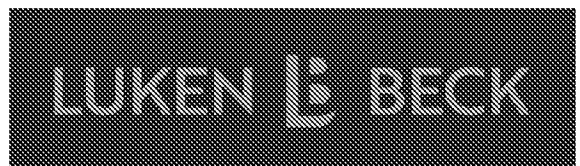


SEQUENTIAL TEST

LIDSEY LODGE FARM, LIDSEY

17th February 2022





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Managing Director: Ian Johnson B.Sc (Hons), M.A., PG Dip UD, M.R.T.P.I.
Exec Consultants: Graham Beck JP, M.B.A., LL.B.(Hons), B.A.(Hons), Dip.T.P.,
M.R.T.P.I., M.C.M.I.
Mark Luken M.B.A., B.Sc.(Econ) (Hons), Dip.T.P., M.R.T.P.I., M.C.M.I





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Appendix A: HELAA Summary Report for Individually Assessed Sites

Appendix B: Land & Commercial Property - search results

1. Introduction

- 1.1 This sequential test has been produced in support of the proposed development involving the demolition of existing agricultural buildings and removal of concrete yards and the erection of 8 new homes with associated works for access, parking, landscaping and ecological provisions.
- 1.2 In carrying out the sequential test regard has been given to the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) and the guidance provided by the Environment Agency in their document 'Demonstrating the flood risk Sequential Test for Planning Applications'.
- 1.3 The purpose of the sequential test is solely to consider the availability of alternative sites for the development as part of the examination of flood risk. This document therefore complements the appraisal within the Site Specific Flood Risk Assessment (SSFRA) supplied by Bright Plan Civils and submitted with this application but is a standalone sequential appraisal concerned with the identification of sites at a lower 'risk' of flooding than the application site.
- 1.4 This appraisal supports a resubmission of refused application AL/75/21/PL. While several reasons were given for refusing permission the first relates to flood risk (in future year scenarios) and the lack of a sequential site assessment. Specifically, the wording of the reason was;

"The site is in an area which is predicted to be Flood Zone 3 by the year 2111 and there is no guarantee that existing sea defences will be maintained. A sequential site assessment is required to demonstrate that there are no other suitable sites in areas of lower flood risk elsewhere in the district. As no sequential assessment has been provided, the application is in conflict with Arun Local Plan policy W DM2, the National Planning Policy Framework and associated guidance."

Applying this Sequential Assessment

- 1.5 The following key parts of the Framework should be noted carefully in this case. Paragraphs 162, 163 and 164 of the NPPF sets out that (our emphasis in bold);

"162. The aim of the sequential test is to steer new development to areas with **the lowest risk of flooding from any source**. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. **The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.**

163. 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.

164. The application of the exception test should be informed by a strategic or site-specific flood risk assessment..."

1.6 The site is currently identified as Flood Zone 1. While the site is identified by the ADC 2016 Strategic Flood Risk Assessment to be in Future Flood Zone 3a at 2111 there are significant material considerations which identify the site is, in fact at a very low residual risk of flooding in future scenarios and therefore "safe for the lifetime of the development". These include the findings of the previous Site Specific Flood Risk Assessment, the lack of objection from the Environment Agency to the previous scheme, and the recent appeal decision on a nearby site with the same circumstances.

1.7 In light of the more recent appeal decision in respect of BE/109/19/OUT on which very similar characteristics of impact were considered by the Inspector we note that the Council should be advised to revisit;

- Particular considerations and policy (national and local) related to the assessment of 'risk' in terms of flooding
- The need for, and weight to be given to this sequential appraisal as a result

1.8 Noting the Council's previous reason for refusal relates to future design year flooding, the previous (Bright Plan Civils) SSFRA concluded that;

"3.1.1 The area of proposed development is in Flood Zone 1. In view of this, the application of the sequential test is not required.

3.1.2 Investigation of existing site levels from the topographic survey ... and the predicted fluvial and tidal flood levels provided in the Environment Agency Product 4 Response in Appendix E shows that the site is wholly elevated above existing and predicted fluvial flood levels. In addition the site is elevated above existing and predicted tidal flood levels in a defended scenario.

3.1.5 ...As the site is shown to be protected by sea defences for the lifetime of the development, tidal flood risk is residual only and therefore mitigation measures address this risk as detailed within Section 5.2 - Mitigation.

3.2.1 The Exception Test is not required, as the site is located in Flood Zone 1 and elevated above fluvial and tidal flood risk levels.

AL/75/21/PL: EA Response & ADC's assessment

- 1.9 The Environment Agency, having given consideration to the SSFRA, raised no objection previously.
- 1.10 However, the Council remained concerned about the extent of Flood Zone 3a at 2111 (as part of an undefended scenario) and about the reliance on existing sea defences in future year scenarios (specifically "no guarantee that existing sea defenses will be maintained"). The Council cited policy W DM2 but, notwithstanding, the appropriate approach was to consider the part of policy W DM2 which states;

*"All development proposals must take account of relevant Surface Water Management Plans, Catchment Flood Management Plans **and related Flood Defence Plans** and strategies such as the Lower Tidal River Arun Strategy."*

- 1.11 Accordingly, the Council's reliance on their Strategic Flood Risk Assessment at the expense of a SSFRA was not in line with the provisions of National Planning Policy (see para. 167) which requires assessments deal in **residual** risk.

Relevant Planning Appeal BE/109/19/OUT

- 1.12 Having contended similar concerns in its handling of 'Land East of Shripney Road' (BE/109/91/OUT) the Inspector considered the residual risk in respect of the maintenance of [the same] existing tidal sea defences applicable in this case concluding;

"28. From the information before me, there appears to be no reasonable likelihood of the tidal flood defences being allowed to fail and it seems in the best interests of all concerned that they will be suitably maintained into the future. This includes through the implementation of the Shoreline Management Plan providing for a plan for the inspection, management and maintenance of coastal flood defences."

"30. ...the risk of any significant future flooding of the site as a result of climate change would be very low taking account of the existence of tidal flood defences which can reasonably be expected to be maintained and retained for the lifetime of the development"

"33. I am satisfied, therefore, that the proposal would not result in any significant flood risks, including for future residents..."

- 1.13 The Council will be aware that setting aside the allowed appeal decision the Inspector also found the Council's approach had been fundamentally unreasonable and so allowed an award of costs on flooding arguments it had brought. The Inspector noted as follows;



"13. The parties agree that it is necessary to consider the implications of climate change. The Council's Strategic Flood Risk Assessment indicates that the site would be at risk of flooding, based on 2061 and 2115 scenarios, albeit in the absence of existing flood defences. The Council has not provided any detailed evidence to counter the evidence and case put forward in the appellant's Flood Risk Assessment Addendum (along with the evidence provided in its original Flood Risk Assessment) provided with the appeal including the case argued by the appellant that the site would not be at any significant risk of flooding based on the existence of the flood defences.

14. The Council's evidence both in writing and orally at the hearing did not provided [sic] any substantive arguments on whether for any reason the existing flood defences might be at risk in future years. At the hearing the Council also confirmed that it's objection related solely to the matter of flooding following climate change and not matters related to drainage issues on and adjacent to the site..."

16. Given the lack of supporting evidence to justify the Council's objection in this regard...the Council has behaved unreasonably...."

- 1.14 These factors should be carefully considered by ADC. As set out in the above and by the submitted FRA there is a very low residual risk to the site from flooding now or in the future. This means that, while all sources of flood risk should be considered by the Sequential Test, this site appears ultimately to be considered (as a result of Site Specific FRA) to be in Flood Zone 1 and to have very low risk in future when taking account of Climate Change scenarios.

2. The Site & Proposed Development

- 2.1 The site location and description are detailed in full in the othersubmitted documents supporting the application including the FRA, Design and Access Statement and Planning Statement.

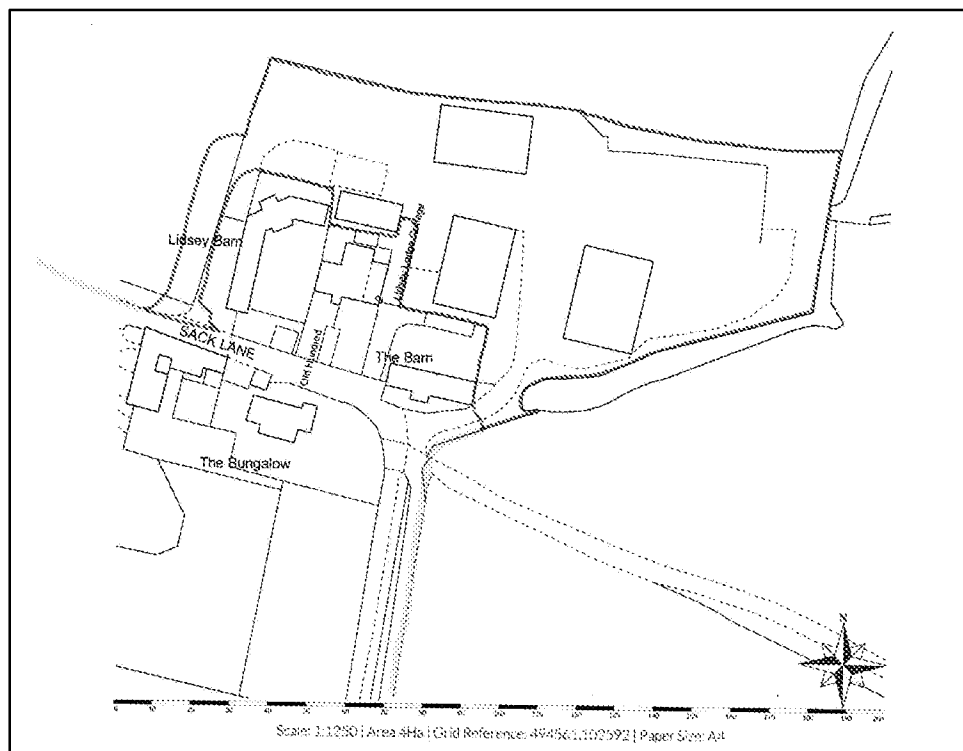


Figure 1: Site Location Plan showing site extent

- 2.2 The proposal seeks full planning permission. The development scheme includes 8 no. new residential dwellings, development classified as more vulnerable by practice guidance on flooding matters.

3. Sequential Test Approach

Introduction

- 3.1 When undertaking the Sequential Test and comparing reasonably available sites in line with the aforementioned guidance with the application site, the Environment Agency advises that:

"...Site should be compared in relation to flood risk Local Plan status; capacity; and constraints to delivery including availability, policy restrictions, physical problems or limitations, potential impacts of development, and future environmental conditions that would be experienced by the inhabitants of the development."

- 3.2 The approach and the key criteria used for comparison are detailed below:

Locational Criteria

- 3.3 Planning Practice Guidance entitled "**Applying the Sequential Test to individual planning applications**" advises:

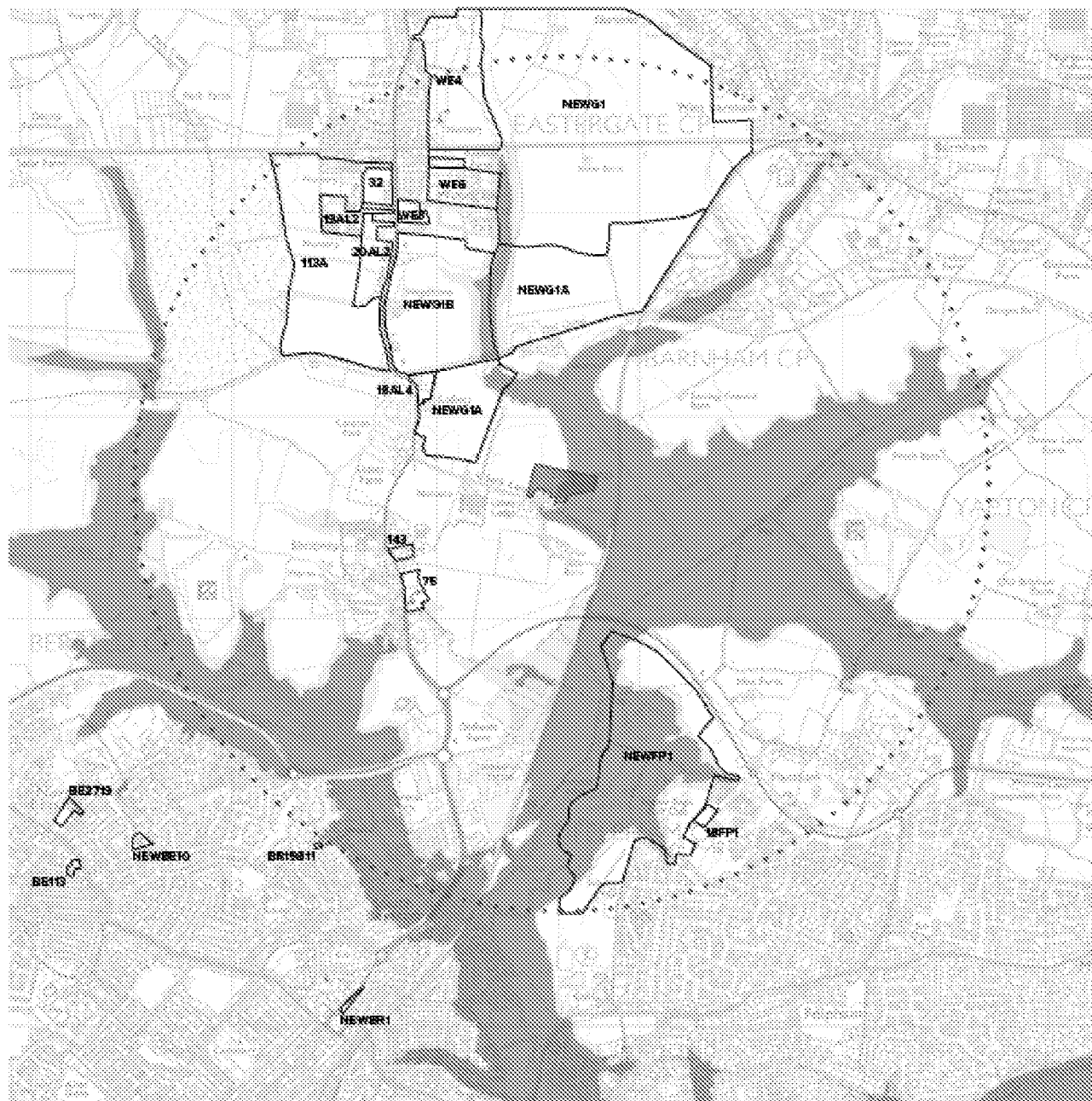
"For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments 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 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives."

(Paragraph: 033 Reference ID: 7-033-20140306)

- 3.4 A proximate development site (ADC ref: BE/109/19/OUT) undertook a Sequential Test for Flood Risk in early 2020 based on a scoping area agreed with the Council. A similar area has been used in this assessment as;
- The two sites are located only ~500m apart
 - Physical and spatial policy circumstances are very similar
 - The previous assessment identified a satisfactory quantum and range of sites

Identification of Sites

- 3.5 To identify potential alternatives to the application site to be assessed by the Sequential Test we have utilised the following sources of evidence:
- The latest Arun District Council Housing and Economic Land Availability Assessment (HELAA, 2021)
 - The Arun Local Plan & Proposals Map (2018)
 - Rightmove search for Land & Commercial Property with 3 miles of the site
- 3.6 Searches for Land and Commercial Property were carried out within a 3 mile radius of the site. There were no results for development/sites of equivalent size or smaller and only four sites listed for sale. For completeness we describe the latter below.
- 3.7 Two of the sites are discounted as they are offered for sale as a Commercial Use sites, one of which is part of an policy allocation for such.
- 3.8 One site (Hill Lane, Barnham) was returned with no details on conditions or basis for sale. That site is also rather larger, reported to be 1.5 hectares (meaning a yield of 30-45 houses) of undeveloped greenfield land; it is very well separated from Barnham's Built Up Area Boundary and is directly adjacent to the Conservation Area which covers a compact satellite of settlement; the site forms part of the CA's immediate rural character setting. It is not comparable, has significant other policy constraints, and importantly not been promoted for housing to the Council's HELAA. It has therefore not been considered further.
- 3.9 The final site (Compton Drive, Felpham) was noted to be too small to accommodate any residential development and appears to be a residual part of shared landscaping space within an existing residential estate.
- 3.10 Copies of the search results are provided in Appendix B.
- 3.11 The principle source of alternative sites assessed by the Sequential Test Assessment is therefore taken from the Arun District Council Housing and Economic Land Availability Assessment (HELAA) updated recently in 2021. Sites from the HELAA and within the agreed area / scope are mapped in Figure 2.



**Figure 2 - Identified Alternative HELAA Sites Assessed (map excludes "Not Currently Developable" category sites);
Application site shown in red**

(Basemap taken from Arun SFRA 2016 showing extent of current flood zones 2 and 3)

~~From Rick Ciferri~~

3.12 The Planning Practice Guidance advises when the Sequential Test is normally to be applied stating that:

Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic

Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change).
(Paragraph: 033 Reference ID: 7-033-20140306)

- 3.13 The SSFRA confirms EA flood mapping for planning shows the site is situated within Flood Zone 1 and notes the boundary areas to the southeast and northeast of the site are shown to be at the boundary of Flood Zone 2 and 3, and are shown to be below flood levels, these areas are not within the proposed development area and are to be returned to grass and an ecological buffer zone from the existing impermeable hard standing.
- 3.14 In light of the above the developed area of the site sits within Flood Zone 1 and accordingly sites which sit within Flood Zone 2 & 3 have been discounted as alternative locations for development (See Figure 2).
- 3.15 The Arun District Council Strategic Flood Risk Assessment (2016) assesses the future implications of climate change on development and maps the flood risk expected under climate change for fluvial and tidal / coastal flood risk.
- 3.16 Appendix D: Climate Change Mapping of the SFRA provides hydraulic mapping which compares current flood risk with potential future flooding arising through climate change. This includes:
- Future Flood Zone 3a (2031) + 15% flows
 - Future Flood Zone 3a (2061) + 30% flows
 - Future Flood Zone 3a (2111) + 45% flows
- 3.17 The majority of the proposed development site sits within Future Flood Zone 3a (2111) and partially within Future Flood Zone 3a (2061) (See Figure 3).
- 3.18 Other sites which are liable for future flooding as a result of climate change have been discounted as alternative locations for development.

Housing Capacity

- 3.19 Arun District Council has insufficient land to meet its 5 year housing land supply requirement. There is no evidence that either housing land supply or delivery rates are likely to improve in the near term.
- 3.20 A recent appeal decision in respect of Land South of Barnham Station, Barnham¹ confirmed the housing supply position to be approximately 2.63 years and the Inspector noted the “current

¹ PINS ref: APP/C3810/W/21/3273087; ADC ref: BN/142/20/OUT

scale of the shortfall of deliverable housing land to meet identified housing need in Arun District is therefore substantial."

- 3.21 In light of the need to provide housing alternative sites should have the capacity to provide a similar quantum and range of housing types as the proposal. As the scheme is below the threshold (as confirmed by the Planning Design and Access Statement) to require affordable housing provision in line with *Policy AH SP2* the alternate sites do not need to be of a size, necessarily to provide such.
- 3.22 The indicative mix of housing reflects the requirement for a "balanced mix of market tenure dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations" in Policy H DM1.
- 3.23 Accordingly, sites which are not of a similar or larger size to the proposals are discounted (this removes sites for single, or low numbers of dwellings e.g. <1-6). Noting that even sites of a similar size will not be nearly sufficient by themselves to resolve the above substantial housing shortfall (of 4,778 dwellings).

Planning Policy

- 3.24 The comparison sites have been assessed to determine if there are any planning policy designations that would affect the delivery of housing. Identified sites have been reviewed against the land use policies of the Arun District Local Plan (2018) and the corresponding Proposals Map. Salient policies include:

Policy EMP DM1: Employment Land: Development Management advises that the Council will 'seek to protect and enhance existing employment sites and premises.' All sites that are **existing employment sites are therefore discounted as alternative locations for development.**

Policy EMP SP3: Strategic Employment Land Allocations advises that strategic employment land identified will be protected over the plan period. **All sites that are strategic employment sites are therefore discounted as alternative locations for development.**

Policy SD SP3: Gaps between Settlements stipulates that there will be a presumption against the development of sites with this designation on the Proposals Map. This is to retain a sense of openness and prevent the coalescence of settlements over the Plan period. **All sites that are designated as gaps between settlements are discounted as alternative locations for development.**

Policy OSR DM1: Open Space, Sport & Recreation advises that the Council will look to protect existing outdoors spaces. **All sites that are allocated areas of open space are therefore discounted as alternative locations for development.**

Policy H SP1: Housing Requirement provides details of strategic housing allocations which are necessary for meeting the Council's housing land requirement.

Such sites are not by definition windfall sites and will not address the shortfall of housing land.

All sites sitting within allocation SD5 Barnham / Eastergate / Westergate have therefore discounted as alternative locations for development.

- 3.25 There are also a number of policy designations that have been identified which would have a material impact on a site. These are:

Policy TSP3: Safeguarding the Main Road Network in which land identified as necessary for the strategic and supporting road network will be protected from development. Sub-clause i) A29 Realignment and access through the Barnham / Eastergate / Westergate site allocation runs through or in close proximity to a number of sites and as such may impact their deliverability.

Policy ENV DM3: Biodiversity Opportunity Area identifies sites which can retain and sympathetically incorporate local important habitats. While this does not prevent development, it could potentially reduce the density of development.

- 3.26 For the purposes of the Sequential Test only deliverable sites (1-5 years) should strictly be included. Developable sites under NPPF terminology are potentially likely to come forward in 6-10 years and as such are 'not available' or likely to deliver housing / affordable housing to meet the identified shortfall. Nevertheless, the developable sites from the HELAA have also been considered in this appraisal on their other attributes as well.



4. Assessment of Alternative Available Sites

- 4.1 Table 2 below contains a list of deliverable and potentially developable sites identified by the evidence sources details set out above by this report.
- 4.2 The table assesses each site against the location and site / surrounding criteria identified and discounts sites that do not meet these initial requirements.
- Not have a policy designation for an alternative land use
 - Identified as either 'Deliverable' or 'Developable' in the Arun District Council HELAA (2021)
 - Located outside of Flood Zone 2 & 3
 - Not identified in a SFRA future climate change flood zone area
 - Able to deliver a comparable number of housing units (>6) and therefore range of housing types
- 4.3 Further to this initial overarching assessment the sites listed below were identified as meeting all of the above criteria and were subjected to a finer grain assessment to determine if they were sequentially preferable locations for development.
1. Land Adjoining Gordon Avenue West
 2. Land at Bridge Cottage & The Old Cottage
 3. Land north of Lees Yard, Lidsey Road
 4. Wings Nursery, Lidsey Road
 5. Land to the rear of Stockhearn Nursery

Table 2: Assessment of Alternative Sites

Site Name / Address	Evidence Base	Ref: No	HELAA Status	Planning Policy	Flood Zone	Future Flood Zone 3a	Size	Capacity	Further Assessment
Land at Manor Farm, Shripney	HELAAA	NEWBE8	Not Currently Developable	n/a	1	2111	2.48	87*	NO
The Cottage Nursery Violet Farm, Shripney	HELAAA	143	Commitment Site	n/a	1	2111	-	21**	NO
Land North West of Oldlands Farm	HELAAA	17BE1	Not Currently Developable	n/a	2 & 3	Present	2.6	91*	NO
Land at Oldlands Farm, Bognor Regis	HELAAA	BR1	Employment	Strategic Employment Site	1	2111	-	N/A	NO
Land West of Shripney Road	HELAAA	NEWBE11	Employment	Strategic Employment Site	1	2061	-	N/A	NO
LEC Airfield, Bognor Regis	HELAAA	PS3	Employment	Strategic Employment Site	2 & 3	Present	-	N/A	NO
Land Off Brooks Lane	HELAA	19FP1	Not Currently Developable	Gap Between Settlement	2 & 3	Present	5.1	179*	NO
Bognor Golf Course	HELAAA	NEWFP1	Developable	Gap Between Settlement	2 & 3	Present	58.12	1,045	NO
Land at Stanhorn Grove,	HELAAA	18FP1	Commitment Site	n/a	1	2111	0.5	18	NO
Westward Ho	HELAAA	17Y2	Not Currently Developable	n/a	1	-	0.71	25*	NO
Land east of Hoe Lane	HELAAA	21	Not Currently Developable	n/a	1	-	1.91	67*	NO
North Paddocks	HELAAA	17FP1	Employment Site (potential)	Gap Between Settlement	3	Present	-	N/A	NO
Land Adjoining Gordon Avenue West	HELAAA	NEWBR1	Deliverable	n/a	1	-	0.31	11	YES



Westside Supplies, 17-18 Durban Road	HELAAA	BR19811	Commitment Site	n/a	2 & 3	Present	0.08	14# NOTE: new app submitted BR/267/21/PL 24 units	NO
Bartons County Infant School, Romney Broadwalk	HELAAA	NEWBE10	Deliverable	Neighbourhood Plan Housing Site	1	2111	0.59	20	NO
Land Adjacent to Tesco Express	HELAAA	BE113	Deliverable	Neighbourhood Plan Housing Site	1	-	0.19	7##	NO
Site 6 Chichester Road	HELAA	BE2719	Commitment Site	n/a	1	-	0.27	15 NOTE: Change to RM application BE/27/19/PL outline approved in 2006 doesn't seem relevant to be considering this site further...	NO
93 North Bersted Street	HELAAA	NEWBE9	Not Currently Developable	Existing Open Space (Partial)	2 & 3	2111	1.2	42*	NO
Rookery Farm, North Bersted Street	HELAAA	119	Not Currently Developable	Existing Open Space (Partial)	1	-	0.67	23*	NO
Rookery Farm, 117 North Bersted Street	HELAAA	106	Not Currently Developable	Existing Open Space (Partial)	2 & 3	2111	1.12	39*	NO
Barnham/Eastergate / Westergate	HELAAA	NEWEG1	Strategic Housing Allocation	Strategic Housing Site Safeguarded Main Road Network	2 & 3	Present	135	1700	NO
Land South of BEW	HELAA	NEWEG1A	Strategic Housing Allocation	Strategic Housing Site	2 & 3	Present	56	600	NO

Land to East of Lidsey Road	HELAA	NEWEG1B	Strategic Housing Allocation	Strategic Housing Site	2 & 3	Present	31.7	425	NO
Land South of Sack Lane	HELAA	20AL3	Not currently developable	n/a	1	2061	75.67	590	NO
Land East of Shripney Road	HELAA	19AL5	Not currently developable	n/a	1	2111	9.14	320*	NO
Land north of Sack Lane	HELAA	20AL1	Not currently developable	n/a	1	-	1.1	39*	NO
Land west of Lidsey Road (Woodgate Nursery)	HELAA	20AL2	Deliverable	n/a	1	-	5.3	111	YES
Woodpecker Nursery	HELAA	21AL4	Not currently developable	n/a	1	-	3.06	107	NO
Land at Shripney Road	HELAA	75	Committed Site	n/a	1	2111	1.74	46^^	NO
Land Rear of Orchard Place	HELAA	20BE1	Not currently developable	n/a	3	present	1.25	44*	NO
Land at Bridge Cottage & The Old Cottage	HELAAA	18AL4	Developable	Strategic Housing Site (Partial)	1	-	1.18	27	YES
Land to the west of Westergate Street	HELAAA	113	Not Currently Developable	n/a	1	-	68.85	2,380*	NO
Land west of Westergate Street (Woodgate Nursey)	HELAAA	113A	Developable	n/a	2 & 3	Present	48	118	NO
Land north of Lees Yard, Lidsey Road	HELAAA	WE8	Committed Site	n/a	1	-	1.53	38^^^	YES
Ryefield Farm & Woodgate Centre, Oaktree Lane	HELAAA	WE6	Strategic Housing Allocation	Strategic Housing Site	2 & 3	Present	7.35	180^^^^	NO
Wings Nursery, Lidsey Road	HELAAA	32	Committed Site	n/a	1	-	2.6	55^^^^^	YES
Land to the rear of Stockhearn Nursery	HELAA	19AL2	Developable	n/a	1	-	3.05	64	YES

*indicative capacity based on 35 units per hectare as no figure is presented in the HELAA

**Permitted number of units in application reference BE/63/17/OUT



#Permitted number of units in application reference BR/90/18/PL
##Permitted number of units in application reference BE/104/21/PL
^ Submitted number of units in application reference AL/129/21/OUT
^^ Permitted number of units in application reference BE/109/19/OUT
^^^ Permitted number of units in application reference AL/21/20/OUT
^^^^ Submitted number of units in application reference AL/107/21/PL
^^^^^ Permitted number of units in application reference AL/32/19/OUT

5. Assessment of Individual Sites

5.1 Land Adjoining Gordon Avenue West (NEWBR1)

- 5.1.1 The site is identified in the HELAA (Site Ref: NEWBR1) as a 'deliverable site'. The site sits within the Greater Bognor Regis Urban Area and is currently overgrown and underutilized amenity space. The HELAA Assessment Summary Table (See Appendix A) advises that the site is at risk of ground water flooding.
- 5.1.2 The site does not benefit from planning permission and no applications have been submitted for the suggested yield of 11 dwellings. Even if Land Adjoining Gordon Avenue West were to come forward in a reasonable timescale, it would contribute very little to the very large shortfall of housing land supply currently found in ADC. As such, the site has been discounted as there is a significant need for both this site and the application site.

5.2 Land west of Lidsey Road (Woodgate Nursery) (20AL2)

- 5.2.1 The site is identified in the HELAA (Site Ref: 20AL2) as a 'deliverable site'. The site is outside but adjoining the settlement boundary of Woodgate. The is in agricultural use, consisting of two parcels of land surrounded by hedging.
- 5.2.2 The HELAA Assessment Summary (Appendix A) advises that potential constraints for the site include potential for groundwater flood risk and presence of archaeology. The site does not benefit from planning permission. An outline planning application for part of the HELAA site has been submitted for up-to 95 no. dwellings and is under consideration by ADC. The site is not being marketed at this time.
- 5.2.3 As outlined, it was confirmed in January 2022 by appeal ref APP/C3810/W/21/3273087, that ADC currently have a Housing Land Supply of 2.63 years. This is a dramatic shortfall of homes. Even if Land West of Lidsey Road were to come forward in a reasonable timescale, its contribution by itself to meeting the very large shortfall of housing land supply currently found in ADC would be low. As such, there is a significant need for both this site and the application site.

5.3 Land at Bridge Cottage & The Old Cottage (18AL4)

- 5.3.1 The site is identified in the HELAA (Site Ref: 18AL4) as a developable. The site currently is within residential use. The HELAA Assessment Summary (Appendix A) advises possible constraints are a TPO within the site and potential for ground water flooding. The summary outlines that the site is unlikely to be deliverable in the next five years due to its remote location and the need for any scheme to be linked with the BEW masterplan, which will take time to resolve.
- 5.3.2 A planning application (ref: AL/75/19/PL) for 8 dwellings on the site was refused and subsequently dismissed at appeal on sustainability grounds due to its remote countryside location. It is therefore considered that the site is unsustainable and has very limited prospects of coming forward in the short or medium term. It therefore will be unable to meet ADC's

immediate need for additional housing, as such, the site has been discounted.

5.4 Land north of Lees Yard, Lidsey Road (WE8)

- 5.4.1 The site is identified in the HELAA (Site Ref: WE8) as a 'deliverable site'. The site is located adjacent to the settlement boundary of Aldingbourne. Redevelopment of the site will not meet the housing needs of individuals looking for accommodation in this settlement, or areas adjacent in Bognor Regis and Bersted in the same way as the application site.
- 5.4.2 The site is currently a horse paddock and comprises of a flat, square plot to the south of the settlement. The site is located next to A259 and bounded by trees.
- 5.4.3 Outline Planning permission for 38 dwellings on this site was approved 22 October 2020 (Ref: AL/21/20/OUT). It is our understanding that the site has been purchased by another developer and is no longer on the market, and as such the site is discounted on the grounds of being not available.

5.5 Wings Nursery, Lidsey Road (32)

- 5.5.1 The site is identified in the HELAA (Site Ref: 32) and is identified as a 'deliverable site'. The site is located adjacent to the settlement boundary of Aldingbourne.
- 5.5.2 The site consists of a relatively flat plot of grazing land and is screened by trees on three sides. There is an access road to the north which serves an adjoining site, however, access to the site is directly off Lidsey Road (A29).
- 5.5.3 Outline Planning Permission was granted on the 3rd October 2019 for 55 units (Ref: AL/32/19/OUT). This is now a housing commitment and would not contribute to addressing the shortfall of housing land in Arun District. It is also noted that an application by Southern Homes Ownership Ltd for the development of 71 dwellings on the site is currently under consideration (Ref: AL/20/21/PL). It is clear that the site has been purchased by another developer and is no longer on the market, and as such the site is discounted on the grounds of being not available.

5.6 Land to the rear of Stockhearn Nursery (19AL2)

- 5.6.1 The site is identified in the HELAA (Site Ref: 19AL2) as a 'developable site'. The site is located to the west of Lidsey Road and is surrounded by a number of sites that have been identified within the HELAA. The site sits outside of the settlement boundary. The site is greenfield, having previously been used as a plant nursery.
 - 5.6.2 The HELAA assessment summary table (see Appendix A) highlights that the site is not currently suitable as development would contravene policy C CP1 Countryside of the Arun Local Plan 2018. In terms of deliverability, the summary table outlines that the site is likely to be delivered in the longer term. In terms of constraints it is noted that the site is at risk to ground water flooding, has potential for archaeology and sits within the Lidsey Treatment catchment.
 - 5.6.3 The site does not benefit from planning permission and at this point, no planning applications have been submitted for the suggested total yield of 64 dwellings. It is also noted that the site
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was not promoted through the HELAA 2021 update. This raises doubt as to the sites availability for development.

- 5.6.4 Given the above, it is considered that the site is not currently available for development and that an application is not likely to come forward in a reasonable timescale in order to meet the urgent need for housing in the area. As such, the site has been discounted.

6. Conclusions of the Sequential Test

- 6.1 This report sets out the background, methodology, and findings of our assessment for the availability of other sites that may be sequentially preferable on flood risk grounds.
- 6.2 The sequential assessment has reviewed and relevant and necessary public data sources that have, and will, guide development opportunities in the area of scope confirmed by Arun District Council. Consideration has been given to a range of sites to examine if they are reasonably available and satisfy the assessment criteria detailed in Chapter 3 of this report.
- 6.3 Paragraph 033 (Ref. ID: 7-033-20140306) of the NPPF Planning Guidance advocates that when applying the Sequential Test to individual applications, a pragmatic approach on the availability of alternatives should be taken.
- 6.4 The report demonstrates that there are no other reasonably available alternative sites within the defined area of search confirmed by Arun District Council. For the above reasons the application site is considered to pass the sequential test.
- 6.5 Even the sites identified in combination, though they are not preferable, along with local plan site allocations, are not sufficient in terms of supply to meet the short term 5-year supply requirement set out by the Local Plan.

APPENDICES

APPENDIX A

HELAA Summary Report for Individually Assessed Sites

APPENDIX B

Land & Commercial Property - search results