

Flood Risk Sequential Test

Land Adjacent to 18 Queens Lane, Arundel

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1. Introduction

- 1.1. This Sequential Test has been prepared in support of a detailed planning application for the development of two dwellings on land adjacent to 18 Queens Lane, Arundel, BN18 9JN (referred to hereafter as 'the site').
- 1.2. The site is located within the administrative area of Arun District Council (ADC) and currently forms part of the residential curtilage of an existing dwelling (18 Queens Lane) which is located to the north-east of the site.
- 1.3. The site is open and contains a small garage close to the southern boundary with Queens Lane. The site is bounded to the southwest by a farm and its associated agricultural buildings, and a small watercourse runs along this boundary. To the north is a Telephone Exchange, and land to the south is in agricultural use.
- 1.4. Access to the site is provided via Queens Lane.
- 1.5. The site is located within the settlement boundary of Arundel and is currently used as a residential garden. The site is in a sustainable location, close to facilities and services within Arundel including retail, leisure, religious, employment and education provision.
- 1.6. According to the Environment Agency's online map for flooding, the site is located within Flood Zone 3, and the map provided with the Council's Engineer's Comments confirms that a small part of the south of the site is in Flood Zone 3b.
- 1.7. The application seeks consent for: "*Demolition of garage and erection of two dwellings with associated car parking and landscaping*" (Ref: AB/136/21/PL).
- 1.8. This application is identical to an application approved in December 2018 (ref: AB/73/18/PL) which also sought consent for two residential dwellings following demolition of the existing garage.
- 1.9. Whilst the proposals are considered minor (under 10 dwellings), for the purposes of flood risk, conformity with the Sequential Test is still required as the development would result in a net increase in the number of dwellings at the site.
- 1.10. Following confirmation from the Council that a Sequential Test would be required, Savills sought to agree the proposed parameters for the identification of alternative sites. A letter was provided to officers in March 2022 setting out the expected search parameters, and these were subsequently agreed through an email response from the Case Officer dated 22 March 2022.
- 1.11. This Sequential Test Statement will first set out the methodology for the identification of alternative sites in Section 2, followed by assessments of the identified sites in Section 3. The document will conclude that no other suitable sites are readily available and that the Sequential Test has therefore been passed. As required by the National Planning Policy Framework (NPPF) the document will then provide details that the Exceptions Test has also been passed for the proposed development.

2. Methodology for the Identification of Alternative Sites

- 2.1. The National Planning Policy Framework (NPPF), revised in July 2021, sets out the relevant requirements with regard to undertaking development in areas identified at potential risk of flooding, such as the site at 18 Queens Lane.
- 2.2. Paragraph 167 states that:
- "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
 - b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
 - d) any residual risk can be safely managed; and*
 - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan."*
- 2.3. As set out in the NPPF, *"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere"* (Paragraph 159). Directing development away from areas at highest risk is the crux of the Sequential Test, and making a development safe without increasing flood risk elsewhere is the basis for the Exceptions Test.
- 2.4. Whilst the proposed scheme will remodel the site so that it is not at risk of flooding and does not increase flood risk elsewhere, procedurally the applicant needs to demonstrate that the proposals for the site could not be delivered elsewhere in an area at lower risk of flooding, whilst having the same results and benefits.
- 2.5. The procedure for completion of undertaking the Sequential and Exceptions Test for sites is set out within the Planning Practice Guidance (PPG) which sits alongside the NPPF. The PPG recommends that applicants should contact the relevant Local Planning Authority (LPA) to discuss the search area and parameters which should be used for alternative sites for the proposed developments.
- 2.6. As mentioned, the proposed search parameters were agreed with Arun District Council (ADC) in March 2022.

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Search Parameters for Alternative Sites

2.7. There are four key aspects that were considered relevant when setting the search parameters for the assessment of alternative sites through the Sequential Test process:

- Location/geographical area over which the test is to be applied
- Capacity
- Flood Risk
- Availability

2.8. The understanding of these factors is set out below.

Location/Geographical Area

2.9. The PPG states that, *"for individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed"* (033 Reference ID: 7-033-20140306).

2.10. The PPG continues by stating: *"for some uses this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Local Plan policies, such as the need for affordable housing within a town centre, or a specific area identified for regeneration. For example, where there are large areas in Flood Zones 2 and 3 and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives"* (033 Reference ID: 7-033-20140306). Paragraph 033 of the PPG concludes by saying that a pragmatic approach should be taken when undertaking the Sequential Test.

2.11. The site is located within the settlement boundary of Arundel, and this was therefore suggested by ADC as a reasonable search area. Given the size of the site and proposal, this is considered an appropriate search area.

Capacity

2.12. The required test of the NPPF is whether an alternative site is *"appropriate for the proposed development"* (Paragraph 158). For the purposes of this assessment, a comparable site that could be suitable for development is regarded as a site capable of accommodating a similar level, density and type of development and is therefore of a comparable size.

2.13. The applicant's proposal is for two residential dwellings on a site of approximately 100 sqm. It is recommended that the Sequential Test search considers sites with a capacity of +/- one dwelling, equating to between one and three dwellings, or a site size of between 50 and 150 sqm.

Availability

2.14. The PPG notes that a pragmatic approach on the availability of alternative sites should be taken. Reasonably available sites must be both 'deliverable' and 'developable' as defined in the NPPF:

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"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

And

"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

- 2.15. Various factors were assessed within the Sequential Test to determine whether each site had a reasonable prospect for delivering housing within five years. This included current use of the site, any current proposals or constraints to delivery, and whether there was a reasonable prospect of any constraints being overcome.
- 2.16. The ownership of alternative sites was also considered using online land ownership data.
- 2.17. The collation of this information provided a robust method to ensure that it was possible within the Sequential Test to determine whether a site should be considered available for development.

Flood Risk

- 2.18. For the purposes of the assessment the Environment Agency's online flood map for planning has been used to determine the flood risk of sites. The PPG states that the sequential approach to locating development at lower flood risk should be applied to all sources of flooding, including development in an area which has critical drainage problems, and where the proposed location of the development would increase flood risk elsewhere.
- 2.19. Any site which is considered likely to increase flood risk elsewhere because of development, or which is at a greater risk of flooding than the applicant's site should not be considered as a reasonable alternative.

3. Stage One – Assessment of Allocated Sites

- 3.1. The Arun Local Plan 2011-2031 was adopted in July 2018 and contains policies to guide decisions on planning, development and regeneration activity over the plan period. As the plan was adopted less than five years ago, in accordance with national planning policy, it is considered up to date.
- 3.2. The Local Plan states that Arun District is characterised by a distinctive settlement pattern and varied landscape, with the areas of largely undeveloped land surrounding the settlements contributing towards one of the District's key assets (Paragraphs 7.1.1. and 7.1.2). The Plan continues by stating that the key to the protection of the countryside and landscape is the identification of the Built-Up Area Boundary, which is a policy definition which defines urban areas from that of the countryside (Paragraph 7.1.5). Outside of the defined built-up boundary, it is understood that development would be restricted to that which is required to support the intrinsic character of the countryside, meaning the majority of new residential development will be sought within the built-up areas across the Plan Period. Arundel has a defined Built Up Area Boundary as set out within the Policies Maps from the Local Plan.
- 3.3. Within Chapter 12 the Local Plan contains a number of housing allocations which are anticipated to deliver 10,750 dwellings across the Plan Period. The Local Plan contains 11 housing allocations:

Table 3.1 Local Plan Allocations

Reference	Location	Number of Units
SD1	Pagham South	400
SD2	Pagham North	800
SD3	West of Bersted	2,500
SD4	Littlehampton – West Bank	1,000
SD5	Barnham/Eastergate/Westergate	2,300
SD6	Fontwell	400
SD7	Yapton	500
SD8	Ford	1,500
SD9	Angmering North	800
SD10	Climping	300
SD11	Angmering South and East	250

- 3.4. None of these strategic allocations are considered as suitable alternatives to the proposed development as none are located within the settlement boundary of Arundel, which is the defined search area for the Sequential Test.

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- 3.5. Arundel is also a designated Neighbourhood Planning Area and has an adopted Neighbourhood Plan Review 2018-2031 (October 2019) and saved policies from the Neighbourhood Plan 2014-2029. The Neighbourhood Plan documents also allocate land in Arundel for residential development. These allocations include:

Table 3.2 Neighbourhood Plan Allocations

Reference	Location	Number of Units
AR2	Land off Ford Road	90
AR3	Land at Fitzalan Road ('Blastreat and Greenhurst')	24
AR4	The Police Station, The Causeway	12
Saved Policy 4	Land at River Road and the Former Castle Stables, Arundel Castle	29

- 3.6. None of these neighbourhood allocations are considered suitable alternatives to the proposed development as they have a significantly larger capacity than the defined search parameters for the Sequential Test.
- 3.7. As a result, all housing allocations contained within the adopted Local Plan and Neighbourhood Plan have been discounted from the Sequential Test.

4. Stage Two – Assessment of Non-Allocated Sites

- 4.1. In order to provide a robust assessment, it is important to consider sites within Arundel which are not allocated for residential development within the adopted Arun Local Plan policies.
- 4.2. In order to find any potential alternative sites, evidence has been gathered from a variety of sources, including:
- Housing and Economic Land Availability Assessment (HELAA)
 - Brownfield Land Register (BLR)
 - Zoopla Property/Land Search
 - Rightmove Property/Land Search
 - Local Land Agents

Housing and Economic Land Availability Assessment (HELAA)

- 4.3. The HELAA is a technical report produced by the Council which supports the adopted planning policies and emerging policy documents. It provides an assessment of sites that could contribute to the future supply of housing and employment land within the authority area.
- 4.4. The HELAA appendices for Arundel contained a total of 17 sites. Details of these can be found within the table contained in Appendix 1.
- 4.5. Of the 17 sites, four were considered deliverable or developable, and therefore the HELAA attributed an anticipated capacity. The remaining sites were considered to not be deliverable or developable and therefore no capacity was attributed, however the HELAA contained a site area. Based on this information all the sites contained in the HELAA for Arundel are considered too large to be suitable alternative to the proposed development for the purposes of the Sequential Test.
- 4.6. These sites have been discounted from the Sequential Test.

Brownfield Land Register (BLR)

- 4.7. The Council is required to produce and maintain a Brownfield Land Register (BLR) of previously developed sites in the authority area which are capable of being redeveloped or converted to provide residential development.
- 4.8. The latest BLR, published in December 2021, contains one site in Arundel named Electronic Sub Station, Ford Road. This site has a capacity for 36-38 dwellings as well as an existing planning permission for development. It is therefore not considered a suitable alternative or available site for the proposed development due to its proposed capacity and extant consent.
- 4.9. This site has been discounted from the Sequential Test.

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Zoopla and Rightmove Property Search

- 4.10. As part of the Sequential Test, searches were made via the online property websites Zoopla and Rightmove. The searches looked for any property or land available within the defined settlement boundary of Arundel.
- 4.11. No sites were found within the settlement boundary which is the search area of the Sequential Test.

Local Land Agents

- 4.12. Finally, for the Sequential Test inquiries were made with local agents to determine if there was any property or land available within the defined settlement boundary of Arundel. This included a review of their websites and phoning the relevant offices to speak with an agent directly. The following agents were contacted as part of this Search:
- Michael Jones & Company
 - Glyn-Jones & Company
 - Fowlers Properties
 - Fowlers Estate Agents
 - Sims Williams
 - Henry Adams
 - Jackson Stops
- 4.13. Of these agents, only two had sites for sale within Arundel. The following sites were identified:

Table 4.1 Land for Sale via Local Agents

Agent	Site
Glyn-Jones & Company	20 Maltravers Street, Arundel, BN18 9BT
	1 Maltravers Street, Arundel, BN18 9BT
	9 Tarrant Street, Arundel, BN18 9DG
	Caen Stone Court, Queen Street, Arundel, BN18 9FE
Jackson Stops	18a Tarrant Street, Arundel, BN18 9DJ

- 4.14. Caen Stone Court, 20 Maltravers Street and 1 Maltravers Street are apartments/maisonettes for sale and therefore they were not considered suitable sites for development and were discounted from the Sequential Test.
- 4.15. As there was a potential for the two remaining sites to be suitable alternatives for the proposed development a detailed assessment was made for each:

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savills

Table 4.2 9 Tarrant Street Detailed Assessment

9 Tarrant Street, Arundel, BN18 9DG	
Site Name and Address	9 Tarrant Street, Arundel, BN18 9DG
Flood Risk	Flood Zone 1
Is the site at a lower risk of flooding?	Yes
Site Developable Area	33 sqm
Is the site suitable?	No, the site is too small.
Location	Inside the settlement boundary.
Site status in Local Plan	Not allocated
Existing Use	Retail
Constraints to development and delivery	The site for sale is a terraced shop and therefore could not be redeveloped for residential use. Whilst the shop could be converted to residential this would not allow for the inclusion of residential amenity space through either a garden or a balcony, and there would be no parking provision.
Can these be overcome?	No, the property could not easily be redeveloped into residential.
Is the site developable and deliverable?	The site is not developable as an alternative to the proposed development
Conclusion	The site is not reasonably available as an alternative for the proposed development as it is too small, currently within retail use, and is not developable or deliverable for the proposed development due to site constraints relating to the size of the site.

Table 4.3 18a Tarrant Street Detailed Assessment

18a Tarrant Street, Arundel, BN18 9DJ	
Site Name and Address	18a Tarrant Street, Arundel, BN18 9DJ
Flood Risk	Flood Zone 1
Is the site at a lower risk of flooding?	Yes
Site Developable Area	400 sqm
Is the site suitable?	No, the site is too large.
Location	Inside the settlement boundary.

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Site status in Local Plan	Not allocated
Existing Use	Residential
Constraints to development and delivery	The site is located inside the Arundel Conservation Area and adjacent to a listed building. According to a recent planning application for reconfiguration of the building (Ref: AB/50/19/PL), its history is strongly linked to the neighbouring Sparks Yard Listed Building, because it was built as a store and is included within the Listing Description. The Officer's Report for this application describes it as: <i>"an attractive two storey structure which is located to the rear of the Sparks Yard building, in an area similar to a courtyard. It has a pitched roof with a number of rooflights. The relationship with the neighbouring Sparks Yard building plays an important element of its significance"</i> (Page 3).
Can these be overcome?	No, the property could not easily be demolished for redevelopment into multiple houses. The configuration of the amenity garden would also not allow for the division of the building into two properties.
Is the site developable and deliverable?	The site is not developable as an alternative to the proposed development.
Conclusion	The site is not reasonably available as an alternative for the proposed development as it is too large and is not developable for the proposed development due to the heritage site constraints.

4.16. These assessments demonstrate that there are no sites for sale from local land agents of comparable estimated capacity which are suitable for development, having regard to planning policy status, with no physical or environmental constraints, in an area of lower risk of flooding, and which are reasonably available as an alternative to the application site.

4.17. It is therefore concluded that the proposed application scheme passes the Sequential Test and is therefore in accordance with both National and Local Planning Policies. Therefore, provided that the Exception Test is passed, the application site is considered to be appropriate for the proposed application scheme.

5. The Exception Test

- 5.1. The Exception Test is a method 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.
- 5.2. The NPPF in Paragraph 163 states: *"If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood risk Vulnerability Classification set out in Annex 3".*
- 5.3. The NPPF then continues in Paragraph 164 to state:
- "To pass the exception test it should be demonstrated that:*
- i. *The development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
 - ii. *The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall."*
- 5.4. The EA's Flood Risk Mapping has indicated that the site is located partly in Flood Zone 3. As defined in Annex 3 of the NPPF, buildings used for dwelling houses are classified as 'More Vulnerable' development and can only be allowed in Flood Zone 3 if the Exception Test is passed.
- 5.5. The proposals will bring a number of wider sustainability benefits.
- 5.6. The site is located within walking distance of Arundel Town Centre, which has a number of retail, employment and leisure opportunities. It is also located approximately 630 metres from Arundel train station with regular services, and within walking distance of a number of bus stops located near to the site. Furthermore, cycling parking will be provided for each dwelling as part of the proposed development. Therefore, the site is sustainably located where people can make the fullest possible use of public transport, walking and cycling, as set out within the NPPF.
- 5.7. In addition, the proximity within easy walking access of the facilities within Arundel will help maintain and improve the vitality and viability of the town centre.
- 5.8. The development of dwellings inside the built-up area of Arundel, whilst making efficient use of land, will also assist in protecting greenfield sites outside of the settlement by preventing the need for these to come forward for development.
- 5.9. The proposed development also represents an opportunity to make efficient use of the site by providing a high-quality residential scheme that responds positively to the surrounding character. The existing house at 18 Queens Lane will continue to have ample amenity garden space with the addition of the proposed development.

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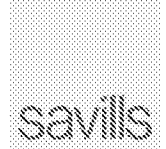
- 5.10. The latest Authority Monitoring Report (AMR) was published by Arun District Council (ADC) in January 2022. This states a land supply of **2.42 years**. Currently, there is a significant shortfall against the five year housing land supply required by the NPPF, and it should be noted that the site was included within the 'Small Site Commitments As At 31 March 2021' due to the previous planning consent. Therefore, the delivery of two dwellings at the site will make a material contribution to this housing supply.
- 5.11. Finally, the dwellings have been designed as family accommodation, providing three bedrooms each, which is in significant demand in Arundel and the authority area of Arun.
- 5.12. It is considered that the importance of this development in delivering these sustainability benefits is clear and that the first element of the Exception Test is passed.
- 5.13. The application documents have demonstrated that the development is capable of being delivered without putting the future users at the site at an unacceptable risk of flooding or increasing the flood risk off-site further up or downstream.
- 5.14. The proposals have been designed with garages on the ground floor and living accommodation within the first and second floors of the houses.
- 5.15. In line with the NPPF and supporting PPG, the proposed development has been assessed to having a lifetime of 100 years. The Flood Risk Assessment (FRA) submitted with the planning application outlines that, under an extreme fluvial flood event with a 1 in 100-year return period (including a 25% increase in peak river flow), the proposed dwellings are located outside of the fluvial flood extents.
- 5.16. In addition, to ensure that the land raising does not compromise the storage of flood compartment, the proposals seek to lower land within the rear garden, adjacent to the drainage ditch, thus ensuring that the proposals will not increase flood risk elsewhere as a result of floodwater being displaced by the development.
- 5.17. With respect to tidal risk of flooding, the FRA demonstrates that the development is currently protected under a tidal flood event with a 1 in 200-year return period.
- 5.18. The supporting Flood Risk Assessment submitted with the planning application concludes that the occupants of the proposed development will be safe and that the development will not increase the risk of flooding elsewhere. As a result, it is considered that the second element of the Exception Test is passed.

6. Summary and Conclusion of Sequential Test and Exception Test

- 6.1. This Sequential Test and Exception Test has been prepared in support of a detailed planning application for the demolition of garage buildings adjacent to 18 Queens Lane, Arundel. The current proposals for the site seek: *"Demolition of garage and erection of two dwellings with associated car parking and landscaping"* (Ref: AB/136/21/PL).
- 6.2. This application is identical to an application approved in December 2018 (ref: AB/73/18/PL) which also sought consent for two residential dwellings following demolition of the existing garage.
- 6.3. The site is located within the administrative area of Arun District Council (ADC), and it currently forms part of the residential curtilage of an existing dwelling (18 Queens Lane) which is located to the north-east of the site.
- 6.4. The site is open and contains a small garage close to the southern boundary with Queens Lane. The site is bounded to the southwest by a farm and its associated agricultural buildings, and a small watercourse runs along this boundary. To the north is a Telephone Exchange, and land to the south is in agricultural use.
- 6.5. Access to the site is provided via Queens Lane.
- 6.6. The site is located within the settlement boundary of Arundel and is currently used as a residential garden. The site is in a sustainable location, close to facilities and services within Arundel including retail, leisure, religious, employment and education provision.
- 6.7. According to the Environment Agency's online map for flooding the site is located within Flood Zone 3, and the map provided with the Council's Engineer's Comments confirms that a small part of the south of the site is in Flood Zone 3b.
- 6.8. Whilst the proposals are considered minor (under 10 dwellings), for the purposes of flood risk conformity with the Sequential Test is still required as the development would result in a net increase in the number of dwellings at the site.
- 6.9. Following confirmation from the Council that a Sequential Test would be required, Savills sought to agree the proposed parameters for the identification of alternative sites. A letter was provided to officers in March 2022 setting out the expected search parameters, and these were subsequently agreed through an email response from the Case Officer dated 22 March 2022.
- 6.10. The National Planning Policy Framework (NPPF), revised in July 2021, sets out the relevant requirements with regard to undertaking development in areas identified at potential risk of flooding, and states *"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)"* (Paragraph 159). This is the crux of the Sequential Test. Therefore, whilst the proposed scheme will remodel the site so that it is not at risk of flooding and

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does not increase flood risk elsewhere, procedurally the applicant needs to demonstrate that the proposals for the site could not be delivered elsewhere in an area at lower risk of flooding whilst having the same results and benefits.

- 6.11. The search parameters for the Sequential Test were agreed with Arun District Council (ADC) through written correspondence in March 2022. In summary these included:
- The Arundel settlement boundary as the location/ geographical area of the search
 - sites with a capacity of +/- one dwelling, equating to between one and three dwellings, or a site size of between 50 and 150 sqm
 - The availability, deliverability and development potential of each site
 - The flood risk of each site
- 6.12. The first stage of the Sequential Test involved the assessment of allocated sites and sites contained within the Housing and Economic Land Availability Assessment (HELAA) and Brownfield Land Register (BLR). Following this, the second stage of the Sequential Test assessed all other sites available for sale via relevant websites (Rightmove and Zoopla) and in discussion with local agents.
- 6.13. The majority of sites identified through this search were too large for agreed capacity for the Sequential Test or were located outside of the Arundel settlement boundary. Furthermore, many of the properties for sale within the search area were apartments or maisonettes which were not considered suitable alternative development land sites.
- 6.14. As a result, no sites were found to be available, deliverable or developable taking into account the Sequential Test search parameters and the proposed development. Therefore, the application scheme passes the Sequential Test as set out within the NPPF and PPG.
- 6.15. Section 5 of this Statement demonstrated that the application proposes a number of benefits in accordance with sustainable development which is at the heart of the NPPF. Furthermore, the site-specific Flood Risk Assessment, submitted in support of the planning application, demonstrates that the proposal will be safe from flooding for its lifetime, and will not increase flood risk elsewhere. Therefore, this Statement has demonstrated that the Exception Test has been passed.

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Appendix 1

HELAA and Brownfield Land Register Sites

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Appendix 1 Table 1 – HELAA and Brownfield Land Register sites

Site Reference (HELAA/LP/BLR)	Address	Reason for discounting from Sequential Test	HELAA Recommended Capacity	Parish/ Location	Gross Site Area (ha)	Developable Area (ha)	HELAA Conclusion
20AB13	Arundel Police Station The Causeway	Capacity too large	7	Arundel			Developable or Deliverable
RY7	Blastreet, Fitzalan Road	Capacity too large	15	Arundel			Developable or Deliverable
66	Land South of Stewards Rise	Capacity too large	186	Arundel			Developable or Deliverable
AB10	Greenhurst, Fitzalan Road	Capacity too large	9	Arundel			Developable or Deliverable
58	Electronic Sub Station (Land North East Of)	Capacity too large		Arundel	0.58	0.46	Not currently developable
AB12	Land South of A27, North Canada Road	Capacity too large		Arundel	0.94	0.75	Not currently developable
56	Mill House Farm	Capacity too large		Arundel	10.12	6.07	Not currently developable
AB11	Electronic Sub Station (Land South Of)	Capacity too large		Arundel	1.06	0.85	Not currently developable
61	Tower House Allotments, Maltravers Street	Capacity too large		Arundel	0.17	0.17	Not currently developable
RU6	Fitzalan Road West	Capacity too large		Arundel	0.16	0.16	Not currently developable

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AB3	Land at Cemetery, London Road	Capacity too large		Arundel	0.34	0.34	Not currently developable
AB4	Land South West of St Philip Catholic Primary School	Capacity too large		Arundel	0.25	0.25	Not currently developable
AB9	Telephone Exchange, Fitzalan Road	Capacity too large		Arundel	0.22	0.22	Not currently developable
64	Allotment Site, Fitzalan Road	Capacity too large		Arundel	0.74	0.59	Not currently developable
65	Garage Site, Ford Road	Capacity too large		Arundel	0.15	0.15	Not currently developable
57	Land off Fitzalan Road	Capacity too large		Arundel	1.6	1.28	Not currently developable
59	Horse Fields, Torton Hill Road	Capacity too large		Arundel	2.15	1.5	Not currently developable
115	Electronic Sub Station, Ford Road	Capacity too large; Planning Permission Granted	36-38	Arundel	0.43	0.43	

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