

Sequential and Exception Test for the Proposed Submission Adur Local Plan

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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 (2016). 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:

- 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 - 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

- 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 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 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 3,609 new dwellings up to 2031. This is less than the objectively assessed locally generated housing need of 5,820 dwellings. This objectively assessed housing need figure is not considered achievable due to a number of constraints within the district including flood risk and landscape constraints. As a result, there are 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 Proposed Submission Adur Local Plan 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 received technical approval for the project and has now progressed the scheme to the planning application stage. Subject to planning approval, construction of the tidal walls will commence in 2016 with an indicative completion date of 2018.

It should be noted that Flood Zone 3 is defined as land having a 1 in 100 or greater annual probability of river flooding; or land having a 1 in 200 or greater annual probability of sea flooding. For the purposes of the Council's Strategic Flood Risk Assessment (SFRA) Flood Zone 3b was initially defined as land with a 1:20 annual probability of flooding or greater. However national policy and guidance now defines Flood Zone 3b as the functional floodplain: land where water has to flow or be stored in times of flood. Therefore within this document we have referred to:

- land within Flood Zone 3a, highlighting where there is a 1:20 annual probability of flooding or greater, ignoring the presence of defences
- land within Flood Zone 3b: Functional floodplain. This includes land having a 1:20 annual probability of flooding or greater where water is not prevented from flowing or being stored by existing defences, infrastructure or solid buildings.

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 this Sequential Test.

Appendix 1 of this document sets out additional sites that were considered through the Local Plan process but not taken forward. The reasons for exclusion are explained in the appendix. Two of these sites, Land North West of Hasler Estate and Land North East of Hasler Estate, were excluded, not specifically because they are at risk of flooding, but because there is still no evidence at this stage of the plan process to suggest that the numerous flood risk issues on these sites can be overcome. Both the Environment Agency and West Sussex County (as the Lead Local Flood Authority) have also expressed significant concerns about the flood risk on these sites. Therefore, there are large uncertainties about the delivery and viability of development at these sites which is why they have been excluded from the Sequential and Exception 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) Gypsy and travellers site	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)
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)	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 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 Proposed Submission Adur Local Plan 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 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>

No	<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 • 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 • Civic Centre • Sompting Fringe • Lancing Manor Filling Station 	
No	<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 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</p>

<p>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 reasonably 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: functional floodplain, but the Shoreham Adur Tidal Walls scheme, when implemented, will prevent tidal water from flowing or being stored at the airport reducing 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. The 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>

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 provides a very site-specific opportunity. 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.

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
- Civic Centre
- Lancing Manor Filling Station

The following locations have very small sections within flood zone 3a.

- Sompting Fringe

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

3. For sites/allocations partly in 'Flood Zone 2 Medium Probability' of flood

risk.

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

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?

Yes List the proposed uses in these classifications:

New Monks Farm:

Highly Vulnerable

Gypsy and Traveller Site

More Vulnerable

- Community Uses
- Residential
- School

Less Vulnerable

- Employment

Water Compatible

- Open Space

Sompting Fringe

More Vulnerable

- Residential

Water Compatible

- Open Space

Shoreham Harbour

More Vulnerable

- Residential
- Community Facilities

Less Vulnerable

- Business
- Industrial
- Food and drink
- Retail

Water Compatible

- Port Associated Uses
- Sewage Treatment
- Leisure and boating facilities
- Open Space

Lancing Manor Filling Station

More Vulnerable

- Residential

	These proposals are appropriate if located in Flood Zone 2 and there is no requirement to proceed with the Exception Test
No	N/A The relocation of the Withy Patch gypsy and travellers site to within the New Monks Farm allocation will not include any additional pitches. Betterment will be provided in terms of flood risk protection through land raising. This will also enable the potential for future expansion by taking the site out of Flood Zone 3.
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?	
Yes	Identify how the risks have been reduced: <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.
No	Explain why the development types cannot be relocated: <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 response to Q2B) 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. <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. <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 locate 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.
4. For sites/allocations in Flood Zone 3a - High Probability of flood risk	

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

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

No Explain why the development types cannot be relocated to Flood Zone 2:

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. Development has been maximised at all available sites in Flood Zones 1 and 2. However further sites are required 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 at the Harbour.

Proceed to question 4b

4b. Are the development proposals in the 'Water Compatible' or 'Less Vulnerable' classifications?

Yes List the proposed uses in these classifications:

New Monks Farm

Less Vulnerable

- Employment

Water Compatible

- Open Space

Shoreham Airport

Less Vulnerable

- Airport uses and associated employment

Shoreham Harbour

Water Compatible

- Port Associated Uses

	<ul style="list-style-type: none"> • Sewage Treatment • Leisure & boating • Open Space <p><u>Less Vulnerable</u></p> <ul style="list-style-type: none"> • Employment • Food and drink • Retail <p>Civic Centre <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>
No	<p>List the proposed uses that aren't in these classifications:</p> <p>New Monks Farm <u>Highly Vulnerable</u></p> <ul style="list-style-type: none"> • <u>Gypsy and travellers site</u> <p><u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential • Community uses • School <p>Shoreham Harbour <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential • Community uses <p>Civic Centre <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential <p>Lancing Manor Filling Station <u>More Vulnerable</u></p> <ul style="list-style-type: none"> • Residential <p>The 'more vulnerable' proposals will only be appropriate within Flood Zone 3a providing they meet the requirements of the Exceptions Test.</p>
4c. Is the development proposal in the 'Highly Vulnerable' classification?	
Yes	<p>N/A</p> <p>The relocation of the Withy Patch gypsy and travellers site to within the New Monks Farm allocation will not include any additional pitches. Betterment will be provided in terms of flood risk protection through land raising. This will also enable the potential for future expansion by taking the site out of Flood Zone</p>

	3.
No	No proposals are in the 'Highly Vulnerable' classification (see above).
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.
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	<p>See response to question 4a</p> <p>(Proceed to Question 5b)</p>
5b. Can the development proposal be redirected to Flood Zone 3a High Probability?	
Yes	<p>Redirect the proposal and proceed to Question 4b</p> <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, Land to West of Highview, 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 560 dwellings which is significantly less than Adur's objectively assessed housing need over the Plan period of 5,820 dwellings (and remaining requirement of 4,550 taking into account completions and commitments since 2011 as well as the windfall allowance). 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 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.

Development at Shoreham Airport is not currently appropriate due to the site's designation as flood zone 3b: functional floodplain. However 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 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
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 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	<p>New Monks Farm</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan, non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM. Additionally, any new major development will need to provide 10% of energy requirements through renewable/low carbon energy.</p> <p>Energy efficiency for residential development will be dealt with through Part L of the Building Regulations.</p>
Green	<p>Shoreham Harbour (western arm)</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan, non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM. Additionally, any new major development will need to provide 10% of energy requirements through renewable/low carbon energy.</p> <p>Energy efficiency for residential development will be dealt with through Part L of the Building Regulations.</p>
Green	<p>Civic Centre</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan, non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM. Additionally, any new major development will need to provide 10% of energy requirements through renewable/low carbon energy.</p> <p>Energy efficiency for residential development will be dealt with through Part L of the Building Regulations.</p>

Green	<p>Lancing Manor Filling Station</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan, non-residential development will have to be constructed to a minimum 'Very Good' standard under the BREEAM. Additionally, any new major development will need to provide 10% of energy requirements through renewable/low carbon energy.</p> <p>Energy efficiency for residential development will be dealt with through Part L of the Building Regulations.</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, all new dwellings must achieve a water efficiency standard of no more than 110 litres/person/day (lpd). Additionally, all new non-residential development will be required to meet, as a minimum, 'Very Good' under the BREEAM standard which includes 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 Proposed Submission Adur Local Plan 2016..</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, all new dwellings must achieve a water efficiency standard of no more than 110 litres/person/day (lpd). Additionally, all new non-residential development will be required to meet, as a minimum, 'Very Good' under the BREEAM standard which includes 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 Proposed Submission Adur 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, all new dwellings must achieve a water efficiency standard of no more than 110 litres/person/day (lpd). Additionally, all new non-residential development will be required to meet, as a minimum, 'Very Good' under the BREEAM standard which includes 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 Proposed Submission Adur Local Plan 2016. 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, all new dwellings must achieve a water efficiency standard of no more than 110 litres/person/day (lpd). Additionally, all new non-residential development will be required to meet, as a minimum, 'Very Good' under the BREEAM standard which includes 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 Proposed Submission Adur Local Plan. New development must not adversely impact water bodies. Such impacts would conflict with the Water Framework Directive.</p>
<p>3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials</p>	
<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	Shoreham Harbour This is a large brownfield site that seeks to make more efficient use of a large area of land.
Green	Civic Centre This is a brownfield site and is considered an efficient use of land.
Green	Lancing Manor Filling Station This is a brownfield site and is considered an efficient use of land.
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats	
Amber	New Monks Farm There are areas of local biodiversity importance on the site including a number of BAP habitats that could negatively be impacted as a result of development on the site. 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.
Amber	Shoreham Harbour (western arm) 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.
Green	Civic Centre This site is brownfield and has no significant biodiversity value. Opportunities to improve biodiversity on the site through new development will be sought.
Green	Lancing Manor Filling Station This is a brownfield site and does not have any significant biodiversity value. However, new development can provide opportunities to improve biodiversity.
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	<p>Shoreham Harbour (western arm)</p> <p>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.</p>
	<p>Civic Centre</p> <p>Development at the Civic Centre would have no impacts on this objective as the site is located a reasonable distance from Shoreham-By-Sea Conservation Area.</p>
	<p>Lancing Manor Filling Station</p> <p>This site is not located close to any areas of historic value and as a result, development at this site would have no impacts on this objective.</p>
6. Protect and enhance the countryside	
Amber	<p>New Monks Farm</p> <p>The 'Landscape Sensitivity Assessment' (2016) states that the site has a medium-low overall landscape sensitivity and is less visible in sensitive views. However, the 'Landscape and Ecology Surveys of Key Sites Within Adur District' 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.</p>
Green	<p>Shoreham Harbour (western arm)</p> <p>Shoreham Harbour is a brownfield site within the urban area of the district and would have no negative impacts on the countryside.</p>

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>
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>Lancing Manor Filling Station 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 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 and other national guidance, any new development at Shoreham Harbour should minimise the potential of pollution migrating to air, land and water.</p> <p>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 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</p> <p>In accordance with policies in the Proposed Submission Local Plan 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 which is a major contributor to air pollution.</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>
Amber	<p>Lancing Manor Filling Station</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan and other national guidance, any new development at the site should minimise the potential of pollution migrating to air, land and water.</p> <p>Due to previous uses at the site, there is potential for the site to be contaminated. New development would provide opportunities to remediate such contamination.</p> <p>The site is not located particularly close to services and facilities due to being located on the edge of the Built Up Area so the development is likely to generate more car trips than a more central site.</p>
<p>9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events</p>	
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 Adur 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>Lancing Manor Filling Station</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 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, biodiversity enhancements etc. will have to be incorporated into new development. The Environment Agency are also currently progressing the Shoreham Adur 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</p> <p>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. Contributions will therefore be sought to improve existing open spaces in the area.</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> <p>There are limited opportunities to provide open space on the site. However, contributions may be sought to improve nearby open space provision subject to the amount of residential development provided on site.</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	<p>New Monks Farm High quality design, as required by policies in the Proposed Submission Adur Local Plan, 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.</p>
Green	<p>Shoreham Harbour (western arm) High quality design, as required by policies in the Proposed</p>

	Submission Adur Local Plan, 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, 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, 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	Civic Centre 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.
Amber	Lancing Manor Filling Station 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.
13. To reduce poverty, social exclusion and social inequalities	
Green	New Monks Farm 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. Additionally, up to 10,000sqm of employment generating floorspace is to be provided. New employment opportunities can help to reduce poverty and social exclusion.

Green	Shoreham Harbour (western arm) 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.
Green	Civic Centre 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.
	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.
14. To meet the need for housing and ensure all groups have access to decent and appropriate housing	
Green	New Monks Farm 600 new dwellings are proposed at this site 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.
Green	Shoreham Harbour (western arm) 1,100 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.
Green	Civic Centre The proposed redevelopment of this site will contain a residential element which would contribute to this objective.
Green	Lancing Manor Filling Station Residential development is proposed at this site so it would make a contribution to this objective.
15. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	
Green	New Monks Farm The Proposed Submission Adur Local Plan promotes high quality design which can help create and sustain vibrant communities. New employment floorspace, community facilities, a school, a country park and other recreational facilities are also proposed on the site which would help

	contribute to this objective.
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 promotes high quality design which can help create and sustain vibrant communities.
	Lancing Manor Filling Station The Proposed Submission Adur Local Plan promotes high quality design which can help create and sustain vibrant communities. However, the impact on this objective for a development of this size is likely to be negligible.
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	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.
17. To avoid, reduce and manage the risk from all sources of flooding to and from the development	

Amber	<p>New Monks Farm</p> <p>Although this site is partly located within Flood Zone 3a, it has passed the sequential test, demonstrating a lack of available alternative sites within the district to meet housing needs which are not at 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>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 through a hydrogeological study and through the production of the Lancing Surface Water Management Plan. Part 2 of the Exception Test looks at these issues in more detail.</p>
Amber	<p>Shoreham Harbour (western arm)</p> <p>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 and exceptions 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.</p> <p>There are also surface water and potential groundwater flooding issues on the site.</p> <p>New development will be required to be safe for its lifetime without worsening flood risk 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 and would need to demonstrate that</p>

	new development will be safe for its lifetime without worsening flood risk elsewhere.
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)</p> <p>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</p> <p>New development (including residential) on the edge of the town centre would help to increase the footfall in Shoreham town centre.</p>
	<p>Lancing Manor Filling Station</p> <p>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</p> <p>In accordance with policies in the Proposed Submission Adur Local Plan, new development will have to be of high quality design.</p>

Green	Shoreham Harbour (western arm) In accordance with polices in the Proposed Submission Adur Local Plan, new development will have to be of high quality design.
Green	Civic Centre In accordance with polices in the Proposed Submission Adur Local Plan, 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, 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 this objective.
	Shoreham Harbour (western arm) 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.
	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.
	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 Policies in the Proposed Submission Adur Local Plan aim to minimise waste.
Green	Shoreham Harbour (western arm) Policies in the Proposed Submission Adur Local Plan aim to minimise waste.

Green	<p>Civic Centre Policies in the Proposed Submission Adur Local Plan aim to minimise waste.</p>
	<p>Lancing Manor Filling Station The impact on this objective is likely to be negligible due to the size of the development.</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
Civic Centre	G	G	G	G		G	A	A	A	A	G	G	G	G	G	G	A	G	G		G
Lancing Manor Filling Station	G	G	G	G		A	A	A	A	A	G	A		G		G	A		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 five sites pass Part 1 of the Exception Test. Part 2 of the Exception Test is set out below.

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, as required by national planning policy, a site specific Flood Risk Assessment will still be required for each development site at the planning application stage. The development proposals will be assessed in the light of the site-specific flood risk assessment, with the Environment Agency and West Sussex County Council (as the Lead Local Flood Authority) being consulted. 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 the flood risks posed are capable of being managed 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 assessed in detail in the SFRA due to its more strategic nature. Further work has been undertaken by consultants working on behalf of New Monks Farm Developments regarding groundwater which shows that throughout much of the site ground water is prevented from rising to ground level by a substantial layer of clay. The conclusions of this study have been agreed by West Sussex County Council as the Lead Local Flood Authority. Further work regarding drainage is currently being undertaken by the site promoter.

A Surface Water Management Plan for Lancing has also been undertaken by West Sussex County Council. This Management Plan was produced to understand the current causes of flooding and identify any capital improvements or ongoing maintenance needed to reduce the impacts of flooding to people and infrastructure.

The following table sets out how the Council considers the flood risks could be made safe for the lifetime of development, without increasing flood risk elsewhere, and where possible reducing flood risk overall for each of the sites subject to the Exception Test.

New Monks Farm

Flood Risk	Issue	Recommended Mitigation (how can this be managed)	Outcome
Tidal (from the River Adur)	Most of the site is located within Flood Zone 3	<ul style="list-style-type: none"> • The Adur Tidal Walls scheme will provide improved protection to the local area. • The sequential approach should inform the site layout considering all sources of flooding to locate the most vulnerable uses in the areas of lowest risk. 	Ensure development is safe across its lifetime
	Residual risk should flood defences fail or be overtopped.	<ul style="list-style-type: none"> • Design buildings to avoid flooding by raising finished floor levels for residential development above the 1:200 year flood level for 2115 to ensure internal flooding does not occur; and/or • Localised land raising above the 1:200 year flood level for 2115 where required, secondary flood defences or appropriate evacuation and flood response procedures should be put in place to fully manage and mitigate flood risk. • Provide flood resilient measures and resistant construction for the 1:200 year flood level for 2115. 	Ensure development is safe across its lifetime
Surface Water	The site and local area suffer from surface water	<ul style="list-style-type: none"> • A surface water drainage strategy incorporating Sustainable Drainage Systems (SuDS) should be 	Ensure flood risk is not increased elsewhere

	flooding.	<p>developed.</p> <ul style="list-style-type: none"> • Overland flow routes should be maintained. • Ensure total runoff rates from new development are below that experienced prior to development by providing additional storage and attenuation. • The drainage strategy should ensure that adequate capacity is available in the on-site system for existing and future volumes. 	
		<ul style="list-style-type: none"> • The development should take account of and where possible seek to facilitate recommendations from the Lancing SWMP. • Opportunities should be explored to increase on site storage capacity in the ditch network through widening or deepening channels and providing on site storage or other measures to reduce upstream impacts of tide locking. • The site should be designed to safely manage rainfall events in excess of 1 in 100 year plus climate change 	Where possible reduce flood risk overall
Groundwater	There is shallow perched groundwater in the clay just below the ground surface. The clay also confines a deeper groundwater aquifer in the chalk	<ul style="list-style-type: none"> • Development must provide suitable engineering options to prevent interaction between the surface water or perched groundwater layer and the deeper groundwater associated with the chalk strata. 	Ensure development is safe across its lifetime
		<ul style="list-style-type: none"> • The proposed surface water drainage strategy will need to discharge to watercourses and ultimately the River 	Ensure flood risk is not increased elsewhere

		Adur rather than relying on infiltration.	
		<ul style="list-style-type: none"> Adequate/additional capacity in the surface water system should be allowed for additional flows from groundwater which may have previously pooled on site. 	Ensure flood risk is not increased elsewhere.
	Water from springs and groundwater levels rising above ground is currently conveyed across the site through watercourses.	<ul style="list-style-type: none"> Development must maintain the existing capacity and conveyance between springs/groundwater and the ditch network. 	Ensure flood risk is not increased elsewhere

Shoreham Harbour (western arm)

Flood Risk	Issue	Recommended Mitigation (how can this be managed)	Outcome
Tidal (including from the River Adur)	Parts of the site are located within Flood Zone 3. Some areas would flood in an event with an annual probability of 1 in 20 or greater in any year but are not considered to be within the functional floodplain.	<ul style="list-style-type: none"> New flood defences will need to be provided along the western arm of the Harbour to enable new development. The sequential approach should inform the site layout considering all sources of flooding to locate the most vulnerable uses in the areas of lowest risk. 	Ensure development is safe across its lifetime

	Residual risk should the new flood defences fail or be overtopped.	<ul style="list-style-type: none"> Finished Floor Levels for residential development should be raised above the 1:200 year flood level for 2115 to ensure internal flooding does not occur. The Shoreham Harbour Flood Risk Management Guide Supplementary Planning Document (SPD, 2015) sets finished floor levels at 5.77m. For non-residential uses, the SPD advises that development should be designed to be safe for the lifetime of the building, assumed to be at least 60 years from the date of gaining planning permission. Raise land levels locally to above the 1:200 year flood level for 2115. This will ensure that safe access and egress is provided and the development is protected from flood events. Flood resilient and resistant construction below the 1:200 year flood level for 2115. 	Ensure development is safe across its lifetime
Surface Water	The SFRA identifies a relatively small area of potential surface water flooding within the western arm of the Harbour.	<ul style="list-style-type: none"> Surface water can drain directly to the River Adur without attenuation due to its close proximity assuming pollution mitigation measures are also included. The Flood Risk Management Guide SPD identifies suitable SuDS for the Western Harbour Arm. 	Ensure flood risk is not increased elsewhere
		<ul style="list-style-type: none"> The surface water drainage strategy should be designed to manage exceedance events. 	Where possible reduce flood risk overall
Groundwater	The SFRA identifies potential susceptibility to	<ul style="list-style-type: none"> Any new development should ensure prevention of emergence of groundwater at sub-level. This may include 	Ensure development is safe across its lifetime

	groundwater flooding within the western arm of Shoreham Harbour.	tanking of any basements.	
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Civic Centre, Shoreham-By-Sea

Flood Risk	Issue	Recommended Mitigation (how this can be managed)	Outcome
Tidal	The site is partly located in Flood Zone 3.	<ul style="list-style-type: none"> Finished Floor Levels for residential development should be raised above the 1:200 year flood level for 2115 to ensure internal flooding does not occur. For non-residential uses, development should be designed to be safe for the lifetime of the building, assumed to be at least 60 years from the date of gaining planning permission. Safe access and egress should be provided The sequential approach should inform the site layout considering all sources of flooding to locate the most vulnerable uses in the areas of lowest risk. Flood resilient and resistant construction below the 1:200 year flood level for 2115. 	Ensure development is safe across its lifetime
Surface Water	The whole of the site is identified in the SFRA as	<ul style="list-style-type: none"> A surface water drainage strategy incorporating Sustainable Drainage Systems (SuDS) should be 	Ensure flood risk is not increased elsewhere

	being susceptible to surface water flooding.	<p>developed.</p> <ul style="list-style-type: none"> Unless surface water can drain directly to the River Adur (with pollution mitigation), attenuation should be provided to reduce surface runoff flows as far as possible. 	Where possible reduce flood risk overall
Groundwater	The SFRA identifies the whole of the site as having potential susceptibility to groundwater flooding.	<ul style="list-style-type: none"> Any new development should ensure prevention of emergence of groundwater at sub-level. This may include tanking of any basements. 	Ensure development is safe across its lifetime

Lancing Manor Filling Station

Flood Risk	Issue	Recommended Mitigation (how this can be managed)	Outcome
Tidal	The site is partly located in Flood Zone 3.	<ul style="list-style-type: none"> Finished Floor Levels for residential development should be raised above the 1:200 year flood level for 2115 to ensure internal flooding does not occur. For non-residential uses, development should be designed to be safe for the lifetime of the building, assumed to be at least 60 years from the date of gaining planning permission. Safe access and egress should be provided The sequential approach should inform the site layout 	Ensure development is safe across its lifetime

		<p>considering all sources of flooding to locate the most vulnerable uses in the areas of lowest risk.</p> <ul style="list-style-type: none"> • Flood resilient and resistant construction below the 1:200 year flood level for 2115. 	
Surface Water	The whole of the site is identified in the SFRA as being susceptible to surface water flooding.	<ul style="list-style-type: none"> • A surface water drainage strategy incorporating Sustainable Drainage Systems (SuDS) should be developed. • Unless surface water can drain directly to the River Adur (with pollution mitigation), attenuation should be provided to reduce surface runoff flows as far as possible. 	<p>Ensure flood risk is not increased elsewhere</p> <p>Where possible reduce flood risk overall</p>
Groundwater	The SFRA identifies the whole of the site as having potential susceptibility to groundwater flooding.	<ul style="list-style-type: none"> • Any new development should ensure prevention of emergence of groundwater at sub-level. This may include tanking of any basements. 	Ensure development is safe across its lifetime

Appendix 1

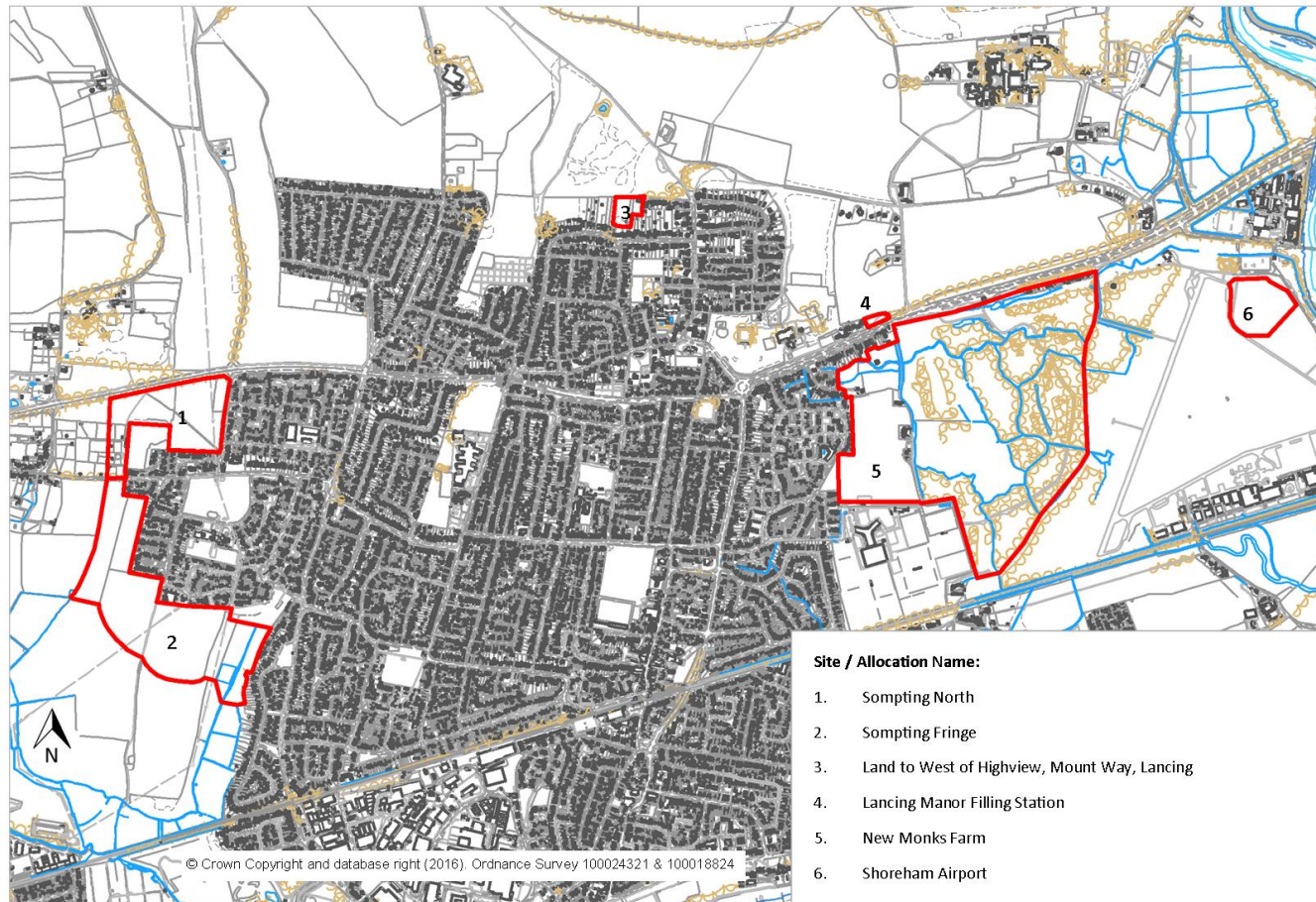
Additional Sites Considered Through the Local Plan Process

The following table sets out additional 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 Adur Local Plan.

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	<p>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.</p> <p>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 but a gateway from Shoreham to the National Park. The site is</p>

Site	Reason site not allocated in emerging Local Plan
	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)

