

Sequential and Exception Test Addendum

The two planning applications for the relocation and redevelopment of Bognor Regis Golf Course were submitted with a Sequential and Exception Test. Site A, for the redevelopment of the golf course, was submitted to Arun District Council in December 2021 (LPA reference: FP/274/21/OUT).

In August 2022 the government updated the Flood Risk and Coastal Change national guidance. These updates included amendments to the sequential approach to locating development.

This Addendum note addresses the key guidance updates and demonstrates that the December 2021 Sequential and Exception Test outcomes remain valid. These updates are set out below.

Sources of flooding

The updated guidance requires Sequential Tests to review all sources of flooding, including ordinary watercourses, surface water as well as river and seas.

The December 2021 Test set out the Flood Zones for Site A using the Environment Agency maps. This identified the Site being located within Flood Zone 1, 2 and 3.

A summary of the assessment of risk of all sources of flooding to the site, which is assessed in greater detail in the Flood Risk Assessment and the updated Drainage Technical Note (December 2021) is provided below:

Item	Overview
Tidal Flood Risk	The Environment Agency have confirmed that the coastal defences have a 1 in 200 year Standard of Protection and that this will keep pace with the impacts of climate change. The risk of tidal flooding to the site is assessed to be Low.
Fluvial Flood Risk	Hydraulic modelling has been undertaken for the Lidsey Rife which flows past the western boundary of the development. The baseline results show that the extents of Flood Zone 3 are not as extensive as that shown by the Environment Agency's Flood Map for Planning. The post development modelling shows that the site can be safely developed without having adverse impacts elsewhere. Therefore, the risk of fluvial flooding is Low.
Surface Water Flood Risk	The Environment Agency's Flood Risk from Surface Water map demonstrates that the risk of surface water flooding to the proposed development is Low. Additionally the site specific hydraulic modelling confirms that the development platforms are not at risk of surface water flooding and surface water flows on to the site can be safely routed through the development. Therefore, the risk of surface water flooding is Low.
Groundwater Flood Risk	Baseline – High, the nearest borehole log records a water strike at 1.6mbgl in a perched aquifer. Post Development – Low, as mitigation measures will be included within the scheme design, these include a positive surface water drainage system and the

Item	Overview
	residential units will be constructed on a raised platform with FFL raised 300mm above the platform levels.
Sewer Flood Risk	The West Sussex, Lidey SWMP states that surface water and foul water sewer flooding has occurred at the golf course but no foul flooding has been reported to Southern Water Services due to hydraulic overload. This will however be mitigated by the drainage strategy and foul water strategy that will be implemented as part of the development.
Artificial Flood Risk	The site is located outside of the Environment Agency's modelled reservoir flood extents and no artificial waterbodies are identified that could pose a significant flood risk to the site. Therefore, the risk of reservoir flooding is Low.

Search area

The guidance now requires the Sequential Test to complete a district wide search, unless a smaller area can be justified.

As set out in the December 2021 Test at paragraph 1.5, Site A is the only suitable site for the proposed development as it enables the relocation of the golf course.

The requirement to undertake a District wide search is not appropriate for this scheme, as the only location the scheme could be located is on Site A.

The December 2021 Test did assess other sites, however a wider search away from the existing golf course would be unreasonable and would not allow these two sites to be closely interlinked into one overall project.

For these reasons it is not considered a wider search area needs to be undertaken.

Reasonably available sites

The December 2021 Test set out the site requirements when considering alternative sites. The main requirement of the site is to enable the relocation of the existing golf course.

However, other criteria were set out to understand whether additional sites should be assessed.

This reviewed a series of sites in Section 7 of the Test, demonstrating that these should all be discounted as part of the Test and did not identify any reasonable alternatives sites in an appropriate location, developable and free from site constraints and policy conflicts to deliver the overall project of the relocation and redevelopment of the golf course.

It is considered the updated guidance does not change this outcome of the Test, and the Sequential Test is passed.

Exception Test

Section 8 of the December 2021 Test presents the Exception Test. This is required due to the Sequential Test not identifying a more suitable site for the proposed development.

The updated guidance includes amendments to the climate change allowance. This is reflected in the updated drainage documentation submitted as part of the two planning applications.

Part 1 of the Exception Test remains valid as set out in paragraphs 8.6 and 8.7 presenting the sustainability benefits of the community. This demonstrates a substantial benefit of the proposed development to the local community.

Part 2 of the Exception Test requires the Flood Risk Assessment to demonstrate that development will be safe for its lifetime. The updated Drainage Technical Note demonstrates that through the inclusion of the updated climate change allowances the scheme remains safe for the lifetime of the development.

It is considered the Exception Test is still passed and outcomes remain the same.