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FLOOD RISK SEQUENTIAL ASSESSMENT

LAND WEST OF BROOK LANE AND SOUTH OF THE A259

STORE PROPERTY INVESTMENTS LIMITED

Date: May 2017

Ref: 12491

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- 1.1 This Flood Risk Assessment ('Assessment') has been prepared by Dalton Warner Davis LLP ('DWD') acting on behalf of Store Property Investments Ltd ('the applicant') in support of an application for outline planning permission on Land West of Brook Lane and South of A259.
- 1.2 The objective of planning policy for flood risk is to direct development away from areas at the highest risk of flooding. Secondly, where development is to be located in areas at risk of flooding it should be safe, not increase the risk of flooding elsewhere and where possible reduce the risk of flooding elsewhere.
- 1.3 The application has been supported by Flood Risk Assessment which has demonstrated that the development will not be at risk of flooding, nor will the proposal increase the risk of flooding elsewhere. It is important to stress that the majority of the site is located within Flood Risk Zone 1 (lowest risk of flooding). However, on the basis that a small proportion of the site is located in Flood Risk Zone 2 and 3 this statement seeks to evaluate the development of the site in sequential terms.
- 1.4 There are a number of important material considerations which justify the proposed development on this site and a flexible approach to flood risk policy should be applied. In particular the following should be material considerations in terms of suitability of this site over any other sites considered in the Sequential Assessment:
 - Only a small part of the proposal is within Flood Zone 3, the site has sought to direct built development to the parts of the site at lowest flood risk;
 - Mitigation measures are proposed which have been judged to be acceptable by statutory consultees as part of this application;
 - The proposal will not result in an increased flood risk off site.
- 1.5 A Flood Risk Assessment (FRA) has been prepared by CTP. As shown on Figure 4 on p.10 of the FRA, the vast majority of the application site is within Flood Risk Zone 1, at low risk of flooding. In the south eastern corner of the site there is a small area of land (approximately 0.6ha) located in Flood Zone 2 and a smaller parcel (approximately 0.2ha) within Flood Zone 3. As shown in the indicative layout, the existing and proposed buildings are located entirely within Flood Zone 1 and out of Flood Zones 2 and 3.
- 1.6 The FRA applies the sequential test. In accordance with Table 2 of the NPPF the proposed residential development and residential care home uses are considered as "More Vulnerable" and

with reference to Table 3, this type of construction is appropriate in Flood Zone 1 and 2 and the Exception Test is not required.

- 1.7 An initial assessment of the risk of flooding from the different possible key sources from the NPPF lists which could potentially affect the development site has been undertaken based on currently available information that shows the risk of flooding from all sources apart from the river and sea is initially assessed as low. The principle of development in this area is therefore acceptable.
- 1.8 Policy GEN9 requires that planning applications that will materially increase foul and/or surface water discharges will be refused unless that Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development. Policy GEN9 also requires that consideration is given to the use of SuDS as an alternative to conventional drainage. In terms of drainage, SuDS will be used to ensure that the development does not increase flood risk elsewhere as the storm water discharge rate will be limited to existing levels.
- 1.9 In summary the submitted assessment by CTP demonstrates that the proposed development is acceptable from a flood risk and drainage perspective. The drainage proposals for the site will need to be developed in line with the reserved matters submission in due course, however, the assessment undertaken to date provides sufficient evidence to demonstrate that it will be possible to deliver a housing and care home scheme on the site, without the proposal being at risk from flooding and without impact on the flood risk and drainage conditions off-site.
- 1.10 In accordance with the NPPF this statement establishes whether there are any reasonably available sites appropriate for the proposed development which could be considered sequentially preferable. A site should only be considered to be reasonably available if it is both 'deliverable' and 'developable' as defined by the NPPF (Para. 47 footnotes 11-12). A development proposal should therefore only fail to pass the Sequential Test if the alternative sites identified within the search area are at lower risk of flooding and would be appropriate for the proposed development and are 'reasonably available' for development.
- 1.11 It is often difficult to confirm the availability of a site, however the approach generally taken is that a site should only be considered reasonably available if all of the following apply:
- The site is within the agreed area of search;
 - The site is of a comparable size and can accommodate the requirements of the proposed development;

- The site is owned by the applicant or for sale at a fair market value; or
- The site is not safeguarded in the Local Plan for another use.

1.12 Sites should not be considered to be reasonably available if they fail to meet any of the above requirements or already have planning permission for a development that is likely to be implemented.

1.13 On the basis that the Arun Local Plan is currently at an advanced stage of progress, the supporting evidence basis is considered to be relatively up-to-date. This evidence base has been used as the basis for identifying potential residential development sites within the catchment area of Angmering, Littlehampton and Rustington that fall between a threshold of 3ha to 6 ha. The table below summarises these sites. Those sites that are identified in grey are identified as having a worse flood risk zoning on the EA flood risk map than the application site and therefore have been discounted.

1.14 In summary the following sites have been discounted:

- Sites which were less than 3 ha or more than 6 ha;
- Sites which are confirmed within the Council's evidence base to have no potential for development within the Plan period;
- Strategic Sites;
- Sites with planning permission or under construction;
- Sites within the 5 year housing supply and are therefore allocated for development.

1.15 The table below provides a summary of the remaining sites which were assessed in greater detail:

Ref	Site	Size (ha)	Allocation in Local Plan	Allocation in Emerging Plan	Identified Constraints	Flood Risk Zone	Commentary
RU8	The Vinery, Poling near Arundel	5.67	No Allocation	No Allocation	Potentially contaminated land, Arun SFRA ground water flood risk	Flood Zone 1	The site is currently in employment use and the Council's evidence base considers that the site would be appropriate for commercial intensification. Furthermore the available evidence base suggests that although located in Flood Risk Zone 1, the site is at risk of ground water flood risk. Given the need to retain the existing uses on the site, it would not be large enough to accommodate the proposed development.

111a	Phase 1 Land between East Drive and A259 Angmering and Rustington	5.6	Angmering and Rustington/East Preston Local Gap	Angmering and Rustington/East Preston Local Gap	Archaeological Notification Areas; Strategic Gaps; Arun SFRA Ground water flood risk v1; Settlement Gap	Flood Zone 1	As identified in the Council's Local Plan evidence base the development of the site for residential use would contravene a number Planning Policies and therefore would not be considered to be suitable. Furthermore the landscape appraisal indicates that the site is a key part of the open land that forms a landscape buffer between Angmering and the northern edge of Littlehampton and which maintains physical and partial visual separation between settlements. Having regard to importance of this site to the settlement gap we consider that this site is not suitable for the development proposed.
96	Land South of Water Lane	5	No Allocation	No Allocation	Flood zone 2, 3a & 3b at the north of this site	Majority Flood Zone 1, northern border flood zone 2, 3a, 3b	The site is in a flood risk zone which is at higher risk of flooding.
40	Land at Seven Acres and New Place Nursery	4.5 (3.18 developable)	No Allocation	No Allocation	Existing business on site would have to be relocated	Flood Zone 1	The site is not vacant and therefore the existing businesses on the site would need to be relocated. On this basis it is considered that the site is not available.
82	Land East of Dappers Lane	5.49 (3.29 developable)	No Allocation	No Allocation	Development of the site would require demolition of existing buildings. The site is located adjacent to flood zone 3b, groundwater emergence zone, and groundwater flood risk area.	Flood Zone 1	Although the site is within flood risk zone 1 the site is subject to flood risk constraints on the basis that the site is located adjacent to flood zone 3b, groundwater emergence zone and groundwater flood risk area. On the basis of this constraint, and the identification within the local plan that the site would be a long term aspiration for housing development it is considered that the site is not suitable or available for the development proposed.
101	Land South of Bramley Green/North of Mayflower Way (Shrublands Nursery)	5.25 (3.25 developable)	No Allocation	Strategic Housing Allocation - Angmering 2 (northern half) Gap Between Settlements	The demolition of the existing buildings. Given the sites previous use there is potential for contamination. The site is situated within a groundwater emergence zone and groundwater flood risk area.	Flood Zone 1	Although located within EA Flood Risk Zone 1 the Council's local plan evidence base suggests that the site is in a groundwater emergence zone and groundwater flood risk area. Notwithstanding this the site is not considered to be suitable or available for residential development of the scale proposed. Further constraints to development include multiple land ownerships, which along with the requirement to demolish existing buildings on site will be a constraint to delivery.

LH3	Lineside Industrial Estate, Littlehampton	9.89 (5.93 developable)	Largely unallocated. Small portion has employment allocation Site 5 (I) Policy 5	Within economic growth area	Large, level, regularly shaped site but with no opportunity for expansion due to adjoining uses. Opportunity for redevelopment or refurbishment of individual plots. Located within Flood Zone 1. Flood Zone Fluvial 2	70% in flood zone 3	Development of the site for the proposed uses would be contrary to the development plan and the site is within a high flood risk zone.
LH7	Riverside Industrial Estate, Littlehampton	5.48 (3.29 developable)	Existing employment site, eastern border part allocated in Local Plan - Site 8 new and existing port related commercial activities.	Within economic growth area	Medium size, level site constrained from expansion by adjacent users and river. Limited pockets of potential to redevelop. Within Flood Zone 3. Flood Zone Fluvial 3a.	Flood Zone 3	Development of the site for the proposed uses would be contrary to the development plan and the site is within a high flood risk zone.

1.16 Having regard to the policy requirements of the NPPF, the NPPG and guidance provided by the Environment Agency, we have undertaken a Sequential Assessment to demonstrate that there are no other more appropriate sites in terms of flood risk which are reasonably available for the proposed development. In summary this is a highly sustainable location, adjacent to a Settlement Boundary. The submitted application documents demonstrate that the proposal constitutes sustainable development and there are no other sites which are more suitable in terms of flood risk, even with flexibility applied.