

**Sequential and Exception Test for the
Proposed Submission Adur Local Plan
2014**

October 2014



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1. Introduction

This paper sets out the Sequential Test and Exception Test for the proposed development allocations identified in Adur District Council's Proposed Submission Local Plan 2014. Following the steps outlined in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance, the sequential approach is designed to ensure that sites at little or no risk of flooding are developed in preference to sites at higher risk of flooding.

The paper is split into three sections:

- Part 1 provides information about the allocations including flood risk, flood defences, proposed and existing uses and the vulnerability classification related to these uses.
- Part 2 sets out the Sequential Test for each location;
- Part 3 sets out the Exception Test for developments/sites located within Flood Zone 3.

2. Context and Background

Due to Adur's coastal location and the tidally influenced River Adur running through the centre of the district, large areas of the district are currently at high risk of flooding from tidal and, to a lesser extent, fluvial sources. There is also some degree of flood risk from the Teville Stream catchment to the west of the district. In addition to the tidal and fluvial risks, groundwater and surface water flooding present further risk to substantial parts of the district.

Following ongoing consultation on the Adur Local Plan and the gathering of relevant evidence, the following strategic allocations have been selected for inclusion within the Proposed Submission Adur Local Plan 2014:

- West Sompting (Sompting Fringe & Sompting North) – 480 new dwellings (comprised of 400 new dwellings at Sompting Fringe and 80 new dwellings and a community orchard/growing space at Sompting North);
- New Monks Farm, Lancing - 450-600 new dwellings, approximately 10,000sqm of employment-generating floorspace, a new school, community uses, a country park and recreation facilities;
- Shoreham Harbour – 1100 new dwellings, approximately 16,000sqm of employment generating floorspace, community uses, and ancillary small scale retail and leisure; and
- Shoreham Airport, Lancing – approximately 15,000sqm of employment generating floorspace.

In addition to the above strategic allocations, a number of smaller sites have been identified to meet housing and employment needs. These are shown below. It should be noted that many of these sites are included in the

Council's Strategic Housing Land Availability Assessment which identifies sites capable of accommodating 6 or more dwellings

- Ropetackle North, Shoreham-By-Sea – Proposed residential, hotel, office and ancillary retail uses
- Adur Civic Centre, Ham Road, Shoreham-By-Sea – Proposed mixed use development (including residential)
- Pond Road, Shoreham-By-Sea – Proposed residential and community uses
- Police Station site, Ham Road, Shoreham-By-Sea – Proposed mixed use development including retail
- Eastbrook Allotments, Southwick – Proposed residential, employment, education/training and allotment uses
- Land to West of Highview, Mount Way, Lancing – Proposed residential uses
- Lancing Manor Filling Station, Lancing – Proposed residential uses
- Land at Northbourne Medical Centre, Upper Shoreham Road, Shoreham-By-Sea
- Land at Southlands Hospital, Upper Shoreham Road, Shoreham-By-Sea
- Land at Eastbrook Primary School, Manor Hall Road, Southwick

With regard to residential development in the district, it should be noted that all the identified greenfield and brownfield sites within Adur provide a total of 3488 - 3638 new dwellings up to 2031. This is less than the objectively assessed locally generated housing need of approximately 3600 to 4800 dwellings. The upper end of this objectively assessed housing figure is not considered achievable due to a number of constraints within the district including flood risk and landscape constraints. As a result, there is not a large variety of sites to choose from in Adur – every site that is potentially deliverable and would not have unacceptable environmental, economic or social impacts is being put forward in the Adur Local Plan Proposed-Submission Version 2014 in order to try and meet objectively assessed needs as far as is possible. It is important that this Sequential Test is viewed in this context.

As part of the Rivers Arun to Adur Flood and Erosion Management Strategy 2010-20, the Environment Agency are currently progressing the Shoreham Adur Tidal Walls Scheme which aims to improve flood defences along the east and west banks of the River Adur. The Environment Agency has now received technical approval for the project and has secured funding to undertake the design phase of the scheme. Subject to continued funding for the scheme, an indicative completion date for the tidal walls is 2017. It is important to note that Shoreham Airport, which is currently designated as flood zone 3b (functional floodplain), would be re-designated as flood zone 3a (high probability) following construction of the tidal walls. This has been reflected in the sequential test.

The following table outlines the proposed development allocations and SHLAA sites being taken forward through the Adur Local Plan; the associated flood risk with each site; existing flood defences (where appropriate); and the

existing uses as well as proposed new uses with the associated flood vulnerability classification for each use.

Table 1: Analysis of potential Local Plan sites/allocations

Please also refer to the maps in appendix 2 to see the location of each site.

Site/allocation	Flood Zone (present day)	Change to Flood Zone following completion of proposed Adur tidal walls	Existing Flood Defences and protection Afforded	Existing Uses (with flood vulnerability classification)	Proposed New Uses (with flood vulnerability classification)
New Monks Farm	Predominantly flood zone 3a with parts in flood zone 1 and 2	No change	Formal defences along the River Adur and the coastline	Small scale residential (More Vulnerable) Agriculture (Less Vulnerable) Equestrian development (Less Vulnerable)	Residential (More Vulnerable) Community (More Vulnerable) School (More Vulnerable) Employment (Less Vulnerable) Open Space (Water-Compatible/Less Vulnerable)
Shoreham Airport	Predominantly flood zone 3b with parts in flood zone 1, 2 and 3a	Parts of site currently designated as flood zone 3b will change to 3a	Formal defences along the River Adur and the coastline	Aviation-related development (Less Vulnerable) Employment (Less Vulnerable) College (More Vulnerable) Eating and drinking (Less Vulnerable) Fire Training / Station (Highly Vulnerable) Museum (Less Vulnerable) Emergency Services (More Vulnerable) Leisure (Less Vulnerable)	Aviation-related development (Less Vulnerable) Employment (Less Vulnerable)

Site/allocation	Flood Zone (present day)	Change to Flood Zone following completion of proposed Adur tidal walls	Existing Flood Defences and protection Afforded	Existing Uses (with flood vulnerability classification)	Proposed New Uses (with flood vulnerability classification)
Sompting Fringe	Predominantly flood zone 1 with parts in flood zone 2, 3a and 3b	N/A	N/A	Agriculture (Less Vulnerable) Equestrian development (Less Vulnerable) Open Land (Water-Compatible)	Residential (More Vulnerable) Open Space (Water-Compatible/Less Vulnerable)
Sompting North	1	N/A	N/A	Agriculture (Less Vulnerable)	Residential (More Vulnerable) Open Space (Water-Compatible/Less Vulnerable)
Shoreham Harbour	1, 2 and 3a N.B. Parts of Harbour flood in 1:20 Annual Exceedence Probability (AEP) but do not act as functional floodplain	N/A	Formal defences along the River Adur and the coastline	Residential (More Vulnerable) Community (More Vulnerable) Employment (Less Vulnerable) Storage (Less Vulnerable) Eating and Drinking (Less Vulnerable) Retail (Less Vulnerable) Port Associated uses (Water-Compatible) Sewage Treatment (Water Compatible)	Residential (More Vulnerable) Community (More Vulnerable) Employment (Less Vulnerable) Storage (Less Vulnerable) Eating and Drinking (Less Vulnerable) Retail (Less Vulnerable) Port Associated uses (Water-Compatible) Sewage Treatment (Water Compatible)
Ropetackle North, Shoreham-By-Sea	3b	Parts of site currently designated as flood zone 3b will change to 3a	Raised embankment along River Adur	Employment (Less Vulnerable)	Residential (More Vulnerable) Employment (Less Vulnerable) Retail (Less Vulnerable)
Pond Road, Shoreham-By-Sea	1	N/A	N/A	Residential (More Vulnerable) Community (More Vulnerable)	Residential (More Vulnerable) Community (More Vulnerable)

Site/allocation	Flood Zone (present day)	Change to Flood Zone following completion of proposed Adur tidal walls	Existing Flood Defences and protection Afforded	Existing Uses (with flood vulnerability classification)	Proposed New Uses (with flood vulnerability classification)
Adur Civic Centre, Ham Road, Shoreham-By-Sea	3a	N/A	Formal defence along River Adur and coastline	Employment (Less Vulnerable)	Residential (More vulnerable) Retail (Less vulnerable)
Police Station site, Ham Road, Shoreham-By-Sea	1	N/A	N/A	Employment (Less Vulnerable)	Residential (More Vulnerable) Retail (Less Vulnerable) Employment (Less Vulnerable)
Eastbrook Allotments, Southwick	1	N/A	N/A	Allotments (Water compatible)	Residential (More Vulnerable) Education/training facilities (More Vulnerable) Employment (Less Vulnerable) Allotments/Open Space (Water Compatible)
Land to West of Highview, Mount Way, Lancing	1	N/A	N/A	Residential garden land (More Vulnerable)	Residential (More Vulnerable)
Lancing Manor Filling Station	1, 2 and 3a (just over half the site is 3a)	N/A	Formal defence along River Adur	Vacant - Last use was car storage (Less Vulnerable)	Residential (More Vulnerable)
Land at Northbourne Medical Centre, Upper Shoreham Road, Shoreham-By-Sea	1	N/A	N/A	Vacant – Last use was a medical centre (More vulnerable)	Residential (More Vulnerable)
Land at Southlands Hospital, Upper Shoreham Road, Shoreham-By-Sea	1	N/A	N/A	Hospital (More Vulnerable)	Residential (More Vulnerable)
Land at Eastbrook Primary School, Manor Hall Road, Southwick	1	N/A	N/A	Vacant – last use was education (More Vulnerable)	Residential (More Vulnerable)

3. The Sequential Test

Government guidance in the NPPF and the Planning Practice Guidance does not intend to prevent all development on sites at risk of flooding and accepts that some form of development may have to take place on such sites. Due to the obvious risks of developing on land liable to flooding, the intention is to minimise risks to people and property.

The overall aim of decision-makers should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, decision-makers should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of sites in Flood Zone 3, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

Within each Flood Zone, new development should be directed first to sites at the lowest probability of flooding and the flood vulnerability of the intended use matched to the flood risk of the site i.e. higher vulnerability uses should be located on parts of the site at lowest probability of flooding.

The Adur Local Plan Proposed Submission Draft 2014 includes development allocations in Flood Zones 1, 2 and 3. The following tests consider those locations in sequence.

1. Are the proposed sites/allocations/broad locations in Flood Zone 1 - Low Probability of flood risk?	
Yes	<p>Proposed allocations/sites wholly in Flood Zone 1 include:</p> <ul style="list-style-type: none"> • Pond Road • Sompting North • Shoreham Police Station Site • Eastbrook Allotments • Land to West of Highview • Land at Northbourne Medical Centre • Land at Southland Hospital • Land at Eastbrook Primary School <p>Proposed allocations/sites predominantly in Flood Zone 1 include:</p> <ul style="list-style-type: none"> • Sompting Fringe <p>For areas listed above that are wholly within Flood Zone 1, the allocation is appropriate in that flood zone and there is no need to proceed with the Sequential Test for these areas.</p>

<p>No</p>	<p>For sites/allocations/broad locations wholly or partly in Flood Zones 2 and 3 proceed to question 2.</p> <p>Relevant allocations include:</p> <ul style="list-style-type: none"> • New Monks Farm • Shoreham Airport • Shoreham Harbour • Ropetackle North • Civic Centre • Sompting Fringe • Lancing Manor Filling Station
<p>2. Could the following proposed sites/allocations in Flood Zones 2 and 3 alternatively be located in Flood Zone 1 Low Probability of flood risk?</p> <ul style="list-style-type: none"> • New Monks Farm • Shoreham Airport • Shoreham Harbour • Ropetackle North • Civic Centre • Sompting Fringe • Lancing Manor Filling Station 	
<p>No</p>	<p>a) Identify alternative sites/locations that were considered and explain why they were dismissed:</p> <p>The table in appendix 1 provides details of the other strategic sites that were considered as allocations for development through the Local Plan and the reasons for their dismissal. The sites within flood zone 1 that have been dismissed are as follows:</p> <ul style="list-style-type: none"> • Land south of Upper Brighton Road, Sompting Village • Land at Mill Hill, Shoreham-By-Sea <p>The three other alternative sites that were dismissed were either within flood zones 3a or 3b and are therefore not sequentially preferable to the sites being considered as part of this sequential test.</p> <p>It is clearly demonstrated that there are no reasonable alternatives to the sites considered in this sequential test as the amount of land for larger-scale development in the district is limited. This is primarily a result of the geography of the area with the coast to the south and South Downs National Park to the north.</p> <p>The Spatial Strategy of the Adur Local Plan is to direct as much development as possible to within the Built Up Area Boundary. However, sites within the</p>

	<p>Built Up Area Boundary would only provide a limited amount of housing and other necessary development. A significant amount of peripheral greenfield land will need to be developed to try, as far as is possible, to meet objectively assessed needs. It is accepted that land is too constrained in the district to meet the full identified housing needs of the district.</p> <p>b) Explain why the proposal cannot be redirected to 'Zone 1':</p> <p>Greenfield sites:</p> <p><i>New Monks Farm</i> There are no alternative sites in the district that could provide this level of development. Development in this location would make a significant contribution towards meeting Adur's housing and employment needs. Development of the scale proposed would also help to provide a new access from/to the A27 serving new development at New Monks Farm and Shoreham Airport, as well as a new school and other community facilities. More vulnerable uses should be directed away from areas of higher risk. This would be considered in more detail in a site-specific Flood Risk Assessment at the detailed design/planning application stage.</p> <p><i>Sompting Fringe</i> Development in this location could contribute towards meeting Adur's housing needs and deliver a critical mass of development to enable significant infrastructure delivery without significantly compromising the integrity of the Sompting/Lancing–Worthing Local Green Gap. Although small parts of the site are within flood zones 2, 3a and 3b, the vast majority of the site is within flood zone 1 and the site is therefore preferable from a flood risk perspective than a number of the other sites being considered. All new development at Sompting Fringe will be provided within Flood Zone 1.</p> <p>Brownfield Sites:</p> <p><i>Shoreham Airport</i> There is no alternative location for this use as a long-established general aviation airport. Shoreham Airport is one of the few high quality employment sites within Adur and new employment development would provide a significant boost to Adur's economy.</p> <p>This Airport site is currently designated as flood zone 3b but the Shoreham Adur Tidal Walls scheme, when implemented, will change the designation to flood zone 3a. Therefore any new development in this location could only potentially come forward once the tidal walls scheme is implemented.</p> <p>It should be noted that there are very few sites in the district on which to provide new employment opportunities. What few available sites there are in the district are proposed to meet housing targets, other than Shoreham Harbour and New Monks Farm which also propose employment generating floorspace in addition to housing. However, It is not considered that Shoreham Harbour and New Monks Farm alone could provide the regeneration benefits required to improve Adur's economy or meet the</p>
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forecast demand for employment in the district. The Airport is an existing well-established employment area that is an attractive location for business.

Shoreham Harbour

This site offers an opportunity for the regeneration of this part of the Sussex Coast through the provision of new housing, employment opportunities, community facilities etc. This will bring with it social, environmental and economic benefits for the local area. The consolidation of the existing port forms an integral part of the regeneration proposals for the area, and this is essentially location specific to the port area. The site is located within flood zones 1, 2 and 3a (some of which flood in a 1:20 AEP but do not act as functional floodplain). Therefore there may be opportunities to direct some of the proposed 'more vulnerable' development away from high risk areas.

Ropetackle North

This site is one of the few available and deliverable brownfield sites in a generally sustainable location near the edge of Shoreham town centre. The site could help meet Adur's housing and employment needs as well as help improve the vitality and viability of Shoreham Town Centre. Development at this site would also contribute to the tidal wall defences proposed by the EA and such defences would reduce flood risk for significant parts of the district.

Civic Centre

This site has been identified for a mix of uses including residential. The site is located within the wider town centre which is an appropriate location for such uses.

Lancing Manor Filling Station

Just under half of this site is located within flood zone 1. There are no alternatives to this site as even when all available and acceptable sites in the district are considered together, they would still not be able to provide enough housing to meet Adur's objectively assessed need.

If the site is in Flood Zone 2 Medium Probability proceed to Question 3.

The following locations are partly within flood zone 2

- New Monks Farm
- Sompting Fringe
- Shoreham Harbour
- Lancing Manor Filling Station

If the site is in Flood Zone 3a High Probability, proceed to Question 4.

The following locations are partly or mainly within flood zone 3a.

- New Monks Farm
- Shoreham Airport
- Shoreham Harbour
- Ropetackle North
- Civic Centre

	<ul style="list-style-type: none"> • Lancing Manor Filling Station <p>The following locations have very small sections within flood zone 3a.</p> <ul style="list-style-type: none"> • Sompting Fringe <p>Note: if the site is located in more than one Flood Zone, it will be necessary to answer Questions 3, 4 and 5 as necessary for each part of the broad location in a different Flood Zone</p>
<p>3. For sites/allocations partly in 'Flood Zone 2 Medium Probability' of flood risk.</p> <ul style="list-style-type: none"> • New Monks Farm • Sompting Fringe • Shoreham Harbour • Lancing Manor Filling Station 	
<p>3a. Are the proposed uses in the 'Water Compatible', 'Less Vulnerable', 'More Vulnerable' or 'Essential Infrastructure' Flood Risk Vulnerability Classifications set out in Para.066 of the Planning Practice Guidance?</p>	
<p>Yes</p>	<p>List the proposed uses in these classifications:</p> <p>New Monks Farm: <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Community Uses • Residential • School <p><u>Less Vulnerable</u></p> <ul style="list-style-type: none"> • Employment <p><u>Water Compatible</u></p> <ul style="list-style-type: none"> • Open Space <p>Sompting Fringe <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential <p><u>Water Compatible</u></p> <ul style="list-style-type: none"> • Open Space <p>Shoreham Harbour <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential • Community Facilities <p><u>Less Vulnerable</u></p> <ul style="list-style-type: none"> • Business • Industrial • Food and drink • Retail <p><u>Water Compatible</u></p> <ul style="list-style-type: none"> • Port Associated Uses

	<ul style="list-style-type: none"> • Sewage Treatment • Leisure and boating facilities • Open Space <p>Lancing Manor Filling Station <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential <p>These proposals are appropriate if located in Flood Zone 2 and there is no requirement to proceed with the Exception Test</p>
No	N/A
<p>3b. Can the more flood sensitive development types ('highly vulnerable' and 'more vulnerable') be directed to parts of the site where the risks are lower for both the occupiers and the premises themselves?</p>	
Yes	<p>Identify how the risks have been reduced:</p> <p><u>Sompting Fringe</u> Since the majority of this site falls within flood zone 1, the 'more vulnerable' uses, in this case residential, could easily be re-directed to areas of lower risk.</p>
No	<p>Explain why the development types cannot be relocated:</p> <p><i>New Monks Farm</i> Only a very small amount of this site is located within flood zones 1 and 2. The majority is located within flood zone 3a. A significant amount of residential development is proposed on this site (for reasons already outlined in the Sequential Test) which could not all be located within flood zones 1 and 2. As a result the majority of development could not be directed to parts of the site where the risks are lower.</p> <p><i>Shoreham Harbour</i> There is a varying degree of flood risk in the western arm section of the Shoreham Harbour regeneration area. It is therefore anticipated that some, but not all, of the more vulnerable uses could be redirected to areas at lower risk of flooding. This will be considered further through development briefs currently being prepared for Shoreham Harbour and the Joint Area Action Plan for Shoreham Harbour.</p> <p><i>Lancing Manor Filling Station</i> Just under half of this site is located within flood zone 1. Although it might be possible for a significant amount of the development to be located within flood zone 1, to located all development within flood zone 1 would not result in an efficient use of land. Some development will inevitably be located in flood zone 3a.</p>
<p>4. For sites/allocations in Zone 3a - High Probability of flood risk</p>	

Locations partly in Flood Zone 3a include:

- Shoreham Harbour
- Sompting Fringe (as explained in question 3b, all development at this site could be located within flood zone 1)

Locations mainly or entirely within Flood Zone 3a include:

- New Monks Farm
- Civic Centre
- Lancing Manor Filling Station

Locations currently within Flood Zone 3b that would be redesignated as Flood Zone 3a following construction of the Adur Tidal Walls

- Shoreham Airport
- Ropetackle North

4a. Can the development proposal be redirected to Flood Zone 2 Medium Probability?

No	<p>Explain why the development types cannot be relocated to Flood Zone 2:</p> <p>As explained above, a number of sites available to help meet Adur's development needs fall within flood zones 3a due to the district's coastal location and the River Adur. Sompting Fringe is predominantly located in flood zone 1 but would not provide enough housing to meet Adur's housing needs. Shoreham Harbour has some land within flood zones 1 and 2 but this land is not enough to provide the level of housing required or a deliverable scheme.</p> <p>Proceed to question 4b</p>
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4b. Are the development proposals in the 'Water Compatible' or 'Less Vulnerable' classifications?

Yes	<p>List the proposed uses in these classifications:</p> <p>New Monks Farm <u>Less Vulnerable</u></p> <ul style="list-style-type: none">• Employment <p><u>Water Compatible</u></p> <ul style="list-style-type: none">• Open Space <p>Shoreham Airport <u>Less Vulnerable</u></p> <ul style="list-style-type: none">• Airport uses and associated employment <p>Shoreham Harbour</p>
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	<p><u>Water Compatible</u></p> <ul style="list-style-type: none"> • Port Associated Uses • Sewage Treatment • Leisure & boating • Open Space <p><u>Less Vulnerable</u></p> <ul style="list-style-type: none"> • Employment • Food and drink • Retail <p>Ropetackle North</p> <p><u>Less Vulnerable</u></p> <ul style="list-style-type: none"> • Employment • Retail <p>Civic Centre</p> <p><u>Less Vulnerable</u></p> <ul style="list-style-type: none"> • Potential retail or employment uses <p>These proposals are appropriate in Flood Zone 3a and there is no requirement to proceed with the Exception Test.</p>
<p>No</p>	<p>List the proposed uses that aren't in these classifications:</p> <p>New Monks Farm</p> <p><u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential • Community uses • School <p>Shoreham Harbour</p> <p><u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential • Community uses <p>Ropetackle North</p> <p><u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential • Hotel <p>Civic Centre</p> <p><u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential <p>Lancing Manor Filling Station</p> <p><u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential

	The 'more vulnerable' proposals will only be appropriate within Flood Zone 3a providing they meet the requirements of the Exceptions Test.
4c. Is the development proposal in the 'Highly Vulnerable' classification?	
Yes	N/A
No	No proposals are in the 'Highly Vulnerable' classification
4d. Can the more flood sensitive development use types be directed to parts of the site where the risks are lower for both the occupiers and the premises themselves?	
	<ul style="list-style-type: none"> • Planning policies and guidance, based on the SFRA, will, where possible or practicable, direct the more vulnerable uses within a site away from areas of greater risk. • In all cases it must be demonstrated that an adequate standard of safety can be achieved through a site specific Flood Risk Assessment and will comply with Environment Agency requirements and the Exceptions Test if applicable.
5. For locations in 'Zone 3b The Functional Floodplain'	
<p>Locations within Flood Zone 3b that would be redesignated as Flood Zone 3a following construction of the Shoreham Adur Tidal Walls</p> <ul style="list-style-type: none"> • Shoreham Airport • Ropetackle North <p>Sompting Fringe has a small area within Flood Zone 3b. For further details please see question 3b.</p>	
5a. Can the development proposal be redirected to Zone 2 Medium Probability?	
No	See response to question 4a (Proceed to Question 5b)
5b. Can the development proposal be redirected to Flood Zone 3a High Probability?	
Yes	Redirect the proposal and proceed to Question 4b

	<ul style="list-style-type: none"> • Following completion of the Shoreham Adur Tidal Walls, the only area of Flood Zone 3b will be at Sompting Fringe. However, the majority of this site is within flood zone 1 and development will be directed to the area falling within flood zone 1 as explained earlier in this test. • All non-water compatible development in the district will be located within Flood Zones 1, 2 or 3a (subject to passing the exceptions test where appropriate) in accordance with the National Planning Policy Framework.
No	N/A

4. Summary of Sequential Test

Due to the limited number of sites in the district to help meet Adur’s housing and employment needs, there are very few available sites in the district that are not at risk of flooding.

The most sequentially preferable sites are Pond Road, the Shoreham Police Station site, Eastbrook allotments, Land to West of Highview, Land at Northbourne Medical Centre, Land at Southlands Hospital, Land at Eastbrook Primary School and West Sompting (Sompting Fringe and Sompting North). However, it is estimated that these sites together could only deliver approximately 650-700 dwellings which is significantly less than Adur’s objectively assessed housing need. Although it is accepted that there is insufficient capacity in the district to meet Adur’s full housing need, it is necessary to ensure that every effort has been made to meet this need as far as is practicable and reasonable considering social, economic and environmental issues. Therefore a range of additional sites are required. Although the Civic Centre, Ropetackle North and parts of New Monks Farm and Shoreham Harbour all have a high probability of flooding, it is shown above that they pass the sequential test. Shoreham Airport and Ropetackle North don’t currently pass the sequential test but once the Shoreham Tidal Walls have been constructed, the flood zone for both sites will change to 3a (high probability) which will then allow Shoreham Airport and Ropetackle North to pass the test.

5. Exception Test

Following completion of the sequential test, the following sites require an Exception Test as they all propose 'more vulnerable' residential uses in flood zone 3a:

New Monks Farm
 Shoreham Harbour
 Civic Centre
 Ropetackle North
 Lancing Manor Filling Station

The table below assesses each of the sites against the Sustainability Objectives set out in the Sustainability Appraisal of the Adur Local Plan 2014 in accordance with the guidance for the Exception Test set out in the Planning Practice Guidance.

The scoring for each site has been undertaken as follows:

Green	Consistent with Sustainability Objective
Amber	Potential for conflicts with Sustainability Objective
Red	Significant conflict with Sustainability Objective
	Neutral / No impact

1. Do the development proposals provide wider sustainability benefits to the community that outweigh flood risk?	
1. Increase energy efficiency and encourage the use of renewable energy sources	
Green	New Monks Farm In accordance with policies in the Proposed Submission Adur Local Plan 2014, any new residential development will have to be constructed to a minimum standard Level 4 of the Code for Sustainable Homes, and non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM.
Green	Shoreham Harbour (western arm) In accordance with policies in the Proposed Submission Adur Local Plan 2014, any new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes, and non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM.

Green	<p>Civic Centre</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, any new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes, and non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM.</p>
Green	<p>Ropetackle North</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, any new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes, and non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM.</p>
Green	<p>Lancing Manor Filling Station</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, any new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes, and non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM.</p>
2. Protect and enhance water quality and encourage the sustainable use of water	
Green	<p>New Monks Farm</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes and non-residential development will have to meet 'Very Good' standard under the BREEAM. These standards will include water efficiency measures.</p> <p>Where appropriate, all new development will be required to incorporate Sustainable Drainage Systems (SuDS) (and other measures where necessary) in accordance with policies in the Revised Draft Local Plan.</p> <p>New development must not adversely impact water bodies. Such impacts would conflict with the Water Framework Directive.</p>
Amber	<p>Shoreham Harbour (western arm)</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes and non-residential development will have to meet 'Very Good' standard under the BREEAM. These</p>

	<p>standards will include water efficiency measures.</p> <p>Where appropriate, all new development will be required to incorporate SuDS (and other measures where necessary) in accordance with policies in the Revised Draft Local Plan. New development must not adversely impact water bodies. Such impacts would conflict with the Water Framework Directive.</p> <p>However, given that the regeneration of Shoreham Harbour would involve a significant amount of new waterfront development, there is potential for pollution of the Adur Estuary SSSI if adequate mitigation is not put in place.</p>
Green	<p>Civic Centre</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes and non-residential development will have to meet 'Very Good' standard under the BREEAM. This standard will include water efficiency measures.</p> <p>Where appropriate, all new development will be required to incorporate SuDS (and other measures where necessary) in accordance with policies in the Revised Draft Local Plan.</p> <p>New development must not adversely impact water bodies. Such impacts would conflict with the Water Framework Directive.</p>
Green	<p>Lancing Manor Filling Station</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, new residential development will have to be constructed to a minimum standard of Level 4 of the Code for Sustainable Homes and non-residential development will have to meet 'Very Good' standard under the BREEAM. This standard will include water efficiency measures.</p> <p>Where appropriate, all new development will be required to incorporate SuDS (and other measures where necessary) in accordance with policies in the Revised Draft Local Plan.</p> <p>New development must not adversely impact water bodies. Such impacts would conflict with the Water Framework Directive.</p>
Amber	<p>Ropetackle North</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014, new residential development will have to be constructed to a minimum standard of Level 4 of the Code for</p>

	<p>Sustainable Homes and non-residential development will have to meet 'Very Good' standard under the BREEAM. This standard will include water efficiency measures.</p> <p>Where appropriate, all new development will be required to incorporate SuDS (and other measures where necessary) in accordance with policies in the Revised Draft Local Plan.</p> <p>New development must not adversely impact water bodies. Such impacts would conflict with the Water Framework Directive.</p> <p>The development layout/design at Ropetackle North will need to pay particular attention to this sustainability objective given its close proximity to the River Adur SSSI.</p>
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	
<p>General</p> <p>The spatial strategy for the Adur Local Plan seeks to make the most efficient use of brownfield land. All of the following five sites have been considered for development in accordance with the spatial strategy. It should be noted that the greenfield sites being proposed for development are not alternatives to brownfield sites but are in addition to them.</p>	
Green	<p>New Monks Farm</p> <p>This site is greenfield. However, its selection has been informed by the Spatial Strategy. In order to try and meet Adur's objectively assessed housing needs, it is recognised that some development will have to take place on greenfield sites where such demand cannot be met within the Built-Up Area.</p>
Green	<p>Shoreham Harbour</p> <p>This is a large brownfield site that seeks to make more efficient use of a large area of land.</p>
Green	<p>Civic Centre</p> <p>This is a brownfield site and is considered an efficient use of land.</p>
Green	<p>Ropetackle North</p> <p>This is a brownfield site and is considered an efficient use of land.</p>
Green	<p>Lancing Manor Filling Station</p> <p>This is a brownfield site and is considered an efficient use of land.</p>
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats	

Amber	<p>New Monks Farm</p> <p>There are areas of local biodiversity importance on the site including a number of BAP habitats. Development must be sensitive to biodiversity in the area and provide net gains in biodiversity where possible. This site provides opportunities to enhance biodiversity through the creation of a planned network of green spaces.</p>
Amber	<p>Shoreham Harbour (western arm)</p> <p>There are a number of sensitive habitats that could be negatively impacted through the regeneration of Shoreham Harbour. However, the Harbour also presents opportunities to increase biodiversity in the long term through a planned network of green spaces.</p>
Green	<p>Civic Centre</p> <p>This site is brownfield and has no significant biodiversity value. Opportunities to improve biodiversity on the site through new development will be sought.</p>
Amber	<p>Ropetackle North</p> <p>This is a brownfield site adjacent to the Adur Estuary SSSI. Therefore there is some potential for conflict with this objective if adequate mitigation is not put in place. However, new development can provide opportunities to improve biodiversity.</p>
Amber	<p>Lancing Manor Filling Station</p> <p>This is a brownfield site and although it is unlikely to have any significant biodiversity value, such information is not currently available. However, new development can provide opportunities to improve biodiversity.</p>
5. Protect and enhance the historic environment including landscapes, townscapes, parks, buildings and archaeological heritage	
Amber	<p>New Monks Farm</p> <p>This site is greenfield and is located within the Local Green Gap between the settlements of Shoreham-By-Sea and Lancing. This gap is part of the historic character of Adur. However, the impact of development within the gap can be mitigated to some degree.</p>

Amber	Shoreham Harbour (western arm) The Riverside Conservation Area (including a Grade II Listed Building) is located within the Harbour area. Any new development adjacent to this area would need to be designed sympathetically.
Green	Civic Centre Development at the Civic Centre would not conflict with the aims of this objective as the site is located a reasonable distance from Shoreham-By-Sea Conservation Area.
Amber	Ropetackle North Development at Ropetackle North would need to be designed sensitively so as to not adversely affect the setting of the River Adur which is part of the historic character of the district. However, new development provides opportunities to improve the appearance of the site by replacing the existing industrial area.
Green	Lancing Manor Filling Station This site is not located close to any areas of historic value and as a result, development at this site would be consistent with this sustainability objective.
6. Protect and enhance the countryside	
Amber	New Monks Farm The 'Landscape and Ecological Survey of Key Sites within the Adur District' (2012) states that the site has a relatively low landscape sensitivity and is less visible in sensitive views. However, the study recognises that the fields to the east of Mash Barn, which form part of the central landscape of the gap, make an important contribution to its openness and 'greenness'. Mitigation measures such as strategically placed blocks of woodland would help to reduce the impact on the countryside.
Green	Shoreham Harbour (western arm) Shoreham Harbour is a brownfield site within the urban area of the district and would have no negative impacts on the countryside.

Green	<p>Civic Centre The Civic Centre is a brownfield site close to Shoreham town centre and would have no negative impacts on the countryside.</p>
Green	<p>Ropetackle North Ropetackle North is a brownfield site close to Shoreham town centre. However, it is also located adjacent to the River Adur which forms part of the Local Green Gap between Shoreham and Lancing. New development on the site must be designed sensitively to minimise any impacts on the gap. However, new development provides opportunities to improve the appearance of the site by replacing the existing industrial area.</p>
Amber	<p>Lancing Manor Filling Station Lancing Manor is located at the foot of the South Downs National Park. The site is relatively small and is unlikely to have a significant impact on the National Park but the design of any development on the site needs to take account of its location adjacent the South Downs.</p>
7. Protect and enhance public open space / green infrastructure and accessibility to it	
Amber	<p>New Monks Farm This site is large and its development would provide opportunities for a significant amount of new accessible open space / green infrastructure provision. As part of the proposal a new country park is proposed within the gap as well as informal recreation facilities.</p> <p>However, it should be noted that the site is greenfield and a significant amount of development would take place on an existing area of green infrastructure within the Local Green Gap.</p>
Amber	<p>Shoreham Harbour (western arm) There are limited opportunities to provide significant amounts of open space at Shoreham Harbour but there is still potential for development to make a contribution to the green infrastructure network through a riverside walkway, green roofs, etc. Contributions would also be sought to improve nearby open space provision.</p>
Amber	<p>Civic Centre There are limited opportunities to provide significant amounts of open space on site. However, there is potential for new development to make a contribution to the green infrastructure network through green roofs etc. Contributions may be sought to improve nearby open space provision subject to the amount of residential development provided on site.</p>

Amber	<p>Ropetackle North</p> <p>There are limited opportunities to provide significant amounts of open space at Ropetackle North but there is significant potential for the development to contribute to the network of green links, particularly along the River Adur, as well as make contributions towards the improvement of nearby open space provision.</p>
Amber	<p>Lancing Manor Filling Station</p> <p>There are limited opportunities to provide significant amounts of open space on site. However, there is potential for new development to make a contribution to the green infrastructure network through green roofs etc. Contributions may be sought to improve nearby open space provision subject to the amount of residential development provided on site.</p>
8. Reduce pollution and the risk of pollution to air, land and water.	
Amber	<p>New Monks Farm</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014 and other national guidance, any new development at the site should minimise the potential of pollution migrating to air, land and water.</p> <p>Despite the relatively close proximity of Shoreham Airport, the site falls outside of the airport's noise contours so there are unlikely to be any significant noise issues in that regard. The northern part of the site is adjacent to the A27 which may have potential noise impacts on any new dwellings on the site.</p> <p>Sustainable transport measures will have to be implemented on site to reduce car use which is a major contributor to air pollution.</p>
Amber	<p>Shoreham Harbour (western arm)</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014 and other national guidance, any new development at Shoreham Harbour should minimise the potential of pollution migrating to air, land and water. There are a number of sites at the Harbour which have potential for land contamination. New development would provide an opportunity to remediate such contamination.</p> <p>It is essential that improved sustainable transport measures are in place to reduce impacts on air quality, particularly in relation to the Air Quality Management Area nearby at Shoreham town centre.</p> <p>Development needs to be designed carefully to ensure that there are no conflicts between existing port/industrial uses at</p>

	<p>the Harbour and new residential development. However, given that the regeneration of Shoreham Harbour would involve a significant amount of new waterfront development, there is potential for pollution of the Adur Estuary SSSI if adequate mitigation is not put in place.</p>
Amber	<p>Civic Centre In accordance with policies in the Proposed Submission Local Plan 2014 and other national guidance, any new development at the site should minimise the potential of pollution migrating to air, land and water.</p> <p>The site is located at the eastern end of the town centre and is well connected to public transport and services. Therefore its location should help reduce the need to travel by car.</p> <p>There is potential for retail floorspace to be proposed on this site which can generate a significant amount of car movements. Various measures will need to be implemented within the design to encourage forms of transport other than the car.</p> <p>The site is located close to the Shoreham-By-Sea Air Quality Management Area (AQMA) so is particularly sensitive with regard to air quality.</p>
Green	<p>Ropetackle North Any new development at the site should minimise the potential of pollution migrating to air, land and water in accordance with policies in the Proposed Submission Adur Local Plan 2014 and other national guidance.</p> <p>Given that the site is located on the edge of the town centre it is well connected to public transport and services and its location should reduce the need to travel by car.</p> <p>The site currently has potential to be contaminated so new development could provide an opportunity to remediate any contamination.</p> <p>New development will need to be carefully designed to ensure that it has no negative impacts on the River Adur SSSI.</p> <p>The site is located close to the Air Quality Management Area on Shoreham High Street so opportunities to minimise traffic movements and promote sustainable forms of transport will need to be taken.</p>

Amber	<p>Lancing Manor Filling Station</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan 2014 and other national guidance, any new development at the site should minimise the potential of pollution migrating to air, land and water.</p> <p>The site is not located particularly close to services and facilities being on the edge of the Built Up Area so the development is likely to generate more car trips than a more central site.</p>
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	
Amber	<p>New Monks Farm</p> <p>A significant amount of the site is located within Flood Zone 3a so any new development will have to be designed to minimise flood risk in the present and the future. The site also has significant surface water and groundwater issues which would also need to be mitigated. Additionally, measures to deal with other issues connected with climate change such as water use and availability, low carbon emissions, biodiversity enhancements etc. will have to be incorporated into new development. The Environment Agency are also currently progressing the Shoreham Tidal Walls Scheme which will improve the flood defences along the east and west bank of the river and will help to minimise the risk of flooding on the site both in the short and long term.</p>
Amber	<p>Shoreham Harbour (western arm)</p> <p>Parts of the site are within Flood Zone 3a and Flood Zone 2 so new development at the Harbour will have to take into account flood risk in the present and the future. There are also potential issues relating to groundwater flooding on site. Additionally, measures to deal with other issues connected with climate change such as water use and availability, low carbon emissions, biodiversity enhancements etc. will have to be factored into the development. Existing defences at the Harbour are likely to need improvement to enable development to take place.</p>
Amber	<p>Civic Centre</p> <p>The site is located within Flood Zone 3a so new development will have to take into account flood risk in the present and the future. There are also surface water and potential groundwater flooding issues on site. Additionally, measures to deal with other issues connected with climate change such as water use and availability, low carbon emissions, biodiversity enhancements etc. will have to be factored into the development.</p>

Amber	<p>Ropetackle North The site is currently located within Flood Zone 3b so new development will have to take into account flood risk in the present and the future. There are also surface water and potential groundwater flooding issues on site. Additionally, other issues connected with climate change such as water use and availability, low carbon emissions, biodiversity enhancements etc. will have to be incorporated into new development.</p> <p>Development at Ropetackle North would provide new flood defences as part of the wider Shoreham Tidal Walls scheme being progressed by the Environment Agency.</p>
Amber	<p>Lancing Manor Filling Station A significant amount of the site is located within Flood Zone 3a so any new development will have to be designed to minimise flood risk in the present and the future. The site also has potentially significant groundwater issues which may also need to be mitigated. Additionally, measures to deal with other issues connected with climate change such as water use and availability, low carbon emissions, biodiversity enhancements etc. will have to be incorporated into new development. The Environment Agency are also currently progressing the Shoreham Tidal Walls Scheme which will improve the flood defences along the east and west bank of the river and will help to minimise the risk of flooding on the site both in the short and long term.</p>
10. To improve health and wellbeing and reduce inequalities in health	
Green	<p>New Monks Farm Due to its location within the Shoreham/Lancing Local Green Gap, new development at New Monks Farm provides opportunities for significant amounts of new open space/green infrastructure (including a country park) to be provided which will have health benefits for new and existing residents in the surrounding area.</p> <p>New development will need to be of a high quality design that provides a good living and working environment, beneficial for both physical and mental health.</p>

Amber	<p>Shoreham Harbour (western arm) Development at Shoreham Harbour will provide opportunities to improve green links within the Harbour itself and the wider area. This is likely to encourage more people to walk and cycle recreationally, which can have benefits for both health and wellbeing. However, given the densities required to create a viable scheme at the Harbour, it is likely that opportunities to provide new open spaces within the Harbour area will be limited.</p> <p>The regeneration of the Harbour aims to promote a greater use of the coast and as a result it is likely that the development would encourage more people to visit the coast and use it for recreational purposes.</p> <p>New and improved recreational facilities are proposed as part of the Harbour regeneration and these facilities would be beneficial to the health and wellbeing of new and existing residents.</p> <p>New development will need to be of a high quality design that provides a good living and working environment, beneficial for both physical and mental health.</p>
Amber	<p>Civic Centre Any new development on site will need to be of a high quality design that provides a good living and working environment, beneficial for both physical and mental health.</p>
Amber	<p>Ropetackle North Any new development on site will need to be of a high quality design that provides a good living and working environment, beneficial for both physical and mental health.</p> <p>New development on site provides opportunities to increase access to and along the River Adur which would have health benefits.</p>
Amber	<p>Lancing Manor Filing Station Any new development on site will need to be of a high quality design that provides a good living and working environment, beneficial for both physical and mental health.</p>
11. To reduce crime, the fear of crime and antisocial behaviour	

Green	New Monks Farm High quality design, as required by policies in the Proposed Submission Adur Local Plan 2014, can, to some extent, help to reduce crime, the fear of crime and anti-social behaviour through designing out elements that can contribute to crime and providing natural surveillance.
Green	Shoreham Harbour (western arm) High quality design, as required by policies in the Proposed Submission Adur Local Plan 2014, can, to some extent, help to reduce crime, the fear of crime and anti-social behaviour through designing out elements that can contribute to crime and providing natural surveillance.
Green	Civic Centre High quality design, as required by policies in the Proposed Submission Adur Local Plan 2014, can, to some extent, help to reduce crime, the fear of crime and anti-social behaviour through designing out elements that can contribute to crime and providing natural surveillance.
Green	Ropetackle North High quality design, as required by policies in the Proposed Submission Adur Local Plan 2014, can, to some extent, help to reduce crime, the fear of crime and anti-social behaviour through designing out elements that can contribute to crime and providing natural surveillance.
Green	Lancing Manor Filling Station High quality design, as required by policies in the Proposed Submission Adur Local Plan 2014, can, to some extent, help to reduce crime, the fear of crime and anti-social behaviour through designing out elements that can contribute to crime and providing natural surveillance.
12. To promote sustainable transport and reduce the use of the private car	
Amber	New Monks Farm Although this site is on the edge of the Built Up Area, it is reasonably well connected to public transport links and general services so as to reduce the need for a car.
Green	Shoreham Harbour (western arm) This site is well connected to existing rail stations and the coastal bus service. The development will also help to improve the existing cycling/pedestrian network along the coast.

Green	<p>Civic Centre</p> <p>The site is located at the eastern end of Shoreham town centre and as a result has very good links to public transport and general services.</p>
Green	<p>Ropetackle North</p> <p>This site is on the edge of Shoreham town centre and as a result has good links to public transport and general services.</p>
Amber	<p>Lancing Manor Filling Station</p> <p>This site is located on the edge of the built up area. Although it is not particularly well connected to services and facilities, the site is reasonably well connected to public transport links.</p>
13. To reduce poverty, social exclusion and social inequalities	
Green	<p>New Monks Farm</p> <p>The proposed development includes a significant amount of new housing and 30% of this will be affordable. This could help to reduce social exclusion through the provision of new affordable housing that is well integrated with private housing.</p> <p>Additionally, up to 10,000sqm of employment generating floorspace is to be provided. New employment opportunities can help to reduce poverty and social exclusion.</p>
Green	<p>Shoreham Harbour (western arm)</p> <p>A range of uses are proposed at Shoreham Harbour such as housing (including affordable housing), employment, community and training facilities etc. all of which could help meet the objective.</p>
Green	<p>Civic Centre</p> <p>Dependent on the amount of any residential development on site, affordable housing will either be provided on site or contributions will be made towards off site provision. This could help towards reducing social exclusion.</p>
Green	<p>Ropetackle North</p> <p>The proposed development includes a significant amount of new housing and a proportion of this will be affordable. This will help to reduce social exclusion through the provision of new affordable housing that is well integrated with private housing.</p> <p>Additionally, a number of employment generating uses are proposed (offices, hotel, retail etc.). New employment opportunities can help to reduce poverty and social exclusion.</p>

	<p>Lancing Manor Filling Station This site isn't large enough to significantly contribute to this objective although off-site contributions would be required towards affordable housing as part of any development.</p>
14. To meet the need for housing and ensure all groups have access to decent and appropriate housing	
Green	<p>New Monks Farm 450-600 new dwellings are proposed at this site up to 2031 and 30% of these would be affordable. They would also comprise a range of tenures and sizes. The proposed development of this site would clearly contribute to this objective.</p>
Green	<p>Shoreham Harbour (western arm) 1100 new residential dwellings are proposed at Shoreham Harbour up to 2031 and a proportion of these would be affordable. They would also comprise a range of tenures and sizes. The regeneration of Shoreham Harbour would clearly contribute to this objective.</p>
Green	<p>Civic Centre The proposed redevelopment of this site will contain a residential element which would contribute to this objective.</p>
Green	<p>Ropetackle North 120 new residential dwellings are proposed at this site and a proportion of these would be affordable. They would also comprise a range of tenures and sizes. The proposed development of this site would clearly contribute to this objective.</p>
Green	<p>Lancing Manor Filling Station Residential development is proposed at this site so it would make a contribution to this objective.</p>
15. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	
Green	<p>New Monks Farm The Proposed Submission Adur Local Plan 2014 promotes high quality design which can help create and sustain vibrant communities. New employment floorspace, community facilities, a country park and other recreational facilities are also proposed on the site which would help contribute to this objective.</p>

Green	Shoreham Harbour (western arm) A range of development is proposed at the Harbour such as housing (including affordable housing and a range of tenures and sizes), employment and community facilities, all of which should help to meet the aims of this objective.
Green	Civic Centre The Proposed Submission Adur Local Plan 2014 promotes high quality design which can help create and sustain vibrant communities.
Green	Ropetackle North The Revised Draft Local Plan promotes high quality design which can help create and sustain vibrant communities. Additionally, as part of a mix of uses, new employment generating floorspace is also proposed at this site which could help contribute to this objective.
Green	Lancing Manor Filling Station The Proposed Submission Adur Local Plan 2014 promotes high quality design which can help create and sustain vibrant communities.
16. To promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy	
Green	New Monks Farm A significant amount of employment generating uses are proposed at this site which will contribute to this objective. Additionally, in the short term, the construction process will also provide a significant number of jobs and help the economy.
Green	Shoreham Harbour (western arm) Shoreham Port provides a significant number of jobs and its reconfiguration and consolidation will help to ensure its long term viability. Additionally, it is proposed to provide a significant amount of new jobs through the regeneration of the Harbour. The level of development itself will provide a considerable boost to the local construction industry.
Green	Civic Centre A mix of uses are to be provided on this site. In the short term, the construction process will provide a number of jobs and help the economy.

Green	<p>Ropetackle North Employment generating uses are proposed as part of a mix of uses on this site. Additionally, in the short term, the construction process will provide a significant number of jobs and help the economy.</p>
Green	<p>Lancing Manor Filling Station Although residential development on this site is unlikely to significantly contribute to this objective, there would be some short-term economic benefits associated with the construction phase of the development.</p>
17. To avoid, reduce and manage the risk from all sources of flooding to and from the development	
Amber	<p>New Monks Farm Although this site is partly located within Flood Zone 3a, it has passed the sequential test which demonstrates that there are no alternative sites that could provide this level of development within flood zone 1 and 2. However, a site specific sequential test needs to be undertaken to ensure the most vulnerable uses are directed to areas at least risk of flooding.</p> <p>New development on site will have to be designed to minimise flood risk without increasing it elsewhere and a flood risk assessment will need to be undertaken.</p> <p>It should also be noted that this site suffers from significant surface water and groundwater flooding issues. These issues have been investigated further by the developer and the draft interim conclusions indicate that these issues can be mitigated. These draft conclusions have also been agreed by West Sussex County Council as the Local Lead Flood Authority.</p>
Amber	<p>Shoreham Harbour (western arm) Although a significant amount of this site is located within Flood Zone 3a, it has passed the sequential test which demonstrates that there are no alternative sites that could provide this level of development within Flood Zone 1 and 2. However, a site specific sequential test needs to be undertaken to ensure the most vulnerable uses are directed to areas at least risk of flooding.</p> <p>There are also potential issues relating to groundwater flooding on-site.</p> <p>New development will be required to mitigate these issues.</p>

Amber	<p>Civic Centre</p> <p>Although the site is located within Flood Zone 3a, it has passed the sequential test as it is located within the town centre and there are no alternative sites for such a development that are at less risk of flooding. However, a site specific sequential test needs to be undertaken to ensure the most vulnerable uses are directed to areas at least risk of flooding.</p> <p>There are also surface water and potential groundwater flooding issues on the site.</p> <p>New development will be required to mitigate these issues.</p>
Amber	<p>Ropetackle North</p> <p>Although the site is currently located within Flood Zone 3b, the flood defences proposed as part of this scheme would change the designation from flood zone 3b to flood zone 3a and would form part of the wider Shoreham Tidal Walls scheme being progressed by the Environment Agency. On this basis the site would pass the sequential test. However, a site specific sequential test needs to be undertaken to ensure the most vulnerable uses are directed to areas at least risk of flooding. New development on site will have to be designed to minimise flood risk without increasing it elsewhere.</p>
Amber	<p>Lancing Manor Filling Station</p> <p>Although the site is partly located in flood zone 3a, it has passed the sequential test due to the fact that there are not enough sites in the district to meet Adur’s objectively assessed housing need and as a result there are no alternative sites.</p> <p>A site-specific flood risk assessment would be required at the planning application stage.</p>
18. To improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	
Green	<p>New Monks Farm</p> <p>New residential development at New Monks Farm would contribute to the vitality and viability of existing centres through helping to retain existing residents as well as accommodating in-migration in the district which would result in more footfall in the town centres.</p> <p>New employment-generating development is likely to reduce out-commuting and potentially increase in-commuting which is also likely to result in increased trade in Adur’s town centres. New community facilities are also proposed as part of the development.</p>

Green	<p>Shoreham Harbour (western arm) Through the regeneration of Shoreham Harbour a range of services and facilities would be provided including small scale retail, food and drink outlets, community/leisure facilities etc. Additionally, development at Shoreham Harbour would be designed to ensure strong links with Shoreham-By-Sea and Southwick town centres. These centres would benefit in increased trade from residents of new development at the Harbour.</p>
Green	<p>Civic Centre New development (including residential) on the edge of the town centre would help to increase the footfall in Shoreham town centre.</p>
Green	<p>Ropetackle North Ropetackle North is located on the edge of Shoreham-By-Sea town centre. New residential development on this site would contribute to the vitality and viability of existing centres through helping to retain existing residents as well as accommodating in-migration in the district which would result in more footfall in the town centres.</p> <p>New employment generating development is likely to reduce out-commuting and potentially increase in-commuting which is also likely to result in increased trade in Adur's town centres.</p>
	<p>Lancing Manor Filling Station Given the relatively small size of the site, any impact on this objective as a result of development at Lancing Manor Filling Station is likely to be negligible.</p>
19. To create places and spaces and buildings that work well, wear well and look good.	
Green	<p>New Monks Farm In accordance with polices in the Proposed Submission Adur Local Plan 2014, new development will have to be of high quality design.</p>
Green	<p>Shoreham Harbour (western arm) In accordance with polices in the Proposed Submission Adur Local Plan 2014, new development will have to be of high quality design.</p>
Green	<p>Civic Centre In accordance with polices in the Proposed Submission Adur Local Plan 2014, new development will have to be of high quality design.</p>

Green	Ropetackle North In accordance with polices in the Proposed Submission Adur Local Plan 2014, new development will have to be of high quality design.
Green	Lancing Manor Filling Station In accordance with polices in the Proposed Submission Adur Local Plan 2014, new development will have to be of high quality design.
20. To raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.	
Green	New Monks Farm As part of a mixed use development at New Monks Farm, a new school is proposed on this site which would contribute to his objective.
Green	Shoreham Harbour (western arm) This site proposes a mix of uses and as part of this mix there are opportunities to provide education / training facilities which could help contribute to this objective.
	Civic Centre No education/training facilities are proposed on this site and although contributions towards education would be sought from the development, the impact on this objective is likely to be negligible.
	Ropetackle North No education/training facilities are proposed on this site and although contributions towards education would be sought from the development, the impact on this objective is likely to be negligible.
	Lancing Manor Filling Station No education/training facilities are proposed on this site and although contributions towards education would be sought from the development, the impact on this objective is likely to be negligible.
21. To reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy.	
Green	New Monks Farm In accordance with the Proposed Submission Adur Local Plan 2014, new development will be required to meet, as a minimum, Level 4 of the Code for Sustainable Homes and 'Very Good' under the BREEAM standard. Under these schemes points are awarded for waste minimisation.

Green	<p>Shoreham Harbour (western arm)</p> <p>In accordance with the Proposed Submission Adur Local Plan 2014, new development will be required to meet, as a minimum, Level 4 of the Code for Sustainable Homes and 'Very Good' under the BREEAM standard. Under these schemes points are awarded for waste minimisation.</p>
Green	<p>Civic Centre</p> <p>In accordance with the Proposed Submission Adur Local Plan 2014, new development will be required to meet, as a minimum, Level 4 of the Code for Sustainable Homes and 'Very Good' under the BREEAM standard. Under these schemes points are awarded for waste minimisation.</p>
Green	<p>Ropetackle North</p> <p>In accordance with the Proposed Submission Adur Local Plan 2014, new development will be required to meet, as a minimum, Level 4 of the Code for Sustainable Homes and 'Very Good' under the BREEAM standard. Under these schemes points are awarded for waste minimisation.</p>
Green	<p>Lancing Manor Filling Station</p> <p>In accordance with the Proposed Submission Adur Local Plan 2014, new development will be required to meet, as a minimum, Level 4 of the Code for Sustainable Homes. Under these schemes points are awarded for waste minimisation.</p>

Summary Table of Part 1 of the Exception Test

Site	Sustainability Objective																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
New Monks Farm	G	G	G	A	A	A	A	A	A	G	G	A	G	G	G	G	A	G	G	G	G
Shoreham Harbour	G	A	G	A	A	G	A	A	A	A	G	G	G	G	G	G	A	G	G	G	G
Civic Centre	G	G	G	G	G	G	A	A	A	A	G	A	G	G	G	G	A	G	G		G
Ropetackle North	G	A	G	A	A	G	A	G	A	A	G	G	G	G	G	G	A	G	G		G
Lancing Manor Filling Station	G	G	G	A	G	A	A	A	A	A	G	A		G	G	G	A		G		G

As can be seen from the above tables, the proposed developments on the five sites generally score positively in relation to the sustainability objectives. It is therefore considered that the four sites pass part 1 of the Exception Test and are considered appropriate to include within the Proposed Submission Adur Local Plan 2014. The remaining part of the Exception Test (see the table below) requires a site specific flood risk assessment.

2. Has a flood risk assessment been undertaken that demonstrates that the development will be safe for its lifetime, the residual risks of flooding to people and property (including the likely effects of climate change) are acceptable and can be satisfactorily managed?

A Strategic Flood Risk Assessment (SFRA) Update for the District was produced in 2012. The SFRA, which comprises a Level 1 and 2 assessment, provides some principles as to mitigation and alleviation measures that could be applied at development sites at risk of flooding.

However, the SFRA requires supplementing with a site specific Flood Risk Assessment for each development site. The development proposals will be assessed in the light of the site-specific flood risk assessment, with the Environment Agency being consulted. This more specific assessment would be undertaken at the planning application stage.

It should be noted however, that where more specific concerns exist, as is the case with New Monks Farm, a significant level of detail needs to be provided at the Local Plan stage in order to ensure that flood risk can be mitigated before an allocation is made. With regard to New Monks Farm, significant concerns have been expressed about surface water and ground water which are not covered in detail in the SFRA due to their site-specific nature. Further work is currently being undertaken by consultants working on behalf of New Monks Farm Development regarding groundwater and surface water showing, amongst other things, that ground water on the site is prevented from rising to ground level by a substantial layer of clay. The draft conclusions of this study have been agreed by West Sussex County Council as the Local Lead Flood Authority.

Appendix 1

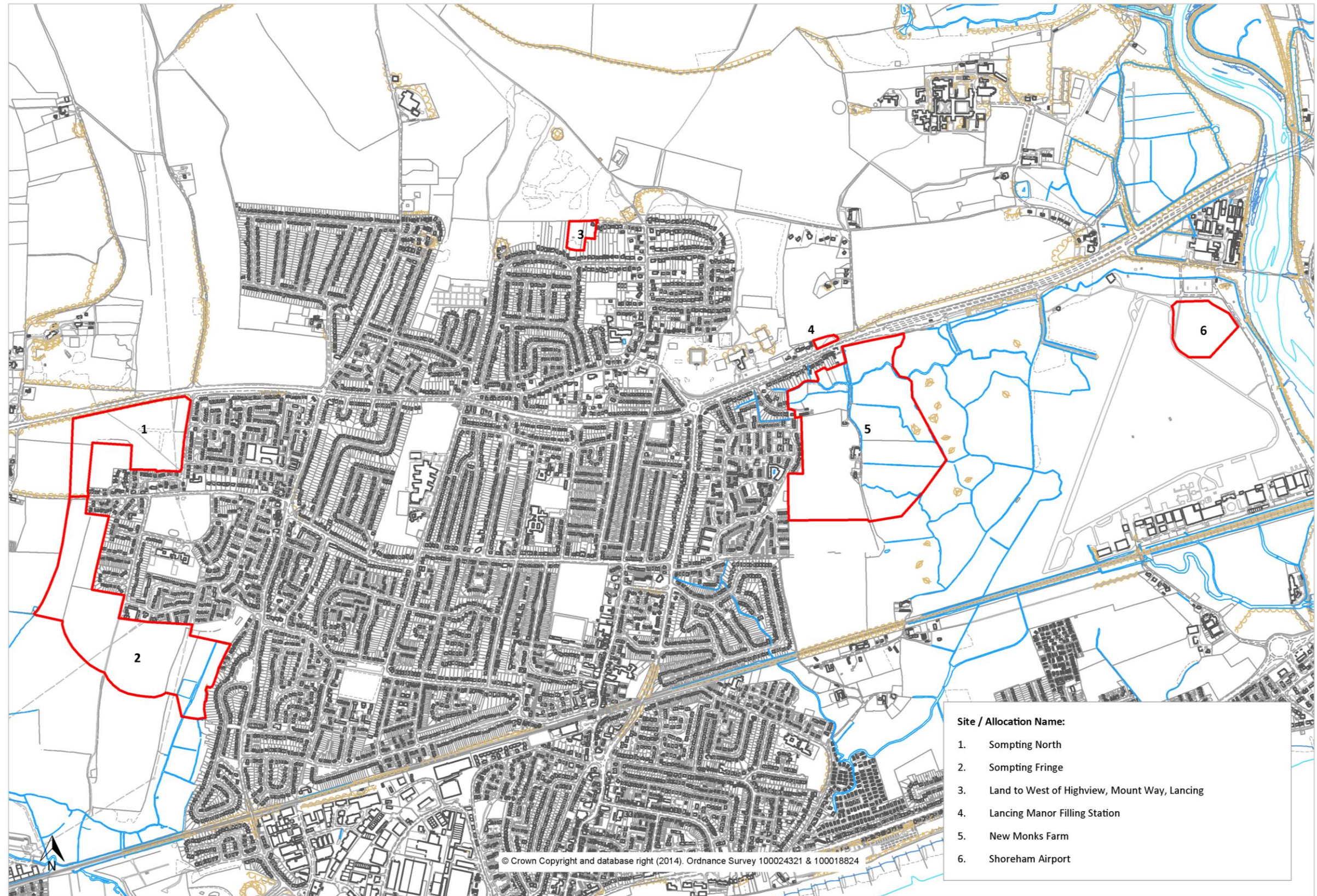
Alternative Sites Considered Through the Local Plan Process

The following table sets out alternative sites that were considered through the Local Plan process but not taken forward. For more detail on these sites and why they were not included as sites/allocations in the Local Plan, please view the Site Appraisals in the Sustainability Appraisal of the Proposed Submission Adur Local Plan 2014.

Site	Reason site not allocated in emerging Local Plan
Land South of Upper Brighton Road, Sompting Village Flood zone 1	This site lies outside of the Built Up Area in a sensitive countryside location immediately adjacent to Sompting Conservation Area. Development of this site would conflict with the aim of the emerging Adur Local Plan to restrict development in the countryside, retain the Lancing/Sompting-Worthing Local Green Gap as well as the aim of not intensifying or expanding the Lancing/Sompting – Worthing Local Green Gap. .
Land North West of Hasler Estate, Lancing Flood zone 3a and 3b	This site is located within Flood Zone 3a and 3b and is therefore not sequentially preferable to other sites at risk of flooding assessed in the Sequential Test. Although the Shoreham Tidal Walls would improve flood risk from tidal sources on the site, there are significant concerns regarding surface water and groundwater flooding on site. No evidence has been submitted at this stage to suggest that these issues can be overcome. As a result there are serious concerns regarding the deliverability of any development proposal on this site.
Land North East of Hasler Estate, Lancing Flood zone 3a and 3b	This site is located within Flood Zone 3a and 3b and is therefore not sequentially preferable to other sites at risk of flooding assessed in the Sequential Test. Although the Shoreham Tidal Walls would improve flood risk from tidal sources on the site, there are significant concerns regarding surface water and groundwater flooding on site. No evidence has been submitted at this stage to suggest that these issues can be overcome. As a result there are serious concerns regarding the deliverability of any development proposal on this site.
Shoreham Gateway site, Shoreham-By-Sea Flood zone – predominantly 3a	This site is located within Flood Zone 3a and 3b and is therefore not sequentially preferable to other sites at risk of flooding assessed in the Sequential Test. It is considered that the site makes a significant contribution to the setting of the River Adur, particularly when viewed from the well-used Downs link immediately to the west of the site and the Tollbridge, and not only acts as a gateway to Shoreham

Site	Reason site not allocated in emerging Local Plan
	but a gateway from Shoreham to the National Park. The site is an important part of the gateway sequence of views and spaces on the northern edge of Shoreham and development of the site would be an unwelcome urbanisation of this area.
Mill Hill Site, Shoreham-By-Sea Flood zone - 1	This is a prominent, sensitive site of high landscape value, and it is considered that development of the site would have a significant negative impact on the landscape of the area.

Appendix 2 – Location of Sites / Allocations within Adur (part 1)



Appendix 2 – Location of Sites / Allocations within Adur (part 2)

