WORTHING BOROUGH COUNCIL

SEQUENTIAL & EXCEPTIONS TEST

Regulation 18

October 2018

wlp Worthing Local Plan

WBC WORTHING BOROUGH COUNCIL

Sequential and Exception Test for the Draft Worthing Local Plan (October 2018)

1.1 **Introduction**

1.1.1 This paper sets out the Sequential Test and where required Exception Test for the proposed site allocations identified in the Draft Worthing Local Plan (2018). It has been undertaken using the Environment Agency flood maps and information contained in the current Strategic Flood Risk Assessment (SFRA) (2012). This will be revised for the next stage of consultation on the Local Plan following an update to the SFRA.

1.1.2 Following the steps outlined in the revised National Planning Policy Framework (NPPF) (2018) and the Planning Practice Guidance, the sequential test 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 sites 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 site;
Part 3 sets out the Exception Test for sites located within Flood Zone 3.

1.1.3 Local Plans should be supported by a SFRA. The purpose of the SFRA is to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk.

1.1.4 The Adur and Worthing SFRA builds upon the Environment Agency's flood map. The SFRA was updated in 2012 to help inform the location of new development within the Local Plan area and satisfy the requirements of a Level 1 and Level 2 SFRA. The SFRA considers flooding from all sources, now and in the future, taking account of the impacts of climate change (as assessed at that time). The SFRA also distinguishes between Flood Zones 3a and 3b.

1.1.5 The SFRA will be updated to support the new Local Plan. It will provide both a level 1 and level 2 assessment to inform the Sequential and Exception Tests.

2. Part 1: Context

2.1.1 A significant number of properties in Worthing are at risk from surface water flooding. There are also areas of flood risk associated with Worthing's coastal location, the Ferring Rife in the west of the borough and the Teville Stream in the east which drains into Brooklands Lake.

2.1.2 It should be noted that Flood Zone 3 is land that has a high probability of flooding from rivers or the sea. It 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 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 1:100 or 1:200 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.

2.1.3 Worthing is tightly constrained and there is little scope to grow beyond the current boundary without merging with the urban areas of Ferring and Lancing and without damaging the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up areas that could deliver significant levels of growth.

2.1.4 The Draft Local Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the high quality environments and open spaces within and around the town. Sites have been identified through the Council's Strategic Housing Land Availability Assessment (SHLAA) and 'calls for sites' which have resulted in the Plan allocating both urban and edge of town sites. However Worthing has a significant need for new housing, and although the local housing need figure is not considered achievable, the Council has sought to plan positively to establish whether housing delivery could be increased significantly to meet local need as far as possible. Therefore in addition to allocated sites the plan identifies 'areas of change' which are regeneration sites where there is less certainty about delivery.

2.1.5 For the purposes of this Sequential and Exception Test, all sites included in the Local Plan (allocations, areas of change and omission sites) are assessed.

2.1.6 The following table outlines the sites being taken forward through the Draft Worthing Local Plan; the flood risk associated with each site; existing flood defences (where appropriate); and the proposed new uses and relevant flood vulnerability classification.

This has been informed using the following sources of information:

- Environment Agency Flood Map for Planning
- Environment Agency Updated Flood Map for Surface Water
- Adur and Worthing SFRA: Areas Susceptible to Groundwater Flooding
- Adur and Worthing SFRA: Future tidal flood risk (with defences) and Future Fluvial Flood Risk (with defences)

Table 1: Analysis of Local Plan sites

Site	Flood Zone (current day)	Surface Water	Groundwater	Future Flood Risk (defended)	Proposed Uses
Allocations					
Caravan Club	Flood Zone 1	The site is partly in an area with a medium chance of flooding from surface water	The area is considered to be at a medium risk of groundwater flooding	No	Residential (More Vulnerable)
Land west of Fulbeck Avenue	Flood Zone 1	The site is partly in an area with a high chance of flooding from surface water	The area is considered to be at a medium risk of groundwater flooding	No	Residential (More Vulnerable)
Upper Brighton Road	Flood Zone 1	The site is partly in an area with a medium chance of flooding from surface water	The area is considered to be at a high risk of groundwater flooding	No	Residential (More Vulnerable)
Decoy Farm	The site is partly located in Flood Zone 2/3	The site is partly in an area with a high chance of flooding from surface water	The area is considered to be at a high risk of groundwater flooding.	Partly	Commercial (less vulnerable)
Teville Gate	The site is located in Flood Zone 1	The area has a high chance of flooding from surface water	The area is considered to be at a high risk of groundwater flooding.	No	Mixed Use (More Vulnerable)

Union Place	The site is located in Flood Zone 1	The site is partly in an area with a high chance of flooding from surface water	The area is considered to be at a low risk of groundwater flooding.	No	Mixed Use (More Vulnerable)
Grafton	The majority of the site is located in Flood Zone 3	The area has a low or very low chance of flooding from surface water	The area is considered to be at a low risk of groundwater flooding.	No	Mixed Use (More Vulnerable)
Civic Centre Car Park	Flood Zone 1	The area has a low or very low chance of flooding from surface water	The area is considered to be a low risk of groundwater flooding.	No	Mixed Use (More Vulnerable)
Areas of Change					
Centenary House	Flood Zone 1	The site is partly in an area with a medium chance of flooding from surface water	The area is considered to be at a high risk of groundwater flooding.	No	Mixed Use (More Vulnerable)
British Gas Site, Lyndhurst Rd	The site is located in Flood Zone 1	The area has a very low chance of flooding from surface water	The area is considered to be at a medium risk of groundwater flooding.	No	Residential (More Vulnerable)
Stagecoach, Marine Parade	A large portion of the site is located in Flood Zone 2/3.	The area has a low chance of flooding from surface water	The area is considered to be at a low risk of groundwater flooding.	No	Mixed Use (More Vulnerable)
Worthing Leisure Centre	Flood Zone 1	Parts of the site are in areas with a medium or high chance of flooding from surface water	The area is considered to be at a high risk of groundwater flooding.	No	Mixed Use (More Vulnerable)
HMRC Offices, Barrington Rd	The site is located in Flood Zone 1	The site is partly in an area with a high chance of flooding from surface water.	The area is considered to be at a medium risk of groundwater flooding.	No	Mixed Use (More Vulnerable)

Martlets Way	The site is located in Flood Zone 1	The area has a low or very low chance of flooding from surface water.	The area is considered to be at a low risk of groundwater flooding.	No	Commercial (less vulnerable)
Omission Sites					
Land east of Titnore Lane	Flood Zone 1	The area has a low or very low chance of flooding from surface water	The area is considered to be at a medium risk of groundwater flooding.	No	Residential (More Vulnerable)
Land north of Beeches Ave	Flood Zone 1	The site is in an area with a low or very low chance of flooding from surface water.	The area is considered to be at a low risk of groundwater flooding	No	Residential (More Vulnerable)
Worthing United Football Club	Flood Zone 1	The site is partly in an area with a high chance of flooding from surface water	The area is considered to be at a low risk of groundwater flooding	No	Residential (More Vulnerable)

2.1.7 At this stage the following sites are included in the Local Plan as omission sites.

- Land north of Beeches Avenue - It has not been demonstrated that suitable vehicular access arrangements can be achieved.
- Worthing United Football Ground - The redevelopment of this site is dependant on the relocation of the Football Club. At this stage the Council is not satisfied that the Football Club can be suitably relocated and that the resulting loss of a playing field is justified.
- Land east of Titnore Lane - It has not been demonstrated that residential development would not result in the loss or deterioration of ancient woodland (an irreplaceable habitat) or have a negative impact on the Local Wildlife Site. In addition further evidence is required to demonstrate that suitable access may be achievable from Titnore Lane.

2.1.8 These are sites where, in principle, a level of development might be acceptable. However at this stage sufficient and robust evidence has not been submitted that would provide confidence that the identified constraints could be overcome. These sites could be allocated in the next version of the Local Plan if it can be demonstrated that the current delivery constraints can be suitably addressed. It should be noted that none of these sites have been omitted due to flood risk.

2.1.9 The following sites were initially identified but have not been included within the Draft Local Plan either due to constraints that cannot be overcome or as development has been permitted and is underway. It is therefore not considered that these are reasonably available for the purposes of the Sequential Test.

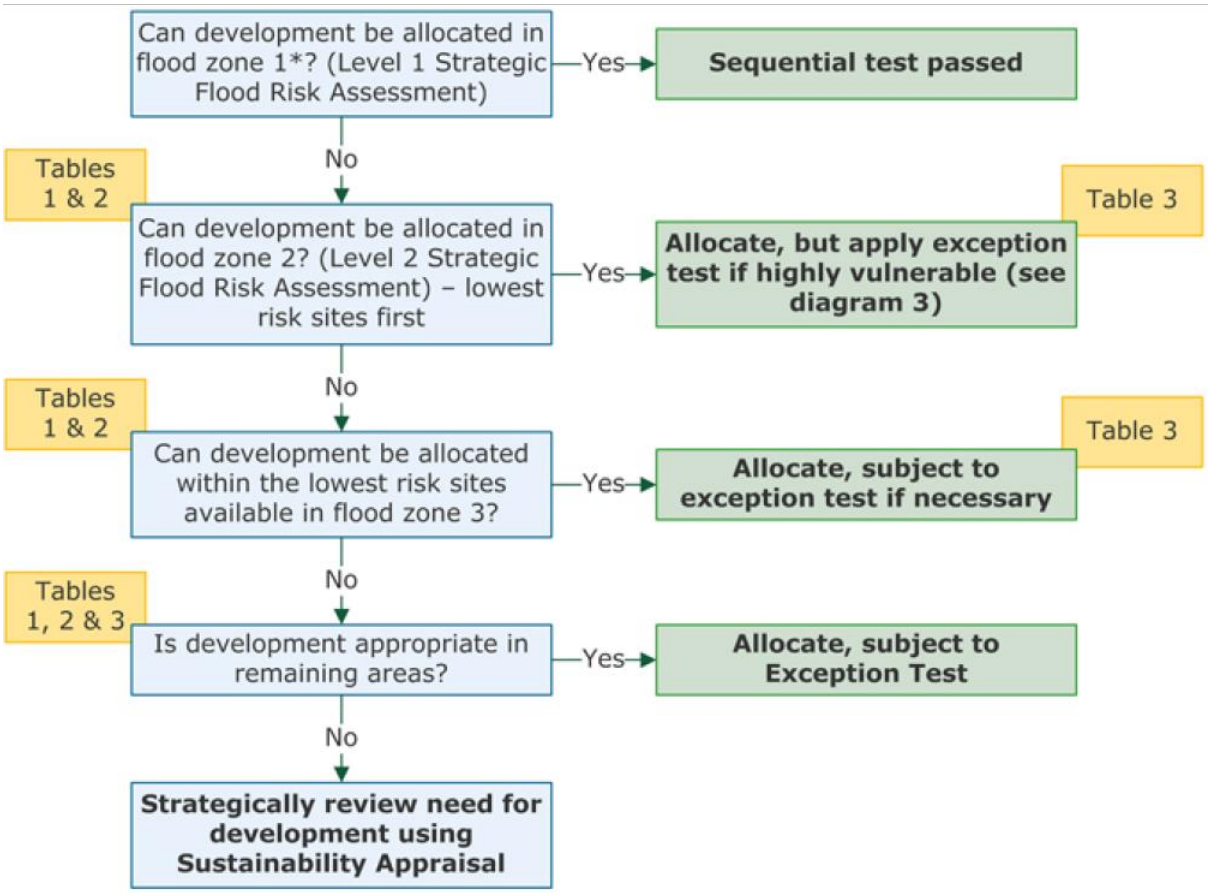
Table 2: Excluded Local Plan Sites

Site	Flood Zone (current day)	Surface Water	Groundwater	Future Flood Risk (defended)	Reason for not including
Goring - Ferring Gap	Partly Flood Zone 2/3	The site is partly in an area with a high chance of flooding from surface water	The area is considered to be at a medium risk of groundwater flooding	No	Landscape evidence
Chatsmore Farm	Partly Flood Zone 2/3	The site is partly in an area with a high chance of flooding from surface water	The site is partly in an area is considered to be at a high risk of groundwater flooding	Partly fluvial flood risk	Landscape evidence
Aquarena	The whole site is located in Flood Zone 3.	The site is partly in an area with a medium chance of flooding from surface water	The area is considered to be at a low risk of groundwater flooding.	Partly	Development permitted and underway
Land north of Dale Road	Partly Flood Zone 2/3	The site is partly in an area with a medium chance of flooding from surface water	The area is considered to be at a medium risk of groundwater flooding.	No	Landscape evidence and land stability issues
Columbia House	A large portion of the site is in Flood Zone 2/3	The area has a low or very low chance of flooding from surface water	The area is considered to be at a high risk of groundwater flooding.	No	Building being converted under Permitted Development rights.
Land north of West Durrington	Flood Zone 1	The site is partly in an area with a high chance of flooding from surface water	The area is considered to be at a low risk of groundwater flooding.	No	Development permitted and underway

3. Part 2: Sequential Test

3.1.1 The aim of the Sequential Test is to direct development to areas of lowest flood risk first to ensure that these are developed in preference to areas at higher risk. The Environment Agency flood zones provide the basis for applying the Test, however within each flood zone, surface water and other sources of flooding also need to be taken into account. Only where there are no available sites in Flood Zone 1 or 2 should the suitability of sites in Flood Zone 3 be considered.

Figure 1: Application of the Sequential Test for Local Plan preparation



PPG Paragraph: 021 Reference ID: 7-021-20140306

Reference to Tables 1, 2, and 3 in this figure refers to tables in the Planning Practice Guidance which provide definitions of Flood Zones, Development Vulnerability and the Flood Risk Vulnerability and Flood Zone Compatibility matrix.

Table 3: Sequential Test

1. Can development be allocated in Flood Zone 1?	
Yes	Sites wholly in Flood Zone 1 include: ● Land north of Beeches Ave (currently an omission site) ● Worthing United Football Club (currently an omission site)

	● Upper Brighton Rd ● Caravan Club ● Land west of Fulbeck Avenue ● Land east of Titnore Lane (currently an omission site) ● Union Place ● Teville Gate ● British Gas Site, Lyndhurst Rd ● Martlets Way ● HMRC Offices, Barrington Rd ● Centenary House ● Civic Centre Car Park For areas listed above that are wholly within Flood Zone 1, allocation is appropriate in that flood zone and the sequential test is passed.
2. Can development be allocated in Flood Zone 2?	
No	There are no sites located wholly in Flood Zone 2
3a. Can development be allocated within the lowest risk sites available in flood zone 3?	
Yes	● Decoy Farm Areas along the site boundaries are within Flood Zone 3. ● Stagecoach The site is partly located in Flood Zones 2 and 3. Within the site the most vulnerable proposed uses should be directed to the areas of lowest flood risk. ● Grafton The majority of the site is located in Flood Zones 2 and 3.
3b. Could the proposed development be alternatively located in a site wholly within Flood Zone 1?	
No	As demonstrated above there were no alternative sites identified through the SHLAA or the Call for Sites which could accommodate development in Flood Zone 1. These sites are required to meet Worthing's local development needs. Even with these sites included, there is still a substantial gap between the level of development that can be accommodated and the amount of development needed.
3c. Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	
Yes	● Decoy Farm Areas along the site boundaries are within Flood Zone 3. It will be possible to accommodate development within Flood Zone 1 only. ● Stagecoach The site is partly located in Flood Zones 2 and 3. Within the site the most vulnerable proposed uses should be directed to the areas of lowest flood risk. ● Grafton The majority of the site is located in Flood Zones 2 and 3. 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 the Exception Test must also be applied, and where appropriate a site specific Flood Risk Assessment will be required.

There are no proposals in the 'Highly Vulnerable' classification. Therefore the above sites pass the sequential test and can be allocated, subject to the Exception Test.

3.1.2 Due to the limited number of sites available to help meet Worthing's housing and employment needs, all suitably available sites are required including those at risk of flooding. The majority of sites are located in Flood Zone 1 and these are the most sequentially preferable. However although it is accepted that there is insufficient capacity to meet Worthing's full local 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 number of additional sites are required. Although these sites all have a high probability of flooding, it is shown above that they pass the sequential test.

Windfall Sites

3.1.3 The draft Local Plan housing target includes a reliance on windfall sites to deliver 949 homes. Windfall sites are defined in the revised NPPF Glossary as:
"*Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available."*

3.1.4 The Environment Agency recommends that the acceptability of windfall applications in flood risk areas should be considered at the strategic level through a policy setting out broad locations and quantities of windfall development that would be acceptable or not in Sequential Test terms. In the absence of a flood risk windfall policy, it may be possible (where the data is sufficiently robust) for the LPA to apply the Sequential Test taking into account reasonably available sites, historic windfall rates and their distribution relative to Flood Zones.

3.1.5 Only a small portion of Worthing is identified as being within Flood Zones 2 and / or 3. However this includes large areas of the Town Centre. In addition given the limited land availability in Worthing the overall housing target within the Local Plan will only meet approximately 32% of the overall housing need. It is therefore considered that all potential windfall sites will need to be developed (where acceptable in terms of planning policy) to meet this need as far as possible. Even if all sites were developed it would not be possible for Worthing to meet its local housing need. It is therefore considered that it is not possible for development to be directed to areas of lowest flood risk. On this basis it is considered that the sequential test is deemed passed for all windfall sites.

4. Part 3: Exception Test

4.1.1 Following completion of the sequential test, the Exception Test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed.

Flood Risk Vulnerability and Flood Zone compatibility

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓ *

Key:

✓ Development is appropriate

✗ Development should not be permitted.

(Table 3 from National Planning Practice Guidance)

4.1.2 In accordance with the above table, the Exception Test is required for highly vulnerable development in Flood Zone 2, essential infrastructure or more vulnerable development in Flood Zone 3a and essential infrastructure in Flood Zone 3b. Therefore the Exception Test will have to be applied and passed for the following sites to be appropriate allocations in the Local Plan:

- Stagecoach (more vulnerable development in Flood Zone 3a)
- Grafton (more vulnerable development in Flood Zone 3a)

4.1.3 In addition Decoy Farm includes areas within Flood Zone 3 however, it is considered that development can be accommodated within Flood Zone 1 only and the site is being allocated for employment uses defined as a less vulnerable use. Therefore in

accordance with the table above the Exception Test is not required.

4.1.4 The aim of the Exception Test is to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.

4.1.5 For the exception test to be passed it should be demonstrated that:
a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Both elements of the exception test should be satisfied for development to be allocated.

Part A

The development would provide wider sustainability benefits to the community that outweigh the flood risk

4.1.6 The potential site allocations were scored against the objectives of the sustainability appraisal through the site criteria at an early stage. The site policy was also appraised as part of the assessment of the total effects of the Plan. The outcomes of both of these appraisals are included below for each of the sites.

Stagecoach

Site Appraisal:

SA Objective	Indicator	Stagecoach	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	PCL	Y
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	A large portion of the site is located in Flood Zone 2/3. The sequential approach should be applied to site layout so the most vulnerable uses are located in areas of lowest flood risk. The risks must be	R

		managed so that any development is safe across its lifetime without increasing flood risk elsewhere.	
	Surface Water	There is a low chance of flooding from surface water along the southern boundary of the site.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The Steyne Gardens and South Street Conservation Areas cover the entrance to the site along its southern boundary. There are a significant number of listed buildings surrounding the site with The Dome Cinema, a Grade II* Listed Building along the south eastern boundary and Stanford Cottage, a Grade II Listed Building sits along the northern boundary of the site, the listed Chatsworth Hotel and a terrace of residential units (listed) fronting The Steyne. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting. However, it is also recognised that there may be opportunities to improve their setting.	R
	Archaeology	Within an Archaeological Notification Area for the historic core of Worthing.	R
Healthy Lifestyles	Accessible open space, sport and leisure	The site is located immediately north of semi-natural greenspace in the form of the seafront (George V Avenue). It has Steyne Gardens immediately to the east of the site and Warwick Street to the north forms a pedestrianised area of civic space. However, there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 7th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	Is within 800m of 3 doctor surgeries: Health Central Surgery, Selden Medical Centre and Shelley Surgery.	G
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 490m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 900m of St Marys Roman Catholic Primary School and Heene Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison	G

		Church of England Comprehensive School for Girls are all within 2km. Davison is the nearest school approximately 1.3km away.	
Economy	Key office location or industrial estate	The site is currently used as a bus depot with ancillary uses.	R
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary.	G
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The South Coast Route runs along the seafront to the south of the site.	G
Conclusions Opportunities: • It is a brownfield site providing an opportunity for regeneration. • It is located in the Town Centre. • Located within the Built Up Area Boundary. Constraints: • A significant portion of the site is located in Flood Zone 3. • Potentially contaminated land. • The Dome Cinema, a Grade II* Listed Building is located along the southern boundary of the site, and there are a number of other heritage assets surrounding the site. • Within an area containing recorded archaeological remains. • Development of the site could potentially result in the loss of employment space.			Y

Policy Appraisal:

Objective	**AOC3 Stagecoach, Marine Parade**
1. Environmental Quality	0
	This policy would not improve environmental quality or reduce pollution.
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	++
	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
4. Energy	-
	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
5. Water Management	+
	Parts of the site lie within Flood Zone 2 and Flood Zone 3. Therefore development in this location would place additional people at risk of flooding. However managing flood risks so that development is safe across its lifetime will have a positive impact on this objective.
6. Landscape and Character	0
	This policy would have no impact on landscape and character.
7. Built Environment	+
	A development that is sensitive to the surrounding Conservation Areas will help to integrate the site with the wider area. This will have a positive impact on this objective.
8. Historic	0

Environment	This policy would have no direct impact on the historic environment
9. Healthy Lifestyles	0
	This policy would have no impact on healthy lifestyles.
10.Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11.Housing	++
	The identification of this site for mixed-uses (including a level of housing) would have a very positive effect in helping to meet this objective.
12.Communities	0
	This policy would have no direct impact on communities
13.Education	0
	This policy would have no direct impact on education
14.Economy	+
	The delivery of new leisure / cultural and commercial uses will have a positive impact on this objective.
15.Town and Local Centres	++
	This policy would have a very positive impact as regeneration will deliver a mixed use development in the heart of the town centre. Enhanced permeability and Improved access will help to meet this objective.
16.Travel and Access	0
	This policy would have no impact on access to sustainable modes of transport.
Mitigation	None identified
Conclusions	Mixed use development of this brownfield site will have very positive effects when appraised against the housing, town & local centres and land & soils objectives. Redevelopment means that it also scores positively for water management, the economy and built environment. However, in contrast, new development will have a negative effect against energy.

Grafton

Site Appraisal:

SA Objective	Indicator	Grafton	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	Non PCL.	G
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	The majority of the site, apart from a western section, is located in Flood Zone 3. The risks must be managed so that any development is safe across its lifetime without increasing flood risk elsewhere.	R

	Surface Water (awaiting maps)	There is a low or very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The Montague Street Conservation Area is located to the north of the site, the South Street Conservation Area is located to the east and south of the site, the Marine Parade and Hinterland Conservation Area is located further away to the west of the site. The Lido, a Grade II Listed Building is located across from the site on the seafront. There are a number of Listed Buildings adjacent to Knightsbridge House fronting Montague Place. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting. However it is also recognised that development may present opportunities to improve the setting particularly of The Lido.	Y
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site contains a small patch of amenity greenspace in the south west corner of the site known as Augusta Place. The Open Space Study 2014 recognises it as 'essentially a grassed area with no noticeable features' and subsequently gives it a low value score. Development should seek to re-provide some public open space. The site is also immediately north of semi-natural greenspace in the form of the seafront (George V Avenue). There is a pedestrianised area of civic street down Montague Street to the north of the site. There are no allotments within the 10 minute walk standard.	R
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 8th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	Is within 800m of 3 doctor surgeries: Health Central Surgery, Rowlands Road Surgery and Shelley Surgery.	G
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 510m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 800m of St Marys Roman Catholic Primary School and Heene Primary School.	G

	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. Worthing High School is the nearest school approximately 1.7km away.	Y
Economy	Key office location or industrial estate	The site is currently used as a car park.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary and within 800m of Rowlands Road local centre.	G
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The South Coast Route runs along the seafront to the south of the site.	G
Conclusions Opportunities: • It is a brownfield site providing an opportunity for regeneration. • It is located in the Town Centre. • Located within the Built Up Area Boundary. Constraints: • The majority of the site is in Flood Zone 3. • Development could potentially result in the loss of a small area of amenity greenspace.			Y

Policy Appraisal:

Objective	**A7 Grafton**
1. Environmental Quality	0
	This policy would not improve environmental quality or reduce pollution.
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	++
	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
4. Energy	-
	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
5. Water Management	+
	The majority of the site is in Flood Zone 3. Therefore development in this location would place additional people at risk of flooding. However adopting the sequential aproach will have a positive impact on this objective.
6. Landscape and Character	0
	This policy would have no impact on landscape and character.
7. Built Environment	++
	Redevelopment will help to integrate the site with the surrounding area, will seek to enhance heritage assets and will provide high quality public realm. This will have a positive impact on this objective.
8. Historic Environment	+
	This policy would help in achieving the objective as it will provide an attractive setting to the historic environment.
9. Healthy Lifestyles	0
	This policy would have no impact on healthy lifestyles.

10.Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11.Housing	++
	The allocation of this site for mixed-uses (including a significant level of housing) would have a very positive effect in helping to meet this objective.
12.Communities	0
	This policy would have no direct impact on communities
13.Education	0
	This policy would have no direct impact on education
14.Economy	++
	The delivery of new commercial floorspace along with improved public realm and accessibility will have a very positive impact on this objective.
15.Town and Local Centres	++
	This policy would have a very positive impact as it will facilitate regeneration through the creation of a high quality mixed use development that will help to create an improved link between the town centre and seafront. This will help to meet this objective.
16.Travel and Access	+
	A new route from the seafront to the primary shopping area would enhance pedestrian access.
Mitigation	None identified
Conclusions	Mixed use development of this brownfield site will have very positive effects when appraised against the economic, built environment, town & local centres, housing and land & soils objectives. Redevelopment means that it also scores positively for water management, travel & access and the historic environment. However, in contrast, new development will have a negative effect against energy.

Part B

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

4.1.7 Planning Practice Guidance states that in considering an allocation in a Local Plan a level 2 Strategic Flood Risk Assessment should inform consideration of the second part of the Exception Test. The current Adur and Worthing SFRA was updated in 2012 and satisfied the requirements of a level 1 and level 2 assessment. It covered both the Stagecoach and Grafton sites. Although the information included in the SFRA to satisfy Part B of the Exception Test is outlined below it is recognised that since the SFRA was last reviewed, there have been substantial changes to current day flood maps along the coastline (as a result of wave overtopping) and climate change allowances. Therefore the SFRA will be updated to better inform and satisfy this part of the Exception Test prior to the proposed submission version of the Local Plan.

Stagecoach

Flood Risk	**Issue**	**Recommended Mitigation (how can this be managed)**	**Outcome**
Tidal (from the coast)	The majority of the site is located in Flood Zone 3 as a result of wave overtopping.	The sequential approach should inform the site layout considering all sources of flooding to locate the most vulnerable uses	Ensure development is safe across its lifetime

		in the areas of lowest risk	
	The majority of the site is located in Flood Zone 3 as a result of wave overtopping.	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	Ensure development is safe across its lifetime
	The majority of the site is located in Flood Zone 3 as a result of wave overtopping.	Provide flood resilient measures and resistant construction for the 1:200 year flood level for 2115 and the effects of wave overtopping.	Ensure development is safe across its lifetime
Surface Water	Although the site is not in area identified as at risk of surface water flooding, it adjoins areas that are.	A surface water drainage strategy incorporating Sustainable Drainage Systems (SuDS) should be developed. This should ensure runoff rates are reduced as far as possible.	Where possible reduce flood risk overall
	Although the site is not in area identified as at risk of surface water flooding, a number of surrounding areas are.	Existing flood flow paths should be maintained.	Ensure flood risk is not increased elsewhere

Grafton

Flood Risk	**Issue**	**Recommended Mitigation (how can this be managed)**	**Outcome**
Tidal (from the coast)	The site is partly located in Flood Zones 2 and 3 as a result of wave overtopping.	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
	The site is partly located in Flood Zones 2 and 3 as a result of wave overtopping.	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	Ensure development is safe across its lifetime
	The site is partly located in Flood Zones 2 and 3 as a result of	Provide flood resilient measures and resistant construction for the	Ensure development is safe across its lifetime

	wave overtopping.	1:200 year flood level for 2115 and the effects of wave overtopping.	
Surface Water	Although the site is not in area identified as at risk of surface water flooding, some surrounding areas are.	A surface water drainage strategy incorporating Sustainable Drainage Systems (SuDS) should be developed. This should ensure runoff rates are reduced as far as possible.	Where possible reduce flood risk overall
	Although the site is not in area identified as at risk of surface water flooding, some surrounding areas are.	Existing flood flow paths should be maintained.	Ensure flood risk is not increased elsewhere

Summary

4.1.8 Given the changes in tidal flood risk and climate change allowances since the publication of the SFRA, an update will need to be undertaken to support future versions of the Local Plan. This will be used to update this document.

4.1.9 However, from the information currently available, the allocation of sites within the Worthing Local Plan in areas of flood risk is considered to be justified and the Sequential Test and Exception Test (where required), as set out in the revised NPPF, have been passed at this stage.

4.1.10 Any future planning applications will need to be accompanied by detailed FRAs (where required) that meet the requirements of the revised NPPF and relevant policies in the Worthing Local Plan.

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