraints or impacts on residential amenity (further detail in paragraph 2.2.1.9)</li> </ul>
2	Radian Group Site	FZ1	None	<ul style="list-style-type: none"> <li>• Buildings (residential and ancillary) on the site</li> <li>• Communal residential amenity land and drying areas</li> <li>• Limited land available, likely to be able to accommodate structures with limited compound</li> </ul>	<ul style="list-style-type: none"> <li>• Adjacent Scheduled Monument (Eastney Sewage Pumping Station) and 3 Listed Buildings associated with the Sewage Pumping Station</li> <li>• Loss of residential</li> </ul>	<ul style="list-style-type: none"> <li>• Discounted – potential for significant adverse impacts to residential amenity and heritage assets</li> </ul>

Location Reference	Site Name	Flood Zone	Local Plan Status (or use)	Constraints		Consideration
				Physical (available land)	Environmental	
					amenity (noise, disturbance, loss of open space)	
3	Yeo Court	FZ1	Coastal Zone	<ul style="list-style-type: none"> <li>• Amenity grassland, potential visibility splay impact</li> <li>• 140 sq.m. inadequate to accommodate ORS</li> <li>• Low development potential due to irregular shape</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of residential amenity (noise and disturbance)</li> </ul>	<ul style="list-style-type: none"> <li>• Discounted, lack of available space and potential for significant adverse impacts on residential amenity.</li> </ul>
4	Thatched House	FZ1	Coastal Zone, Langstone Harbour Open Coastal Area	<ul style="list-style-type: none"> <li>• Car Park</li> <li>• Adequate area of land available subject to landowner agreement regarding customer parking for the public house</li> </ul>	<ul style="list-style-type: none"> <li>• Adjacent to Milton Locks Nature Reserve and the Langstone Harbour SSSI, SAC and SPA</li> <li>• Adjacent Milton Locks Conservation Area</li> </ul>	<ul style="list-style-type: none"> <li>• Discounted, impact on viability of existing business due to a significant loss of car parking for customers</li> </ul>

Location Reference	Site Name	Flood Zone	Local Plan Status (or use)	Constraints		Consideration
				Physical (available land)	Environmental	
5	University of Portsmouth, Langstone Campus	FZ1	Open Space, Coastal Zone	<ul style="list-style-type: none"> <li>Existing sports/playing pitches</li> <li>Access restrictions to Furze Lane</li> <li>Adequate area of land available outside pitches</li> </ul>	<ul style="list-style-type: none"> <li>Ecology - playing pitches are a secondary support area for Solent Waders and Brent Geese, permanent loss of available land</li> </ul>	<ul style="list-style-type: none"> <li>Discounted, loss Solent Waders and of Brent Geese Site</li> </ul>
6	Fort Cumberland (Open Space)	FZ3	Open Space	<ul style="list-style-type: none"> <li>Underground structures</li> <li>Adequate area of land available</li> </ul>	<ul style="list-style-type: none"> <li>Local Wildlife Site, with resultant loss</li> <li>part Ancient Monument (impact on setting and potential impact on underground structures)</li> <li>Undeveloped green space</li> </ul>	<ul style="list-style-type: none"> <li>Discounted – loss of public open space and negative ecological impact</li> </ul>
7	Southsea Marina &	FZ1/2/3	Specific Policy Area,	<ul style="list-style-type: none"> <li>Active marina site (including dry dock</li> </ul>		<ul style="list-style-type: none"> <li>Discounted, lack of available space</li> </ul>

Location Reference	Site Name	Flood Zone	Local Plan Status (or use)	Constraints		Consideration
				Physical (available land)	Environmental	
	Eastney Cruising Association		Coastal Zone, Langstone Harbour Open Coastal Area	areas) with no available space to meet the land area requirements		
8	Fraser Range	FZ3	Specific Policy Area	<ul style="list-style-type: none"> <li>Area not considered to be available due to being subject to a pending planning application for a major residential development providing up to 134 dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Adjacent Scheduled Monument (Fort Cumberland)</li> </ul>	<ul style="list-style-type: none"> <li>Discounted, lack of available space and proximity to scheduled monument</li> </ul>
9	Lumsden Road ancillary open space	FZ1/2/3	Coastal Zone	<ul style="list-style-type: none"> <li>Residential housing estate</li> <li>Ancillary/residential open space</li> <li>Some adequate areas available</li> </ul>	<ul style="list-style-type: none"> <li>Loss of residential amenity due to proximity to dwellings (noise) and loss of open space</li> </ul>	<ul style="list-style-type: none"> <li>Discounted – adverse residential amenity impacts</li> </ul>

Location Reference	Site Name	Flood Zone	Local Plan Status (or use)	Constraints		Consideration
				Physical (available land)	Environmental	
					<ul style="list-style-type: none"> <li>Residential Amenity would be negatively impacted from the loss of open space</li> </ul>	
10	Bransbury Park	FZ1/2/3	Open Space, Coastal Zone	<ul style="list-style-type: none"> <li>Public open space and car park (loss of open space of car parking)</li> <li>Adequate land available</li> </ul>	<ul style="list-style-type: none"> <li>Loss of public open space</li> </ul>	<ul style="list-style-type: none"> <li>Discounted – loss of public open space</li> </ul>
11	Cockleshell Community Sports Club	FZ1	Open Space	<ul style="list-style-type: none"> <li>Existing playing pitches</li> <li>Adequate land available</li> </ul>	<ul style="list-style-type: none"> <li>Adjacent Scheduled Monument (Eastney forts and perimeter defences of barracks)</li> <li>Ecology - playing pitches are a core area for Solent Waders and Brent Geese,</li> </ul>	<ul style="list-style-type: none"> <li>Discounted, loss of Solent Waders and Brent Geese Site and open space</li> </ul>

Location Reference	Site Name	Flood Zone	Local Plan Status (or use)	Constraints		Consideration
				Physical (available land)	Environmental	
					permanent loss of available land	
12	Eastney Swimming Pool, land to south of	FZ1/3	Specific Policy Area	<ul style="list-style-type: none"> <li>• Adequate land available</li> </ul>	<ul style="list-style-type: none"> <li>• Grade II Listed Building on site (World War II Pillbox at Eastney Beach)</li> <li>• Setting of Eastney Beach/Coast</li> </ul>	<ul style="list-style-type: none"> <li>• Discounted, potential for significant adverse impacts on setting of coast and listed buildings</li> </ul>
13	Kingsley Road Open Space	FZ1/2	Open Space, Coastal Zone	<ul style="list-style-type: none"> <li>• Public open space</li> <li>• Adequate land available</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of public open space</li> </ul>	<ul style="list-style-type: none"> <li>• Discounted – loss of public open space</li> </ul>
14	Former SPS Site	FZ1	Open Space	<ul style="list-style-type: none"> <li>• Playground and public open space</li> <li>• Raised land</li> <li>• Adequate land available</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of public open space</li> </ul>	<ul style="list-style-type: none"> <li>• Discounted – loss of public open space</li> </ul>

### **Application of Sequential Test**

2.2.1.6. As stated in the introduction, the Sequential Test identifies a preference to locating projects in Flood Zone 1 before considering Flood Zone 2 and then Flood Zone 3. The following paragraphs summarise the sites considered available as presented in Table 1 and the relevant considerations.

#### **Availability in Flood Zone 1**

2.2.1.7. Table 1 identifies the key constraints at each of the potential sites for the ORS in Flood Zone 1 including the potential for visual impacts to the Fort Cumberland and Eastney Sewage Pumping Station Ancient Monuments, impacts on residential amenity, unsuitable (limited) land availability to accommodate the required infrastructure, potential impacts to designated wildlife sites (including impacts on Solent Waders and Brent Geese sites), and negative impacts on publicly open space and recreational facilities. For these reasons, it is considered that there are no appropriate sites reasonably available for the purpose of the ORS in Flood Zone 1.

#### **Availability in Flood Zone 2**

2.2.1.8. As there are no appropriate sites available in Flood Zone 1, sites located in Flood Zone 2 have been considered next; however, the sites assessed which are located in Flood Zone 2, as presented in Table 1, were not considered appropriate as their use would result in the permanent loss of designated publicly accessible open space. The Fort Cumberland Road Car Park was previously located within Flood Zone 2 however following to the January 2020 update to the Flood Map for Planning, this site has moved to Flood Zone 3.

#### **Availability in Flood Zone 3**

2.2.1.9. The remaining sites [Fort Cumberland Road Car Park, Fort Cumberland (Open Space), Southsea Marina & Eastney Cruising Association, Fraser Range, Lumsden Road ancillary open space, Bransbury Park and Eastney Swimming Pool, land to south of] available, and as considered in Table 1, are located within Flood Zone 3.

2.2.1.10. Of these sites, the Fort Cumberland Road Car Park (previously identified to be located in Flood Zone 2, however moved to Flood Zone 3 following to the January 2020 update to the Flood Map for Planning) was considered to provide the most appropriate location in terms of being identified to give rise to the least adverse environmental impacts.

2.2.1.11. The car park (brownfield site) provides an area of existing compacted ground for car parking, with no formal open space use. It is also directly adjacent to the proposed Landfall. The infrastructure associated with Landfall (High Voltage Direct Current ('HVDC') Cables and Transition Joint Bays) are to be located below ground and cannot be constructed atop. In locating the ORS immediately adjacent to the landfall, the need for additional cabling to an alternative location and the associated construction disruption and easement requirements are significantly reduced.



- 2.2.1.12. The Fort Cumberland Road Car Park location was not considered to have any significant impact on residential amenity, adjacent Fort Cumberland SINC or the setting of the Fort Cumberland Scheduled Ancient Monument given its distance is over 200 m from the car park, with opportunities for landscape screening to be provided to reduce the visual impact of the above ground elements. Further, opportunities were identified to rationalise the car parking layout at the car park to reduce the loss of car parking spaces.

**Conclusion**

- 2.2.1.13. Based on Table 3 (Flood Risk Vulnerability and Flood Zone ‘Compatibility’) of the NPPF (MHCLG, 2019) and Flood Risk and Coastal Change PPG (MHCLG, 2014), the ORS is appropriate to be located in Flood Zone 3, as no other suitable alternative locations were considered to be reasonably available in Flood Zone 1 or Flood Zone 2 , as considered within Table 1, subject to passing the Exception Test (see Section 3 below).

## 3. THE EXCEPTION TEST

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### 3.1. INTRODUCTION

3.1.1.1. The Environment Agency's updated Flood Map for Planning (Environment Agency, Gov.uk, 2020), which took effect in January 2020, resulted in the proposed location of the Landfall ORS to change from Flood Zone 2 to Flood Zone 3; therefore the Exception Test must be applied for the Landfall ORS, which is now located in Flood Zone 3. The Exception Test provides a method of managing flood risk while still allowing necessary development to occur.

3.1.1.2. For the Exception Test to be passed in accordance with the NPPF (MHCLG, 2019) & EN-1 (HMSO, 2011) it should be demonstrated that:

- (NPPF & EN-1) the development would provide wider sustainability benefits to the community that outweigh the flood risk;
- (EN-1) the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land, subject to any exceptions set out in the technology-specific National Policy Statements ('NPSs'); and
- (NPPF & EN-1) 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.

### 3.2. APPLICATION OF THE EXCEPTION TEST

#### 3.2.1. LANDFALL ORS

3.2.1.1. It is considered that the Exception Test in accordance with the NPPF (MHCLG, 2019) and EN-1 (HMSO, 2011) has been passed for the Landfall ORS based on the following:

- **NPPF & EN-1 Requirement:** The development would provide wider sustainability benefits to the community that outweigh the flood risk:
  - The UK Government has identified a need for Interconnectors as a key element of the UK electricity network and the SoS has specifically recognised the Proposed Development as being of national significance. Accordingly, the Proposed Development, including the ORS, is essential infrastructure, providing security of energy supply with significant sustainability benefits on a national scale, and in turn the local community which outweigh the flood risk.

- **EN-1 Requirement:** the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs:
  - The ORS would be located on previously developed land, subject to no statutory designations and thus considered to be developable, comprising an area of existing compacted ground used for car parking (informal with no demarcated bays). The sequential test demonstrates that no suitable alternative sites are reasonably available when considered against wider environmental and sustainability objectives;
- **NPPF & EN-1 Requirement:** 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:
  - Noting the requirements of the Exception Test for essential infrastructure within the Flood Risk and Coastal Change PPG (MHCLG, 2014) that ‘essential infrastructure should be designed and constructed to remain operational and safe in times of flood’, the risk of flooding has been considered in the design of the ORS with appropriate mitigation included to ensure the Proposed Development, as essential infrastructure, can be designed and constructed to remain operational and safe in times of flood and over its lifetime.
  - Mitigation and design measures against flood risk for the landfall ORS includes surface water management and tidal flood resilience measures as detailed within the FRA (APP-439) and FRA Addendum (Appendix 8 of the ES Addendum, document reference 7.8.1.8) to specified design standards in relation to the current understanding of the flood risk profile, predicted extreme flood events and future climate change scenarios and will be further developed during detailed design.
  - The Environment Agency have confirmed on 24 March 2020 that whilst the Landfall ORS is located in Flood Zone 3 (following an update to flood mapping as considered within the FRA Addendum (Appendix 8 of the ES Addendum, document reference 7.8.1.8)), they remain comfortable with the building being located there based on its usage (i.e. non-residential) and the approach outlined in the Application regarding in-built mitigation.

### **Landfall ORS Summary**

#### 3.2.1.2.

It is considered that the Landfall ORS has passed the Exception Test as it has been demonstrated that it will accord with the requirements of the NPPF (MHCLG, 2019) and EN-1 (HMSO, 2011).

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