

SEQUENTIAL ASSESSMENT

PROJECT: NEW BUILD PROJECT
LOCATION: WATERBURY HOUSE, FORD ROAD
CLIENT: CONSENSUS
OUTLINE BRIEF: DEVELOPMENT OF VACANT LAND
ADJACENT TO EXISTING FACILITY



SEQUENTIAL ASSESSMENT

Information contained within this document are to be read in conjunction with distributed drawings and information;

INTRODUCTION

This document has been produced in conjunction with the submitted information for the use in this planning application. The information contained within this document are relevant to a sequential assessment relating to the flood risk assessment and the proposed erection of 4no. residential bungalows (Class C3(b)), car parking and associated works.

For full details of the proposed development this document should be read in-conjunction with all the submitted documentation and not in isolation. In isolation this document simply focus's on addressing the sequential assessment to show that there are no preferable sites in relation to flood risk that this development can be located.

It is noted that from the Environment Agency online flood map and submitted flood risk assessment that the site is located within Flood Zone 3, but in an area that benefits from flood defences to protect again flooding from rivers.

SITE CONTEXT

The site is an existing care facility comprising of a mixture of flats and en-suite bedrooms run by the applicant. The built form consists of a three-storey building with additions including single storey and two-storey. The site benefits from a large car parking area to the front and large rear garden to the Side and rear of the property, with the gardens acting as communal space to the residents.

The proposed site identified by the red line boundary is an infrequently used and underutilised area of land to the side of the main functioning building and gardens.

The site is located to the North of Ford, but is identified as within designated open countryside. The site is bound by a railway line to the South, Commercial units to the West on the opposite side of Ford Road and a residential park home site to the North and East of the site. Within the site ownership the proposed will be sited to the South in close proximity to the existing built development.

Access to the site is well provided with the main accesses off Ford Road and within a few metres of Ford train station. A public house, 'The Ship and Anchor' is within walking distance of the site to the south.

The settlement Ford which the site sits just to the North is noted for outdoor recreation, places of worship, cafés and markets. The site is well located with access to other settlements such as Yapton, Climping and Littlehampton.

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The proposed development will be adjacent to and within the ownership boundary of the applicant to a Grade II listed building noted as 'The Arundel Arms Public House at Ford Station (listing entry 1222219). A Heritage impact assessment is included within the application package.

The proposed development is located within Flood Risk Zone 3 and is therefore at risk of flooding whilst also within a flood defence area. This document 'a sequential test' and a separate flood risk assessment are therefore being provided to accompany the submission.

PROPOSED DEVELOPMENT

The proposed development and subject of this application comprises the erection of 4no. supported living units (Class C3(b)). Whilst operating as a different type of living support the new build will operate under the support of the existing care facility allowing for a reduction in ancillary and staff support spaces associated with a unit of this type. The facility would therefore require less staff and a smaller footprint having a reduced impact on the flood zone and making the development more cost effective to provide the support needs of the area.

Whilst a supported living unit; the purpose of the proposed is to provide a more 'independent' style of supported living promoting a return to the community whilst still retaining the care and support needed when required to the resident. These types of unit are seen as the final step back into the community with residents carefully selected and assessed prior to their relocation to this type of property. Whilst 'independent' the staffing support will still provide on-site assistance in the event of an emergency, such as fire or flooding with 24/7 monitoring throughout the year.

This scheme is to provide homes and support to more vulnerable members of the local community, providing them with independence and the protection of their well-being. The justification of its proposed location is that it will run hand-in-hand with the existing facility; it will have a minimal operational and physical footprint given its ties to the existing facilities on the site; it has been identified as a requirement for the local community to meet the needs of local vulnerable residents currently in unsuitable or further afield locations away from their families and communities.

The proposed development is a single storey 'bungalow' style development with a view to being subservient to the main building mass on the property. Each unit will comprise a bedroom, bathroom, kitchen and living space; along with private amenity space.

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FLOOD RISK

As noted above and detailed within the flood risk assessment the proposed is located within Flood Zone 3 (Figure 1) with a high probability of flooding from local rivers. However, due to flood defence systems the area is actually at low risk from flooding from the rivers or sea (Figure 2); meaning the site, site access and roadway to the site frontage has a 0.1% to 1% chance of flooding each year.

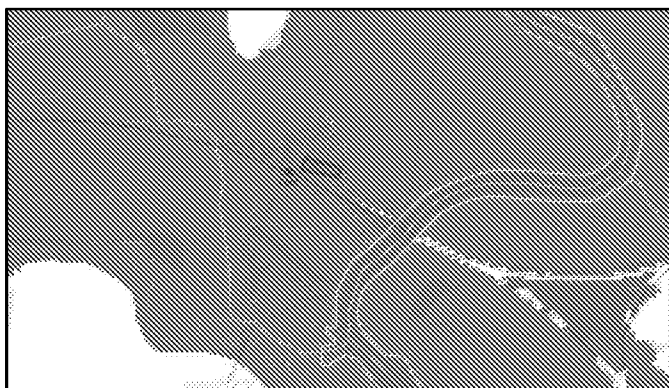


Figure 1: Environment Agency Flood Map



Figure 2: Risk of flooding from rivers or the sea

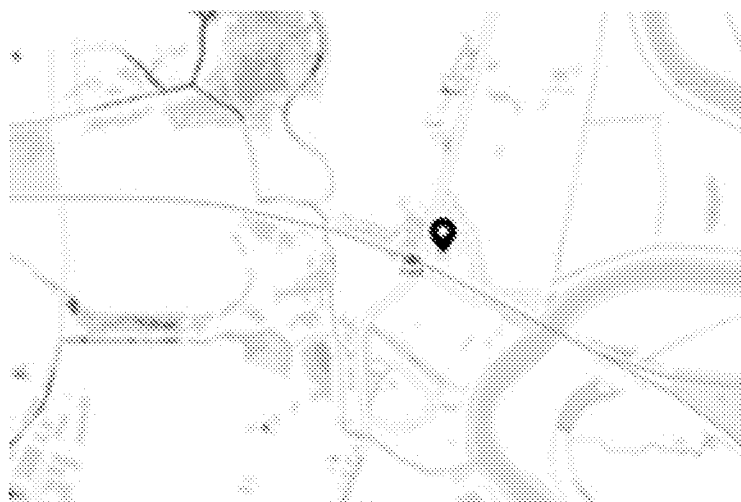


Figure 3: Environment Agency Map of risk from surface water flooding

In relation to surface water flooding, the environment agency data indicates that the site is 'Very Low Risk' from flooding (Figure 3).

The Environment Agency data suggests that the risk from surface water flooding is less than 0.1%.

Along with this the EA data suggests that the site is at low risk from flooding from groundwater and reservoirs.

All the above would suggest that the site is deemed low risk and acceptable in relation to flooding.

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PLANNING POLICY

On assessment of the application in relation to National Planning Policy this document and accompanying information is assessed on the more recent NPPF released December 2024. The framework sets out the Governments planning policies for England and how these should be applied. Specifically under Chapter 14. Meeting the challenge of climate change, flooding and coastal change paragraphs 170-182 generally outline the impact of flooding on developments.

Paragraph 170 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). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 172 States:

All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

Paragraph 174 States:

Within this context 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.

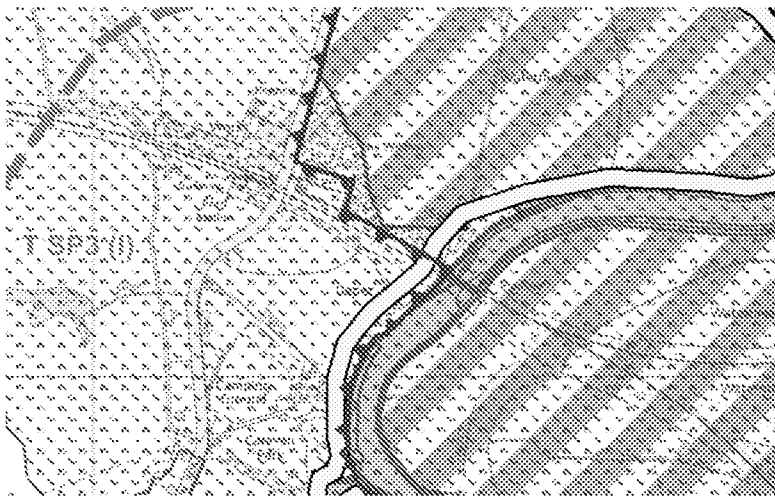
Given the above assessment that the site area is within a low risk area (although identified within flood zone 3) it is assumed that an exception test would not be required on the basis of the sequential test.

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ARUN LOCAL PLAN



On review of the latest Arun local plan the site is outside of the setting of Arundel but is within the Biodiversity Opportunity Area (BOA)

Figure 4: Extract of Arun Local Plan Map

SEQUENTIAL ASSESSMENT

The sequential test should be applied for this development due to its location against reasonably available sites considered within an appropriate graphic area. The aim of the sequential test is to steer new development to areas at lower risk of flooding. From initial discussions between the council and the applicants representatives it is understood that rather than a district wide assessment it is accepted for this proposal that it be restricted to the parishes of Ford, Arundel and Climping.



Figure 5: Arundel Parish

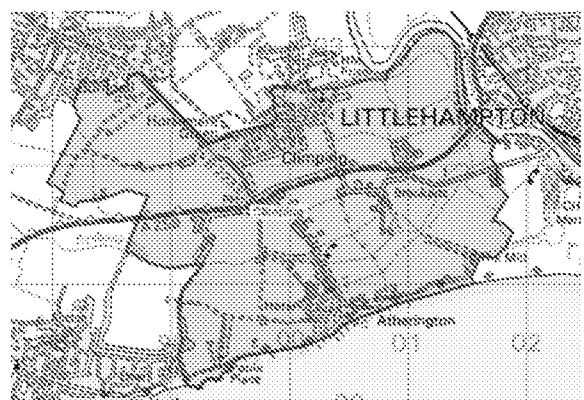


Figure 6: Climping Parish

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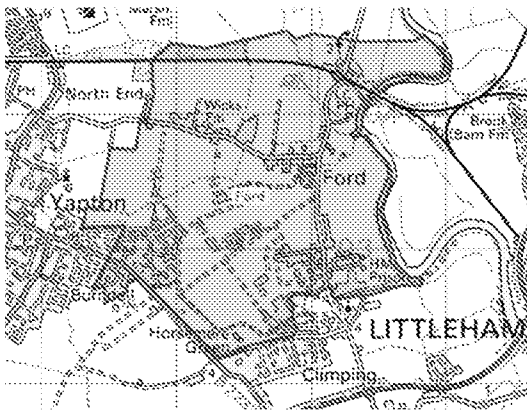


Figure 7: Ford Parish

A departure from the 'district wide' approach has been seen as acceptable given the nature and scale of the proposed.

The scale of the development to be considered should be plus or minus 10% of that required for the scheme and in that respect should be limited to between 0.1ha and 0.3ha. Sites outside of these areas should therefore be discounted.

The assessment is focused on potentially suitable sites allocated for development within the local plan, as sites within the Strategic Housing and Employment Land Availability

Assessment (SHELAA) and any generally marketed sites / land currently available.

Flood Risk- it is noted from a review of the Arun Strategic Flood Risk Assessment that large swathes of the Eastern side the Parish of Climping are located within flood zones 3a and 3b (figure 8). In addition to this large parts of the Parish of Arundel is also within Flood Zones 3a and 3b (figure 9). Also in the same instance the Parish of Ford also has large areas within Flood zones 3a and 3b.

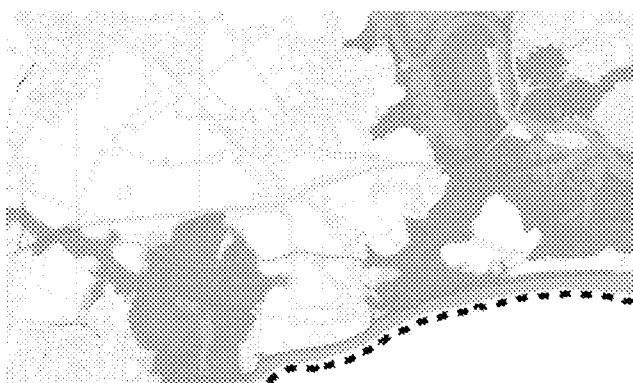


Figure 8: Parish of Climping

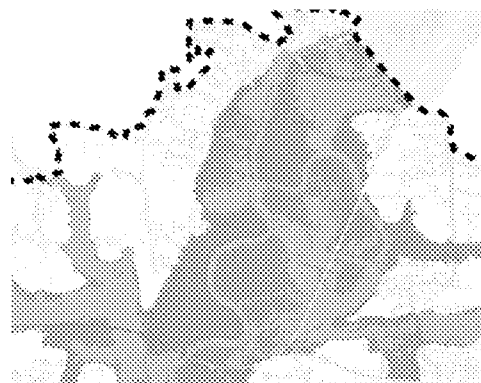


Figure 9: Parish of Arundel

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Figure 10: Parish of Ford

As these areas are of the same flood risk level they have therefore been removed from this assessment as they are not sequentially preferable to the application site.

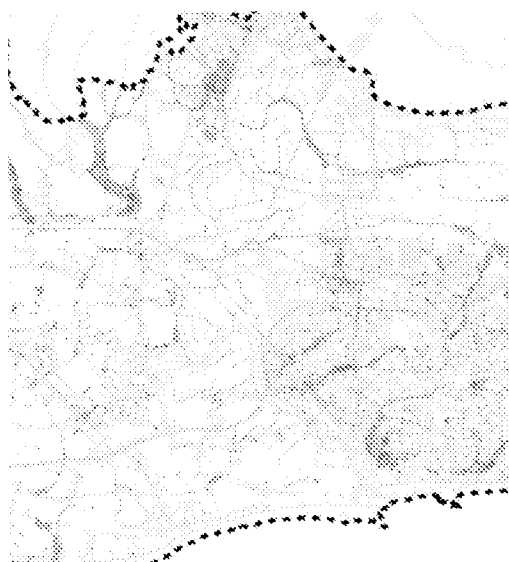
From review of the flood risk assessment and SFRA taking into account climate change, it is noted that the majority of the search area will be unaffected with only small pockets of space becoming part of Flood Zone 3a. These areas have also therefore been removed.

With regards to surface water flood risk as identified the application site is not located in an area of risk from flooding. We have noted however, that within the SFRA that there are locations within the

search area which are at risk, these facts have once again been taken into account when undertaking the site search assessment.(Figure 11).

Figure 11: Surface water flood risk map of the Parishes of Ford, Arundel and Climping.

Figure 12: Groundwater Flood Risk
Parishes of Ford, Arundel and Climping



As noted in the SFRA map extract (figure 12) large areas of the search area are at the same level of risk as the application site. This has also been a factor of this sequential test.

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On further investigation to the historic flood map data included within the SFRA which shows previous flood incidents by type it is noted that within the Parish of Climping there are numerous examples of historic surface water flooding; there are also examples of fluvial and tidal flooding events within other parts of the search area; which in our view is material to the assessment of this application and justification to discount these areas. It is noted that there have been no historic flood events at the application site, which would support this location.

Figure 13: Historic Flood Events within the Parishes of Ford, Arundel and Climping.

Review of Allocated Sites

On review of the Adopted policy maps for Allocated Sites it is noted that large areas to the East of Climping, Ford and Arundel Parishes are designated as Green Gap and these areas are not therefore likely to be found suitable for development. There are also two large strategic housing allocations in Climping, including Ford Aerodrome and land off Horsemere Green Lane.

Within the Parish of Arundel there are a number of smaller allocated housing sites, it is also understood that works are to commence on the larger strategic sites meaning they will be unavailable.

In relation to the smaller sites within Arundel; the two located to the South east of the town centre are located on previously developed sites, and will therefore not be viable or suitable for the use proposed given the costs associated with preparing the site for development. Also the allocated housing sites off Ford Road are now understood to be under construction and are also therefore not available. Finally, all the proposed allocated sites within Arundel are understood to be in an area of equal or worse flood risk than the proposed site.

Following review of Green Gap and housing allocation sites there are further noted open space allocations, a biodiversity opportunity area and a strategic waste site. It is seen that in relation to the

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proposed site all of these areas would not be seen as a more preferred location to the proposed. Whilst the application site is noted as within the BOA it should be noted that the site is already in use as a care facility, and therefore not comparable to other undeveloped sites within these areas.

In conclusion of the assessment of allocated sites we are therefore not aware of any sequentially preferable allocated sites for the proposed.

Strategic Housing and Employment Land Availability Assessment (SHELAA)

Within the published documents there were only two identifiable sites deemed to be deliverable within the three Parishes are areas subject to this assessment.

-Reference: 18F2 Land to the South of Ford Lane and east of King George V rec Yapton. The site is noted to have a capacity of 294 units.

-Reference: 71 Land at former Ford Airfield, Ford. The site is noted to have a capacity of 1,500.

It is seen that both these sites are clearly too large and would be unsuitable for segregation to the scale required in relation to the subject application development.

It should be considered that the proposed development is for the erection of four self-contained supported living units, class of use C3(b) on the site of an existing care facility. Whilst the proposed is a new development; it is in essences the same principle use of the existing facility providing care and support for more vulnerable members of the community in an area in need of this type of facility. Therefore to locate the proposed away from this site would present operational issues for the facility. It is therefore seen that these two large sites would not be deemed suitable as there currently isn't the facilities / amenities for staff and the service support as currently located within the Waterbury House grounds.

Within the SHELAA it confirms that there are a total of 2 developable sites within the three Parishes. These sites are;

-Reference: 20AB13 Arundel Police Station, The Causeway with availability for 7 units.

-Reference: F01A Land to the North of Horsemere Green Lane, Climping with availability for 21 residential units.

These two sites are again deemed too large to meet the needs of the proposed under consideration, and are therefore not seen as sequentially preferable to the Waterbury House site.

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The SHELAA report also contains details of sites not proposed to be taken forward many of which have not been taken forward due to flood risk associated which would be equivalent or higher than the proposed so are therefore not seen as sequentially preferable.

On review of allocated and developable sites there appear to be none that are available, deliverable or in a lower risk from flooding than the Waterbury House site.

Neighbourhood Plan Sites

The strategic Housing and Employment Land Availability Assessment draws attention to a number of developable neighbourhood plan sites; including areas within the subject search area; most of which are within an area of flood risk equal to or higher than the subject site.

- *Policy AR2 – Land off Ford Road, Arundel*
The site is noted as 8.9ha in area, of which 3.9ha is deemed developable for up to 90 residential units, and D1/D2 community use.
This site is seen as too large to meet the needs of the proposed, and unsuitable for segregation for such as small development.
- *Policy AR3 – Land at Fitzalan Road*
The site is noted as 0.36ha in area, which is slightly larger than the search criteria and is deemed developable for up to 24 residential units, with a clear focus on first time buyers. This would be considered an very different user group to the current and proposed use of the Waterbury site. Within this site there are also identified a mixture of industrial and commercial units none of which would be seen as suitable for conversion to the proposed use. With the cost of demolition and redevelopment seen as significant compared to the proposed. It is also noted that this site is also located in close proximity to the river and therefore seen as at greater risk of flooding than the subject site.
- *Policy AR4 – The Police station, The Causeway*
The site is noted as 1.0ha in area, and reserved for redevelopment for residential use of roughly 12 units. Again this site is identified with a focus on first time buyers. Considerations of this site are the same as AR3.
- *Policy AR5 – Swallow Brewery, Fitzalan Road*
This allocation is identified as a non-designated heritage asset. The policy further states that this site should focus on the retention of the existing building. The site would therefore not be suitable for the delivery of a supported housing development, with cost and redevelopment of a non-designated heritage property seen as unviable. Therefore not sequentially preferable to the subject site.

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We are therefore not aware of any sequentially preferable allocated neighbourhood plan areas than the subject site.

Additional Sites

In addition to the adopted local plan and SHELAA documents a desktop study of the local area was undertaken by the applicant for any general marketed sites and land. This proved to be unsuccessful with no suitable or available sites identified.

It is therefore seen that there based on the above assessment that there are no more sequentially preferable sites for the delivery of the proposed development, and no sites more suitable for the delivery of a supported living development adjacent to and in conjunction with an existing care facility.

Conclusion

This assessment has evaluated the proposed delivery of a C3(b) care facility against the requirements of the sequential test.

The site is located in a Flood Zone 3 and is therefore required to submit a sequential test.

Given the nature of the proposed it is deemed to be more vulnerable, but that the site is located within an area which is deemed suitable for the use by way of its current use as a matter of principle, the scope of the sequential test was agreed to be limited to the Parishes of Ford, Arundel and Climping rather than a 'district wide' approach.

Within this statement regarding sequential testing of alternative sites it clearly demonstrates that there are no suitable alternative sites available, deliverable or could appropriately accommodate the proposed in a lower risk area for flooding.

Given the site has an existing care facility with the proposed operating dependent to the existing and as a result of the flood risk assessment and sequential review, it is clear that the proposed development would be as safe as the existing development on the site in relation to flood risk, taking account that the vulnerability of its users will be under 24/7 supervision by shifted staff (not live in), and without increasing flood risk elsewhere.

It should be seen that in line with national guidance and the flood risk assessment submitted with this application that the scheme should be considered acceptable in terms of flood risk.