

## **UPPER BEEDING NEIGHBOURHOOD DEVELOPMENT PLAN**

### **PLAN SUBMISSION VERSION : Regulation 15 of the Neighbourhood Planning Regulations 2012 SEQUENTIAL TEST**

**December 2018**

(Revised document to address  
the Reg.14 comments)

**Disclaimer**

The evidence base used as the framework for this assessment including the site work and SEA/SA were provided by other parties and as such the conclusions and recommendations contained in this Report are based upon information provided by others. All sites in this Report were assessed by Moles Consultancy using a desk top appraisal but other parties have done site visits. It is upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. This document forms an evidence base report, rather than neighbourhood plan policy.

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# 1. Background

## Purpose of the document

- 1.1 This document assesses the flood risk to all the sites that have been brought forward and are being considered as part of the Upper Beeding Neighbourhood Plan (UBNP). This report seeks to support the sequential, risk-based selection of sites within the draft Plan, through application of the Sequential and Exception Tests, and providing an assessment of potential development sites in the Parish which have been identified as having a risk of flooding.
- 1.2 Flood risk has been a key consideration in the site selection process. The purpose of this report is to demonstrate that even though some of the sites identified through the Neighbourhood Development Plan contain areas of flood risk, these areas are appropriate in the context of the Sequential and Exception Tests which are required as part of the National Planning Policy Framework (NPPF).
- 1.3 This report outlines the planning policy context in terms of national planning policy and local flood risk. It also identifies the sites in the draft NDP where a Sequential or Sequential and Exception Test are required and then concludes the findings. It has taken into account comments made by the Local Planning Authority, Environment Agency and West Sussex County Council.
- 1.4 This document should be read in conjunction with the Strategic Environmental Assessment/ Sustainability Appraisal (SEA/SA) and the AECOM Site Assessment report 2018.

# 2. Planning Policy Context

## The National Planning Policy Framework

- 2.1 The National Planning Policy Framework (paragraph 100) requires Plans such as the District Plan and Neighbourhood Plans to “apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by applying the Sequential Test, and, if necessary, applying the Exception Test”.
- 2.2 Under the National Planning Policy Framework (NPPF) (2014), Neighbourhood Development Plans (NDPs) are subject to the same flood risk policies as Local Planning Authority Local Plans. As a result, a sequential, risk-based approach should be applied to allocate sites within the NDP.

## Local Planning Policy Framework

- 2.3 The parish of Upper Beeding is divided by the boundary of the South Downs National Park. The area that is outside of the South Downs National Park is within the district of Horsham. The Horsham District Planning Framework (HDPF), adopted in 2015, is the most up to date local plan for the area. Horsham District Council (HDC) is working on the emerging Horsham District Local Plan but it is at the early stages of preparation with no drafts published (Source: Horsham Local Development Scheme 2017). The 2015 HDPF replaced the Core Strategy and General Development Control Policies adopted in 2007. However, the Core Strategy and

General Development Control Policies adopted in 2007 remain the current development plan documents for the areas of Upper Beeding parish that are within the South Down National Park, ahead of the adoption of the South Downs Local Plan (SDLP) which is currently being prepared. It is intended that the SDLP will be submitted to the Secretary of State for Examination-in-Public in March 2018 with adoption in September 2018 (Source: South Downs Local Development Scheme August 2017). The majority of the built up area within the parish falls within HDC.

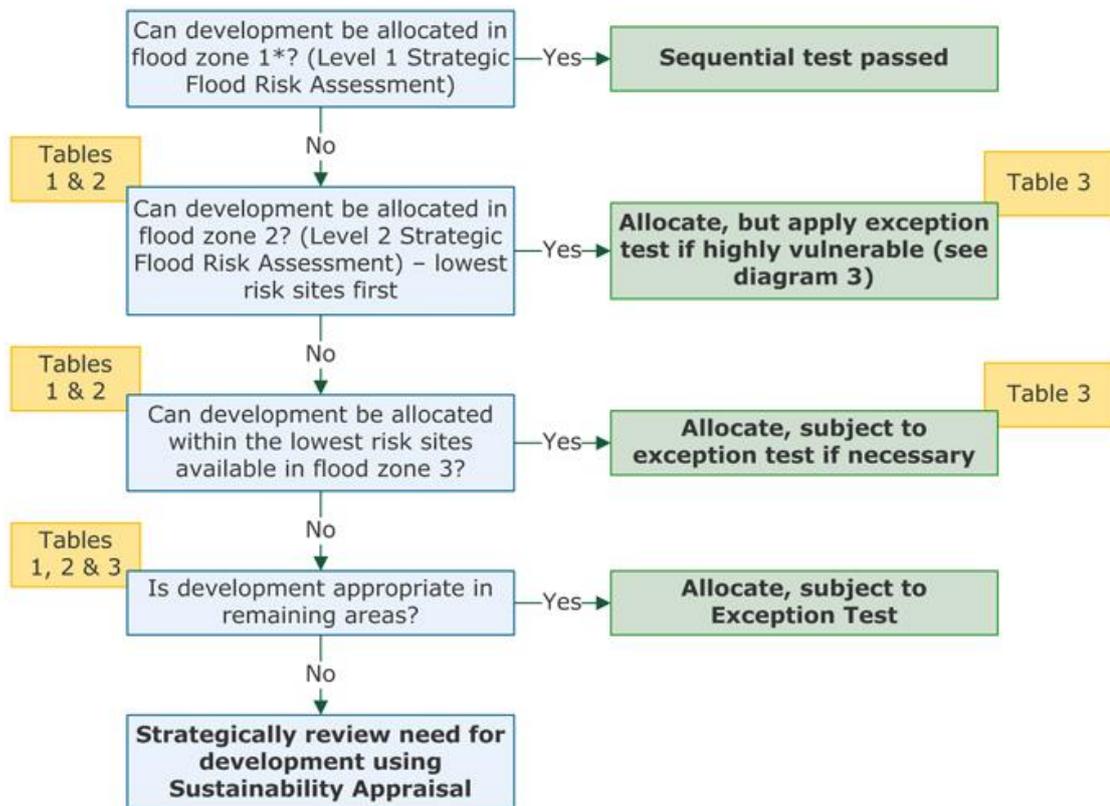
- 2.4 Whilst the UBNP must conform with the policies in the HDPF, we advise that other plans are relevant and should be considered. In particular, the South Downs National Park Management Plan (and the emerging Local Plan), but also any green infrastructure strategies, biodiversity plans or river basin management plans for the area.
- 2.5 A Housing Needs Assessment (November 2017) for the Neighbourhood Plan identifies that the minimum housing need for Upper Beeding is 213 dwellings, or 15 dwellings per year over the Plan Period (rounded).

### 3. Flood risk in the Parish

- 3.1 UBPC is part of the Horsham District, under the jurisdiction of Horsham District Council, situated in the County of West Sussex. The main settlements in the parish are Upper Beeding and Small Dole. The parish covers 1,877 hectares (4,637 acres). Upper Beeding is the larger settlement in the parish. The River Adur borders part of the village of Upper Beeding, consequently, some of the village is subject to Flood Zones 2 and 3.
- 3.2 The village of Upper Beeding lies on the east bank of the River Adur at the head of the Adur gap, where the river cuts through the downs to reach the sea at Shoreham some 8 km away. Its highest point is at 216m on Truleigh Hill and the lowest at sea level on the tidal River Adur. Soils in the village near the river consist of alluvial silts and gravels; clays and sands make up the Low Weald, and chalk predominates on the Downs and where houses climb the lower slopes such as on Windmill Hill.
- 3.3 The river is the predominant source of flood risk within the neighbourhood plan area, although there is risk of flooding from groundwater, surface water and sewer flooding to a lesser extent. It should however be noted that the Horsham District Strategic Flood Risk Assessment (Final Report- Revised 2010 did not identify any records of groundwater flooding in the District)
- 3.4 Other relevant constraints are:
  - Land within Flood Zones 3 and 2, associated with the flood risks from the River Adur and Woods Mill Stream. The ecological value of these watercourses and their adjacent land is also an environmental consideration.
  - Source Protection Zone 1 (sensitive inner zone), 2 (outer zone) and 3 (total catchment area), which are designated to protect individual groundwater sources for public water supply; is of most significance is the Southern Water abstraction near Castle Town.
  - Historic and authorised landfill sites, including the Horton and Small Dole sites in the north of the parish.

## 4. The Sequential Test and Exception Test in preparation of a Neighbourhood Development Plan

- 4.1 The Sequential Test and Exception Test are processes put in place by the NPPF to ensure that development is allocated and permitted in areas of the lowest possible flood risk. The general aim is to steer development away from the medium and high risk areas (Flood Zone 2 and Flood Zone 3), however the risk from other sources of flooding must also be considered.
- 4.2 Further details and guidance on application of the Sequential Test and Exception Test can be found in the National Planning Practice Guidance. The overall process, as set out within the Planning Practice Guidance (PPG), is shown in Figure 1 below.



\* Other sources of flooding also need to be considered

**Figure 1: Application of the Sequential Test**

### **The Sequential Test**

- 4.3 The Sequential Test is a process which must be performed when determining the location of future development. It is designed to ensure that development is steered away from areas at high risk of flooding, where possible. Potential development sites are considered against their location within Flood Zone 1 (low risk), Flood Zone 2 (medium risk) and Flood Zone 3a (high risk), as well as their coverage by other sources of flood risk.  
It is a reasonable assumption that individual sites within Zone 1 satisfy the requirements of the Sequential Test; however, consideration should be given to risk from all sources of flooding, as well as areas with critical drainage problems.
- 4.4 Where required growth cannot be met by sites within Flood Zone 1, sites within Flood Zone 2 are then considered within a more detailed, Level 2 SFRA. If development cannot be accommodated within Flood Zone 2, lower risk sites in Flood Zone 3 can be considered, although the Exception Test must be applied.

### **The Exception Test**

- 4.5 Following application of the Sequential Test, it may not be possible for all development to be located in areas with a low probability of flooding. In this case, the Exception Test must then be applied, to ensure that more vulnerable property types, such as residential development can be implemented safely.
- 4.6 For the Exception Test to be satisfied, and development to be allocated, the following two criteria must be met:
1. The development must provide wider sustainability benefits to the community that outweigh flood risk.
  2. A site-specific Flood Risk Assessment must demonstrate 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, will reduce flood risk overall.

## **5.0 Flood risk assessment**

### **Flood risk and zones**

- 5.1 For the purposes of this report, the definition of “flood risk” is taken from the National Planning Practice Guidance (NPPG) and refers to a combination of the probability and the potential consequences of flooding from all sources including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, holding basins canals and lakes and other artificial sources.
- 5.2 The Environment Agency (EA) provides mapping of flood risk arising from sea and river sources. This mapping does not take into account the presence of flood defences nor does it account for the potential impact of climate change, including sea-level rise and extreme weather events.

5.3 Flood risk is mapped according to the probability of flooding and is expressed in three “Flood Zones” (See table 1):

**Table 1: Summary of fluvial Flood Risk Zones**

Flood Zone	Risk of Fluvial Flooding
1	Low probability – land assessed as having a less than 1 in 1,000 annual probability of flooding (<0.1%)
2	Medium probability – land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of flooding (1% - 0.1%)
3a	High probability – land assessed as having a 1 in 100 or greater annual probability of flooding (>1%)
3b	This zone comprises land where water has to flow or be stored in times of flood.

5.4 Tables 2 shows which type of development can be appropriately located in each flood zone, and where the Exception Test is required.

**Table 2: Flood risk Vulnerability and flood zone compatibility**

Flood risk vulnerability classification	Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
<b>Zone 1</b>	✓	✓	✓	✓	✓
<b>Zone 2</b>	✓	✓	Exception test Required	✓	✓
<b>Zone 3a</b>	Exception test required	✓	X	Exception test required	✓
<b>Zone 3b functional floodplain</b>	Exception test required	✓	X	X	X

Key

✓ Development is appropriate.

X Development permitted where risks are mitigated and there are wider benefits

### **Assessment of flood risk for potential development areas identified for development**

- 5.5 In applying the sequential test to the NDP, the following principles have been considered.
1. The geographical area across which the sequential test should be applied will be defined by local circumstances relating to the catchment area for the type of development proposed.
  2. Where there are large areas in Flood Zones 2 and 3 and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives.
  3. When applying the sequential test, a pragmatic approach to the availability of alternatives sites has been taken.
- 5.6 In accordance with national planning policy, in order for development to pass the sequential test it has to be demonstrated that there are no availability of reasonable alternative sites

appropriate for the proposed development located in areas with a lower risk of flooding. Reasonable available sites are those that are deliverable and developable (as defined by the NPPF, para. 47) for the allocation proposed and:

1. The site is within the agreed area of search.
  2. The site is of comparable size and can accommodate the requirements of the proposed development.
  3. The site is either owned by the applicant; OR for sale at a fair market value; or Is publicly owned land that has been formally declared to be surplus and is available for purchase.
  4. The site is not safeguarded in the Local Plan for another use. Sites are not considered to be reasonably available if they fail to meet any of the above requirements or already have planning permission for a development that is likely to be implemented.
- 5.7 For purposes of this document, the area of search for alternative sites is the whole of the Neighbourhood Plan Area.
- 5.8 In total 19 sites were submitted to the Parish Council during the call for sites exercise. Not all of the 19 sites were put forward to AECOM for the site assessment work and a summary of the reasons for this decision is attached as an Appendix to the neighbourhood plan. The sequential test is therefore based on the 9 sites assessed in the AECOM Site Assessment report 2018 and the site references used are the same for consistency. However, all the 19 sites have been considered as part of the Sustainability Appraisal.
- 5.9 The table 3 shows the analysis of the proposed development sites identified in the Neighbourhood Plan site assessment.

**Table 3: Analysis of the proposed development sites identified in the Neighbourhood Plan site assessment**

Site Ref.	Location	Site area (ha) <sup>2</sup>	Flood risk zone (FZ)	Existing Flood Defence	Existing land use	Proposed use
Site 1	Strip of Land, Smugglers Lane	0.66	The eastern boundary of the site is located within FZ 3	no	Agriculture, grazing	Residential
Site 2	Land east of Pound Lane	1.09	The eastern boundary of the site is located within FZ 3	no	Agriculture, grazing	Residential
Site 3	Little Paddocks	2.17	The north and east parts of the site are located within FZ 3	no	Agriculture, grazing, paddocks	Residential
Site 4	Land at Greenfields, Henfield Road	0.32	The southern part of the site is located within FZ 3	no	Highways depot	Residential
Site 5	Oxcroft Farm, Small Dole	1.31	Flood zone 1	no	Farm, agriculture, grazing	Residential
Site 6	Valerie Manor (within SDNP)	0.44	The southwest corner of the site is located within FZ 3	no	Greenfield within the grounds of Valerie Manor	Care home
Site 7	Church Farm adjacent to Caravan Park	0.56	Flood zone 1	no	Greenfield, scrub	Residential
Site 8	Riverside Caravan Park	0.22	Flood zone 3	yes	Holiday caravan homes	Residential
Site 9	Land west of Henfield Road, Small Dole	2.32	Flood zone 1	no	Residential, agriculture	Residential

## 5.10 The Sequential Test

1. Are the proposed development areas in Flood Zone 1 – Low probability of flood risk?	
yes	<b>Development areas wholly within Flood Zone 1:</b> <ul style="list-style-type: none"> <li>• Oxcroft Farm, Small Dole</li> <li>• Church Farm adjacent to Caravan Park</li> <li>• Land west of Henfield Road, Small Dole</li> </ul>
	<b>Development areas partly within Flood Zone 1:</b> none
2. Are the proposed development areas in Flood Zone 2? – Medium probability of flood risk?	
	<b>Development areas wholly within Flood Zone 2:</b> none
yes	<b>Development areas partly within Flood Zone 2:</b> <ul style="list-style-type: none"> <li>• Strip of Land, Smugglers Lane</li> <li>• Land east of Pound Lane</li> <li>• Little Paddocks</li> <li>• Land at Greenfields, Henfield Road</li> <li>• Valerie Manor</li> </ul>
3. Are the proposed development areas in Flood Zone 3? – High probability of flood risk?	
yes	<b>Development areas wholly within Flood Zone 3:</b> <ul style="list-style-type: none"> <li>• Riverside Caravan Park</li> </ul>
yes	<b>Development areas partly within Flood Zone 3:</b> <ul style="list-style-type: none"> <li>• Strip of Land, Smugglers Lane</li> <li>• Land east of Pound Lane</li> <li>• Little Paddocks</li> <li>• Land at Greenfields, Henfield Road</li> <li>• Valerie Manor</li> </ul> <p>Flooding is a serious potential risk with areas of these sites being in FZ3 which would be subject to the Exception Test. Any proposal would have to satisfy EA and LPA, with a Flood Plan and emergency access.</p>

## 5.11 The sequential approach to development

4. What are the allocations outside flood zone 1
<ul style="list-style-type: none"> <li>• Strip of Land, Smugglers Lane</li> <li>• Land east of Pound Lane</li> <li>• Little Paddocks</li> <li>• Land at Greenfields, Henfield Road</li> <li>• Valerie Manor</li> <li>• Riverside Caravan Park</li> </ul>
<b>a) Identify alternative sites that were considered and explain why they were dismissed</b> <ul style="list-style-type: none"> <li>• <b>Church Farm adjacent to Caravan Park</b>                      This is a Greenfield site which is included in the SHELAA site reference: SA629. The site is located within the Risk Zone of the Beeding Hill to Newtimber Hill SSSI. The site is also located within the River Adur Water Meadows and Wyckham Wood Site of Nature Conservation Importance. As such, there would be a direct loss of this designation as result of any development at the site. This site would have a number of detrimental impacts on the environment, with very few positive benefits if at all and hence is not recommended for allocation within the Plan.                 </li> </ul>

- **Land west of Henfield Road, Small Dole**

This site is outside the existing built up area boundary and is poorly located with regards to proximity to amenities and services. The site is located within the Risk Zone of the Beeding Hill to Newtimber Hill SSSI. The southern part of the site is located within the South Downs National Park and would result in the loss of greenfield land from the National Park.

**b) explain why the allocations cannot be directed to Flood Zone 1 elsewhere in the neighbourhood area**

The Land east of Pound Lane, Greenfield, Oxcroft Farm and Riverside Caravan Park are allocated based on the results of the SEA/SA which looks at the environmental, social and economic impact of the sites. The allocation of these sites have many benefits to the community. It is assumed that Part 1 of the Exception test would be passed for the portions of the Sites which are outside Flood zone 1 because of the wider sustainability benefits to the community that outweigh flood risk and demonstrate those sustainability aspects, as shown in the Sustainability Assessment of all the sites. Where sites are wholly or partly located in areas where there are other sources of flooding, a site-specific flood risk assessment will be required at planning application stage. For the planning applications, a sequential approach to development within the sites, Part 2 of the Exception test and the use of Sustainable Drainage Systems will be necessary to avoid and mitigate any impact. Part 2 of the Exception Test requires the development to be safe, and this will need to be demonstrated in a Flood Risk Assessment.

The benefits of developing these sites are very much in-keeping with the NPPF and indeed the ethos of Neighbourhood Planning which is based on the SEA/SA outweighs the presumption against locating what is classed as “more vulnerable” developments in Flood Zone 2 and 3.

## 6. Summary and Conclusion

- 6.1 The Sustainability Appraisal is designed to test the Plan and is a means of identifying and mitigating any potential adverse effects that the Plan might otherwise have. In doing so it ensures that the proposals in the Plan are the most appropriate given the reasonable alternatives. The SA process helps test the Plan through the use and application of evidence and therefore helps with developing options. Within the context of the Sequential Test the SA helps balance the alternatives for providing development based on a holistic consideration of the wider sustainability benefits which may outweigh those posed by flooding. In this regard, the Sustainability Appraisal has been used as a tool to assess the sites and to determine what merits further consideration within the Exception Test.
- 6.2 The sequential and exception test is intended to guide decision making and provide evidence for the eventual site selection to help ensure that the Neighbourhood Development Plan can meet the Basic Conditions as determined by the Independent Examiner, as well as any potential legal challenges by developers and other interested parties.

Table 4: Conclusion of the proposed sites sequential and exception test

Site Ref.	Location	Allocated in the Plan	Flood risk zone (FZ)	Passes the Sequential test	Passes the exception test
Site 1	Strip of Land, Smugglers Lane	Yes (sites 1,2 &3 to be combined)	The eastern boundary of the site is located within FZ 3	No	Yes (Part 1 met and Part 2 to be met through mitigation proposals)
Site 2	Land east of Pound Lane	Yes (sites 1,2 &3 to be combined)	The eastern boundary of the site is located within FZ 3	No	Yes (Part 1 met and Part 2 to be met through mitigation proposals)
Site 3	Little Paddocks	Yes (sites 1,2 &3 to be combined)	The north and east parts of the site are located within FZ 3	No	Yes (Part 1 met and Part 2 to be met through mitigation proposals)
Site 4	Land at Greenfields, Henfield Road	Yes	The southern part of the site is located within FZ 3	No	Yes (Part 1 met and Part 2 to be met through mitigation proposals)
Site 5	Oxcroft Farm, Small Dole	Yes	Flood zone 1	Yes	n/a
Site 6	Valerie Manor (within SDNP)	Yes	The southwest corner of the site is located within FZ 3	No	Yes (Part 1 met and Part 2 to be met through mitigation proposals)
Site 7	Church Farm adjacent to Caravan Park	NO	Flood zone 1	n/a	n/a
Site 8	Riverside Caravan Park	Yes	Flood zone 3	No	Yes (Part 1 met and Part 2 to be met through mitigation proposals)
Site 9	Land west of Henfield Road, Small Dole	NO	Flood zone 1	n/a	n/a

6.3 The Upper Beeding Neighbourhood Development Plan will through its nature and subject have an impact on the environment. In terms of the actual allocations the majority of policies are focused in the existing settlements and the development boundaries. However, the allocations for sites will focus development in the lowest risk areas of flood risk and where part of a location is within the higher zones it is expected that mitigation can be achieved.

6.4 Taking into account the advice presented within the AECOM Site assessment report that three sites to the north of Upper Beeding village (strip of land at Smugglers Lane, land east of Pound Lane and Little Paddocks) would, if they were combined into a comprehensive scheme, bring forward a number of benefits for the settlement and wider parish. As all three sites were assessed through the SA process as having a positive impact on a number of sustainability objectives, it has been decided and expeted to come forward as a comprehensive site. and be included within the neighbourhood plan. This combined site is named Land east of Pound Lane. The other sites to be taken forward include land at Greenfield, Oxcroft Farm and Riverside Caravan Park.

- 6.5 The parish council has taken a positive approach in delivering the housing as required by the OAN. When assessed against the considerations in the SEA/SA, Land east of Pound Lane, Greenfield, Oxcroft Farm and Riverside Caravan Park outweigh the other sites assessed and have therefore been allocated in the NDP. It needs to be recognised that the SEA/SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based only on these factors in order to select an option. Factors such as public opinion, deliverability, wider benefit to the community and conformity with national policy have also be taken into account when selecting options for the plan. To this end, these sites have been allocated although a section of the sites are in FZ3, as such needs to pass the Exception test.
- 6.6 The Exception Test is only appropriate when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary for wider sustainable development reasons.
- 6.7 It is assumed that Part 1 of the Exception test would be passed for the portions of the sites which is outside Flood zone 1 because of the wider sustainability benefits to the community that outweigh flood risk and in order to fully demonstrate those sustainability aspects, a Sustainability Assessment has been undertaken of all the sites. Where sites are wholly or partly located in areas where there are other sources of flooding, a site-specific flood risk assessment will be required at planning application stage. For the individual Site applications, a sequential approach to development within the site, Part 2 of the Exception test and the use of Sustainable Drainage Systems will be necessary to avoid and mitigate any impact. Part 2 of the Exception Test requires the development to be safe, and this will need to be demonstrated in a Flood Risk Assessment. There has been extensive positive discussions with the EA and HDC on the mitigation required to make the scheme safe for its lifetime (which is a key element of the exception test). The key mitigation approach of design and finished floor levels, have been agreed and both have been addressed in this document and in the revised policy wording.
- 6.8 A flood risk assessment will be required to support planning applications for the proposed allocations and any layout should follow the sequential approach to ensure the most vulnerable uses are placed in the lowest flood risk zone on the site.

# APPENDIX 1



Figure 1: Map of all sites considered in the site assessment (Source: AECOM)

## **ANNEX 1**

**This Annex is in response to comments made at Reg.14 pre submission consultation in order to demonstrate the sequential test has been passed and HDC state it is appropriate.**

### **Background**

This statement seeks to address the comments made at Regulation 14 on the Draft Submission Plan in relation to the sequential test. The EA and HDC in their Reg.14 comments have expressed concerns in regards to Riverside and this statement is intended to address these.

The sequential test methodology has been applied in accordance with the requirements of the National Planning Policy Framework and support the sequential, risk-based selection of sites within the draft Plan, through application of the Sequential and Exception Tests.

Paragraph 101 of the 2012 NPPF (158 of the 2018 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 probability of flooding.’

In seeking to identify land for development, the Qualifying Body has undertaken a comprehensive Site Assessment process via AECOM which involved the appraisal of 9 sites which were considered for potential housing. Each site was considered against the same set of criteria, one of which considered the potential of the site to be at risk from flooding ‘Riverside Caravan Park’. The results of this assessment are set out in the Site Assessment Report. This process identified which sites had the lowest probability of flooding, and therefore formed the initial stage of the sequential test process and is referenced in the Sequential Test Report.

Some of these alternative sites in FZ1 were rejected during the Site Assessment process as a result of impacts on other sustainable development objectives or not policy compliant. These included issues such as the impact on other environmental constraints such as impact on listed building, TPOs and access constraints.

Paragraph 102 of the NPPF 2012 (159 in the 2018 update) then sets out that if development is not consistent with wider sustainability objectives it may be necessary to apply the exception test. This has therefore been undertaken for the Riverside site as set out in the Sequential Test report and was undertaken.

### **Process**

The parish has considered all available sites outside flood zones first and with the exception of Church Farm have allocated them. All the sites have been screened to establish their level of flood risk. For any sites screened in, consideration has been given to whether the development can be accommodated on sites with a lower flood risk and if not, the Exception Test has then been applied. The application of the Sequential Test and Exception Test has been informed by the Strategic Environmental Assessment/ Sustainability Appraisal (SEA/SA) and the AECOM Site Assessment report 2018 which accompanies the Upper Beeding Neighbourhood Development Plan.

The Sites which did not pass the Sequential Test (ST) were screened in and further assessed.

Where sites were 'screened in' they have been further considered in order to direct development to sites or areas at least risk of flooding and the following two questions asked:

- Can the development be relocated to alternative locations with a lower risk of flooding?
- Can the more sensitive development proposed be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?

Table 3 of the Sequential Test Report shows the analysis of this screening.

## Result

Table 5.11 of the Sequential Test Report shows the sequential approach to developments being allocated.

The Land east of Pound Lane, Greenfield, Oxcroft Farm and Riverside Caravan Park are allocated based on the results of the SEA/SA which looks at the environmental, social and economic impact of the sites. The allocation of these sites have many benefits to the community. It is assumed that Part 1 of the Exception test would be passed for the portions of the Sites which are outside Flood zone 1 because of the wider sustainability benefits to the community that outweigh flood risk and demonstrate those sustainability aspects, as shown in the Sustainability Assessment of all the sites.

Where sites are wholly or partly located in areas where there are other sources of flooding, a site-specific flood risk assessment will be required at planning application stage. For the planning applications, a sequential approach to development within the sites, Part 2 of the Exception test and the use of Sustainable Drainage Systems will be necessary to avoid and mitigate any impact. Part 2 of the Exception Test requires the development to be safe, and this will need to be demonstrated through a site specific Flood Risk Assessment (FRA).

The benefits of developing these sites are very much in-keeping with the NPPF and indeed the ethos of Neighbourhood Planning which is based on the SEA/SA outweighs the presumption against locating what is classed as "more vulnerable" developments in Flood Zone 2 and 3.

Upper Beeding is very constrained and there is limited scope for development as available land is in short supply.

Nine sites have been presented but with the exception of Church Farm adjacent to Caravan Park (Site 7 AECOM Site Assessment report Feb 2018) all sites have been considered for allocation (discounted on grounds of deliverability – access, listed buildings, TPOs and SNCI). The alternative sites could also result in some significant negative sustainability effects relating to landscape character.

Riverside is considered to be appropriate as it is providing much needed local sheltered housing which demonstrates the sustainability benefits outweigh the risks of locating development within a flood zone.

## Conclusion and Recommendation

The key issues for delivery of any site allocation of ST sites will be Design and Access, therefore, any emerging policy should explicitly state delivery of access should be safe and necessary mitigation provided. The Design, size and massing of the scheme needs to be accommodating to ensure appropriate finished floor levels as set out in the FRA are met for the whole allocation.

The policy in the submission plan has been updated to require the appropriate design and includes the provision of safe access to reflect the EA comments. This criterion based policy will also requires appropriate finished floor levels, a site specific flood risk assessment (SFRA) which demonstrates 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, will reduce flood risk overall. Consideration should also be made to employing flood prevention construction methods as part of the policy requirement.

As part of addressing the Reg. 14 comments, the developer of the Riverside site has taken the necessary surveys and produced proposed design details which meets or exceeds the EA's requirements including appropriate finished floor levels and also addresses safe access to the site.

The combination of this report including this Annex, the revised policy in the Submission Plan and the proposals by the developer, all satisfy the Sequential and Exceptions test has been passed. Allocation of the Riverside site provides wider sustainability benefits to the community that outweigh flood risk and the developer proposals demonstrate 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, will reduce flood risk overall.