

Lewes Neighbourhood Plan Sequential Test Report

May 2018



Prepared by Feria Urbanism
on behalf of Lewes Town Council
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Introduction

This report has been prepared by Feria Urbanism in association with ClearLead Consulting Ltd. It provides the evidence base to demonstrate that the Sequential Test methodology has been applied in accordance with the requirements of the National Planning Policy Framework (NPPF) in allocating development sites within the Lewes Neighbourhood Area. It firstly sets out the background to the study, then applies the Sequential Test methodology to the allocation sites. This has involved screening sites to establish their level of flood risk. For any sites screened in, consideration has been given to whether the development can be accommodated on sites with a lower flood risk and if not, the Exception Test has then been applied. The application of the Sequential Test and Exception Test has been informed by the SDNPA's combined Level 1 Update and Level 2 SFRA 2017¹, the Lewes Neighbourhood Plan Site Assessment Report (Selected and Not Selected Sites) and the Sustainability Appraisal Report which accompanies the Lewes Neighbourhood Plan. This document accompanies the Submission version of the Lewes Neighbourhood Plan (May 2018).

Local Planning Context

The Lewes Neighbourhood Area lies fully within the South Downs National Park. The Lewes Neighbourhood Plan conforms with the Local Plan published by the South Downs National Park Authority, which is founded on the National Parks' primary

¹ South Downs National Park Authority (September 2017) Level 1 Update and Level 2 Strategic Flood Risk Assessment prepared by Amec Foster Wheeler

purpose: “to conserve and enhance the natural beauty, wildlife and cultural heritage of the area”.

The Local Plan also has regard to National Parks’ duty “to seek to foster the economic and social well-being of the local communities within the National Park”. The Lewes Neighbourhood Plan conforms with the Local Plan’s spatial strategy of a medium level of growth dispersed across the towns and villages. This reflects the historic delivery rate of new homes within the National Park area.

This dispersed approach is supported by the Sustainability Appraisal (SA) of the Local Plan as it would do the most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, while protecting and enhancing the special qualities of the National Park. The spatial strategy also reflects the outcome of public consultation and strong community support for addressing local housing need within many settlements across the National Park.

Methodology

The Sequential Test is applied during preparation of a plan to steer the allocation of development sites towards areas of lowest flood risk i.e. Flood Zone 1. Flood Zone definitions are set out in the National Planning Policy Guidance²: These Flood Zones refer to the probability of river and sea flooding, ignoring the presence of defences. They are shown on the Environment Agency’s Flood Map for Planning (Rivers and Sea)³, available on the Environment Agency’s website, as indicated in the table below.

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as ‘clear’ on the Flood Map – all land outside Zones 2 and 3)
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

The Flood Zones shown on the Environment Agency’s Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference therefore also needs to be made to the Strategic Flood Risk Assessment (SFRA) when considering location and

² <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

³ <https://flood-map-for-planning.service.gov.uk/> accessed on 23/05/18

potential future flood risks to developments and land uses. The SFRA document relevant to the Lewes Neighbourhood Plan is the Level 1 Update and Level 2 SFRA 2017⁴.

The methodology used in this report conforms to the approach in the NPPF PGG, as set out in Diagram 2 of the NPPF PGG⁵, which is reproduced below:

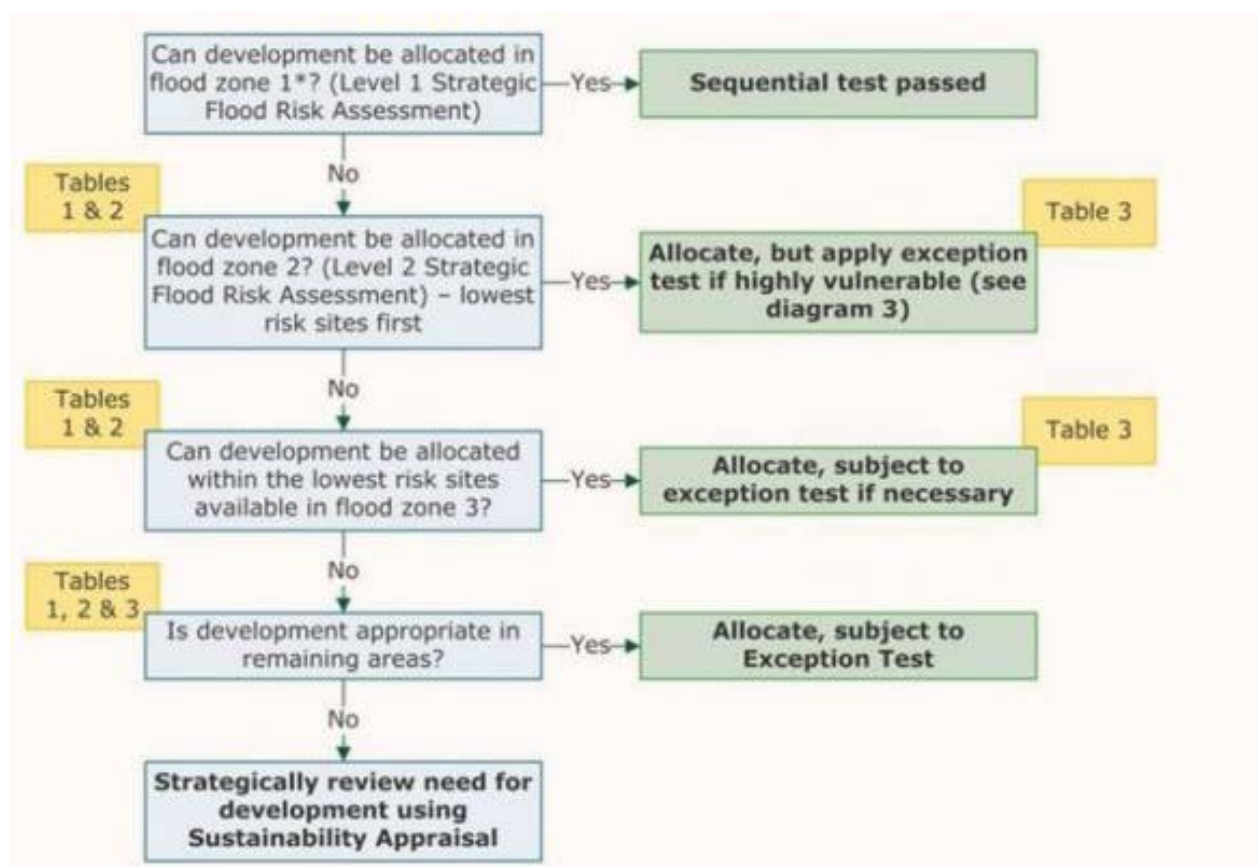


Figure 1 – Application of the Sequential Test. Reference to Tables 1, 2, and 3 in this figure refers to tables in the NPPF PPG⁶ which provide definitions of Flood Zones, Development

⁴ South Downs National Park Authority (September 2017) Level 1 Update and Level 2 Strategic Flood Risk Assessment prepared by Amec Foster Wheeler

⁵ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

⁶ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Vulnerability and the Flood Risk Vulnerability and Flood Zone Compatibility matrix respectively.

Buildings used for dwelling houses are classified as ‘More Vulnerable’ to flooding. The mixed-use allocations will also fall into the ‘More Vulnerable’ class even though office space, and similar non-residential developments alone are classified as ‘Less Vulnerable’. Table 3 of the NPPF PPG⁷ guidance combines the information in Tables 1 and 2 of the guidance to provide flood risk vulnerability and flood zone ‘compatibility’ matrix as shown below.

Table 2: Flood Risk Vulnerability and Flood Zone ‘Compatibility’ ⁸			
Flood Zones	High Vulnerable Development (Gypsy and Traveller Sites)	More Vulnerable (Residential, Mixed Use)	Less Vulnerable (Commercial)
1 – Land having a less than 1 in 1,000 AEP of river or sea flooding	✓	✓	✓
2 – Land having between a 1 in 100 and 1 in 1,000 AEP of river flooding; or land having between a 1 in 200 and 1 in 1,000 AEP of sea flooding	Exception test required	✓	✓
3a – Land having a 1 in 100 or greater AEP of river flooding; or land having a 1 in 200 or greater AEP of sea flooding	*	Exception test required	✓
3b – This zone comprises land where water must flow or be stored in times of flood. For the purposes of this report,			

⁷ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf

and where appropriate modelling outputs are available, it has been defined as land having a less than or equal to 1 in 20 AEP risk of river or sea flooding	✘	✘	✘
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Note: Where ✓ indicates development is appropriate and ✘ indicates development is inappropriate. The full table is provided in the NPPF PGG.

A simple ‘colour-coding’ assessment methodology has been employed, as presented in Table 3 below, to screen the allocation sites and ascertain the likelihood of flooding. In this respect, the likelihood of flooding for sites categorised as green is unlikely/low, therefore these sites passed the Sequential Test and were ‘screened out’ from further assessment. Sites categorised with a likely (red) likelihood of flooding, were ‘screened in’ to undergo further assessment (in accordance with Figure 1 above).

Table 3 – Screening Criteria	
Passes Sequential Test and screened out from further assessment	Development sites located wholly within Flood Zone 1
Does not pass Sequential Test and is screened in for further assessment	Development sites located within Flood Zones 2 or 3

Where sites are ‘screened in’ they have been further considered and the following two questions posed:

- Can the development be relocated to alternative locations with a lower risk of flooding?

- Can the more sensitive development proposed be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?

These steps are undertaken to direct development to sites or areas at least risk of flooding. The steps are presented within 'Site Profiles' for all 'screened in' sites within Annex 1.

Climate Change

Sea level rise is predicted to increase by approximately 1m within the next 100 years⁹. Therefore, it is necessary to analyse whether the flood risk to the selected allocation sites would change with climate change.

In the absence of up to date climate change modelling for those sites that are at risk of fluvial or tidal flooding, the Environment Agency has advised that a 15m buffer is placed around Flood Zone 2 to assess the more severe impacts of climate change on fluvial flood risk. This will provide some indication of the additional area where development might become constrained for flood reasons in the future. It is recognised however, that this approach is somewhat simplistic in that it does not account for local topographical or hydraulic circumstances. The 2017 SFRA report¹⁰ where relevant, identifies where these topographical or hydraulic features would need to be factored in and these have been considered in the Sequential Test (see Table 4 and the Site Profiles within Annex 2).

⁹ Flood Risk Assessments: Climate Change Allowances, Environment Agency, February 2017

¹⁰ South Downs National Park Authority (September 2017) Level 1 Update and Level 2 Strategic Flood Risk Assessment prepared by Amec Foster Wheeler

The Site Identification Process

The proposed housing requirements for Lewes as expressed in the Lewes Joint Core Strategy and the emerging South Downs Local Plan is as follows:

- 835 new homes to be provided over the plan period of 2015 to 2033;
- Of these new homes, 415 will be at North Street (Spatial Policy 3) once flood protection has been implemented;
- Another 220-240 new homes will be at Old Malling Farm (Spatial Policy 4); and
- A balance of 220 (+10%) new homes to be planned through the Lewes Neighbourhood Plan.

In 2016, work was undertaken by the Lewes Neighbourhood Plan Steering Group (LNPSG) to identify land for housing that could successfully be allocated in the Neighbourhood Plan to meet the 220 (+10%) homes to be provided in Lewes through the Lewes Neighbourhood Plan. The area of search was based on the Lewes Neighbourhood Plan Boundary, which is shown in Figure 2.

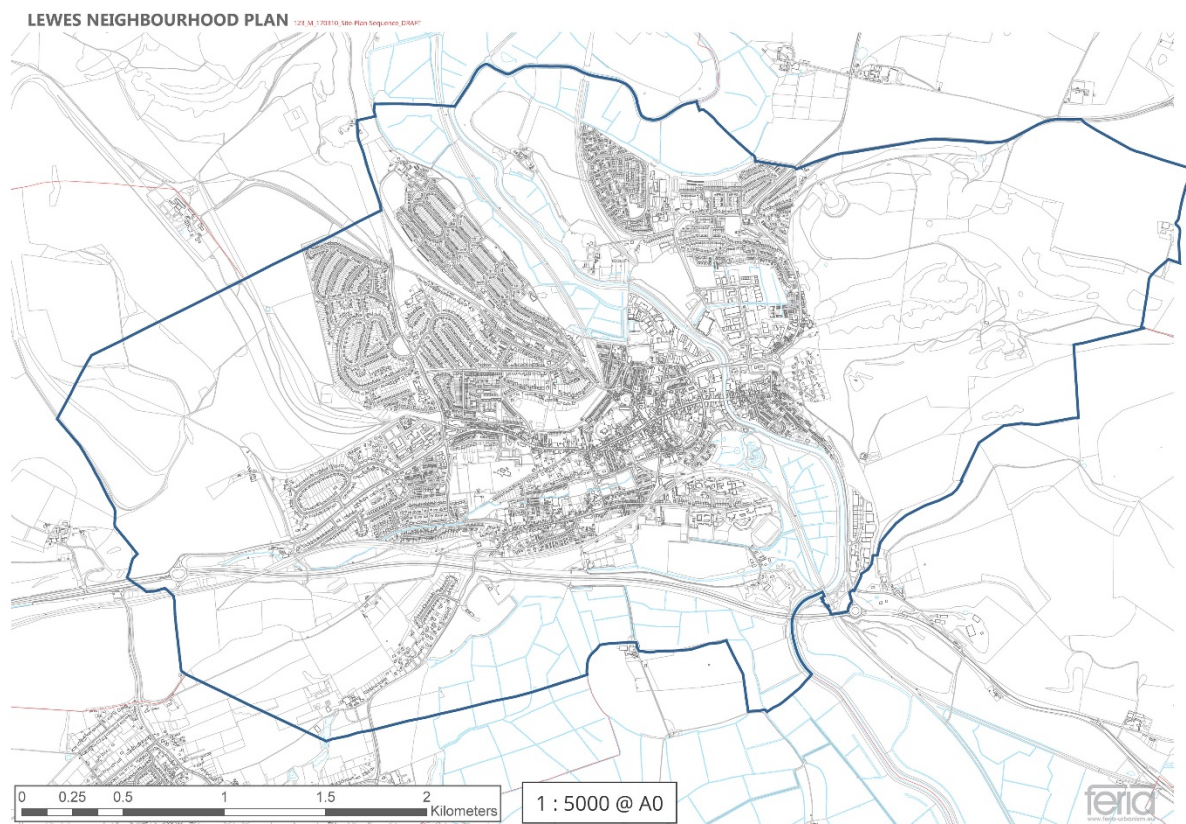


Figure 2 Lewes Neighbourhood Plan Boundary

Note, this boundary is also the Lewes Town Council boundary

In September 2015, Lewes Town Council ran a “calls for sites” process that identified a small number of potential allocation sites. In addition, Lewes Town Council also approached local authorities with potential development land within the Lewes settlement boundary such as Lewes District Council, East Sussex County Council and the Police Authority, etc.

Sites were also identified using the SDNPA Strategic Housing Land Availability Assessment (SHLAA) 2016 which covered the entire SDNPA planning area. The capacity for individual settlements to accommodate new housing informed the approach taken to the SHLAA. Given the National Park's primary purpose "to conserve and enhance the natural beauty, wildlife and cultural heritage of the area", the first stage of the assessment was to consider the landscape sensitivity of a potential site. As well as this, several other factors or constraints were considered, including flood risk, in assessing the suitability of a site for housing development.

A complete list of reasonable potential allocation sites was created in March 2017. This list is provided in Annex 1. The full list of sites was subject to Sustainability Appraisal (SA) between March and April 2017. The potential sustainability effects of all the sites, both negative and positive, have been recorded within the SA Report. The SA, as well as public consultation, informed decisions on which sites to select as allocations.

The list of sites in Annex 1 provides information about the Flood Zones that the sites fall within. The Annex also identifies which sites have been selected as allocations and provides reasons why some sites have not been selected as allocations. This includes the sites being too small to be considered as allocations and sites being located outside of the Lewes settlement boundary.

The sites selected as allocations are all brownfield sites, all lie within the Lewes settlement boundary¹¹ and all are available for development over the plan period. The sites selected are those which the Lewes Neighbourhood Plan Steering group consider

¹¹ See Lewes Town Council Neighbourhood Plan 2015 – 2033 Submission Plan May 2018, p20-21

best meet the objectives of the Neighbourhood Plan and will result in the optimum sustainability benefits to the town and community.

Results

With reference to the criteria set out within Table 3, the following table presents the results of screening to identify sites which pass the Sequential Test and those which require further consideration. Table 4 lists all the Lewes Neighbourhood Plan allocation sites.

It should be noted that the following sites have passed the Sequential Test; they are located within Flood Zone 1 but the Level 2 SFRA¹² identifies that they may have an access which is at risk from flooding:

- PL1 (2) Land at Astley House & Police Garage;
- PL1 (21) Land at Kingsley Road Garage Site;
- PL1 (34) Land at Little East Street Car Park, Corner of North Street & East Street;
- PL1 (44) Land at Princes Charles Road Garage Site;
- PL1 (46) Land at Queens Road Garage Site; and
- PL1 (52) Land at St Anne's Crescent.

These sites will require site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development.

¹² South Downs National Park Authority (September 2017) Level 1 Update and Level 2 Strategic Flood Risk Assessment prepared by Amec Foster Wheeler

Table 4: Results of the Sequential Test Screening

Policy Code	Site Name	Number of Units	Flood Risk Zone Currently	Screened into or out of further consideration?
PL1 (2)	Land at Astley House & Police Garage	25	FZ 1	Out (Passes Sequential Test)
PL1 (3)	Land at the Auction Rooms	11	FZ2 and 3	In
PL1 (4)	Land at Blois Road, Garage Site North	6	FZ 1	Out (Passes Sequential Test)
PL1 (5)	Land at Blois Road, Garage Site South	6	FZ 1	Out (Passes Sequential Test)
PL1 (8)	Land at Buckwell Court, Garage Site	6	FZ1 but within 50m distance of Flood Zone 2 and 3 of the River Ouse. Site could be within a few metres elevation from FZ2 and 3 and therefore screened in to take account of climate change.	In
PL1 (21)	Land at Kingsley Road Garage Site	6	FZ1	Out (Passes Sequential Test)
PL1 (26)	Land at South Downs Road	101	FZ2 and 3	In
PL1 (34)	Land at Little East Street Car Park, Corner of North Street & East Street	11	FZ1	Out (Passes Sequential Test)
PL1 (35)	Land at The Lynchets Garage Site	6	FZ1	Out (Passes Sequential Test)
PL1 (36)	Land at Magistrates Court Car Park, Court Road	9	FZ2 and 3	In
PL1 (39)	Land at Former Petrol Filling Station, Malling Street	5	FZ2 and 3	In
PL1 (44)	Land at Princes Charles Road Garage Site	6	FZ1	Out (Passes Sequential Test)
PL1 (46)	Land at Queens Road Garage Site	6	FZ1	Out (Passes Sequential Test)
PL1 (48)	Land at Former Ambulance Headquarters, Friars Walk	24	FZ2 and 3	In
PL1 (52)	Land at St Anne's Crescent	12	FZ1	Out (Passes Sequential Test)
PL1 (53)	Former St Anne's School Site	35	FZ1. Within 50m distance of Flood Zone 2, but land rises 10m steeply away from floodplain,	Out (Passes Sequential Test)

Table 4: Results of the Sequential Test Screening				
Policy Code	Site Name	Number of Units	Flood Risk Zone Currently	Screened into or out of further consideration?
			therefore well above 1m in next 100 years sea level rise predicted with climate change.	
PL1 (57)	Lewes Railway Station Car Park	20	FZ2 and 3	In
TOTAL		295		

Ten sites are considered to be at low risk of fluvial or tidal flooding (see green colour-coding in Figure 4) and therefore pass the Sequential Test.

In total, seven out of the 17 allocated sites in the Lewes Neighbourhood Plan are considered to be at risk of fluvial or tidal flooding because all or part of the site is located within Flood Zones 2 or 3 (including as a result of climate change) and do not pass the Sequential Test. These sites are therefore subject to further consideration and are:

- PL1 (3), Land at the Auction Rooms;
- PL1 (8), Land at Buckwell Court, Garage Site;
- PL1 (26), Land at Southdowns Road;
- PL1 (36), Land at Magistrates Court Car Park, Court Road;
- PL1 (39), Land at Former Petrol Filling Station, Malling Street;
- PL1 (48), Land at Former Ambulance Headquarters, Friars Walk; and
- PL1 (57), Lewes Railway Station Car Park.

For these seven sites, further analysis was required in terms of:

- Could the proposed site allocation be alternatively located in a site wholly within Flood Zone 1?
- Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?

A Site Profile is presented in Annex 2 for each of the seven sites which require further consideration and maps showing the extent of flood risk are presented in Annex 3.

Table 5 below sets out the alternative available sites which fall within Flood Zone 1 but were not selected as allocations. These sites were not selected because they are not considered to meet the objectives of the Neighbourhood Plan as well as the selected sites and in some cases could result in potential significant negative effects as identified within the SA relating to landscape character, heritage assets, accessibility, air quality, tranquillity and light pollution.

Table 6 sets out one alternative available site which falls within Flood Zone 2 but was also not selected. Both Tables 5 and 6 demonstrate that there are no alternative sites considered to be available within the neighbourhood Plan Area.

Table 5: Alternative Sites Which fall within Flood Zone 1

Ref	Name	Number of dwellings	Flood Risk Zone	Reason that the site does not meet NP objectives	Potential significant negative effects identified in SA
01	Antiques Centre	6	FZI	Redevelopment would lead to the loss of the Antiques Centre which has both tourism and retail benefits and would therefore work against the achievement of NP objective 8 supporting tourism and objective 1 Sustainable Communities which aims to ensure that the NP contributes to the creation of safe, sustainable and mixed communities that can progress into the future with good access to local jobs.	<ul style="list-style-type: none"> • Site is located within Air Quality Management Area (AQMA) and there is a risk of increasing car use by introducing new residents to this area, a significant negative effect has been identified. • Site is located within an archaeological notification area and conservation area. Due to sensitivity and importance of these areas, development is likely to have a high magnitude and a significant negative effect.
18	Houndean Farm	20	FZI	This site has poor access to facilities and transport links; it lies outside the main settlement boundary and is therefore not considered a reasonable alternative. Development could involve the use of greenfield land which would work against the achievement of NP objective 4 Efficient Use of Land. It is also contrary to NP Policy PL1 General Housing Strategy which precludes development of greenfield sites outside of the settlement boundary. The site would also not support NP objective 6 Easily Moving Around.	<ul style="list-style-type: none"> • Site is in a remote location, far from local facilities and services. • Located within landscape a character area which is considered to have a high landscape value. • Site is likely to contribute to light pollution and effect overall tranquillity. • Development is likely to result in further reliance upon private vehicles due to its isolated location.

Table 5: Alternative Sites Which fall within Flood Zone 1

Ref	Name	Number of dwellings	Flood Risk Zone	Reason that the site does not meet NP objectives	Potential significant negative effects identified in SA
27	Houndean Rise	28	FZI	<p>Development could involve the use of greenfield land which would work against the achievement of NP objective 4 Efficient Use of Land. It is also contrary to NP Policy PL1 General Housing Strategy which precludes development of greenfield sites outside of the settlement boundary.</p> <p>The development of the site would also work against the achievement of NP objective 8 Natural Environment, Green Spaces & Biodiversity and the site is located within the Battle of Lewes site.</p>	<ul style="list-style-type: none"> • Currently forms an important part of Lewes' green infrastructure, which provides a green corridor and access to countryside; • Immediately adjacent to local wildlife sites, TPO area and a Site of Importance of Nature Conservation; • Significant archaeological importance as it contains prehistoric burial mounds and is located within the Battle of Lewes site. • Site is in a remote location, far from local facilities and services, which is likely to result in further reliance upon private vehicles. • Potential negative effect on landscape character. This area is considered to have a high landscape value; and • Site is likely to contribute to light pollution and effect overall tranquillity.
42	Pells Schools	30 (across the whole site but part of site within	Partially in FZI	<p>The loss of the existing school within the local community would work against NP objective 1 Sustainable Communities. The site has potential access issues and a potential increase in traffic resulting from redevelopment could contribute to</p>	<ul style="list-style-type: none"> • Potential negative effect on landscape character. The open valley floor and early enclosure landscapes are likely to be highly sensitive to change.

Table 5: Alternative Sites Which fall within Flood Zone 1

Ref	Name	Number of dwellings	Flood Risk Zone	Reason that the site does not meet NP objectives	Potential significant negative effects identified in SA
		FZ2 and 3)		congestion pressures on the Kingsley Road junction.	<ul style="list-style-type: none"> Potential significant negative effect with respect to flooding, as part of the site lies within FZ3.
47	Saxonbury	10	FZ1	Sensitive location adjacent to Saxonbury Anglo-Saxon Cemetery which is a scheduled monument. It would therefore only be deemed appropriate to convert the existing building. Other sites are considered to deliver greater benefits and support in the achievement of the NP objectives such as Objective 7 Reduce Energy Demand. Site is outside of the settlement boundary.	No significant negative effects have been identified. Assessment assumes existing building would be redeveloped.
61	White Hart Hotel	14	FZ1	Redevelopment would lead to the loss of the hotel which could have negative effects on tourism and the local economy and would therefore work against the achievement of NP objective 8 supporting tourism and objective 1 Sustainable Communities which aims to ensure that the NP contributes to the creation of safe, sustainable and mixed communities that can progress into the future with good access to local jobs. Access from Station Road is difficult.	<ul style="list-style-type: none"> Site is located within AQMA and there is a risk of increasing car use by introducing new residents to this area, a significant negative effect has been identified. Site is located within an archaeological notification and conservation area. Located within the medieval core, with very high archaeological potential. Development would require evaluation trenching to clarify risk, the cost of which could make site financially unviable.

Table 6: Alternative Site Which falls within Flood Zone 2

Ref	Name	Number of dwellings	Flood Risk Zone	Reason that the site does not meet NP objectives	Potential significant negative effects identified in SA
06	Brooks Road	41	FZ2	The introduction of residential use here could restrict the effective operation of nearby commercial uses and this site therefore works against NP objective I Sustainable Communities which aims to ensure that the NP contributes to the creation of safe, sustainable and mixed communities that can progress into the future with good access to local jobs.	No significant negative effects have been identified.

Analysis has also been undertaken within Annex 2 to determine whether the more sensitive development use types within the 'screened in' sites can be directed to parts of the site where the risks are lower for both occupiers and the premises themselves. This exercise has concluded that it may well be possible for more sensitive development to be located in parts of the sites which are at lower risk of flooding, but this would need to be determined through site-specific FRA which would more accurately determine the Flood Risk Zones on site. See Annex 2 for more details.

Exception Test

Paragraph 102 of the NPPF establishes the need for the Exception Test to be applied where it is not possible for development to be located within areas with a lower probability of flooding. For the Exception Test to be passed it must be demonstrated that: the development provides wider sustainability benefits to the community that outweigh flood risk; and a site-specific flood risk assessment must demonstrate that 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. In light of potential changes to the extent of flood zones as a result of climate change impacts, the Site Profiles contain information to show how proposed site allocation would meet the Exception Test if it is proven necessary for any of the proposed housing development to be located within Flood Zone 3a. Information on the sustainability benefits of the proposed allocation is provided. In addition, the recommendations of the 2017 SFRA report¹³ are included, namely that all sites affected by fluvial flood risk, where necessary, provide flood resilient design that is evaluated in a site-specific FRA using current Environment Agency climate change guidance.

These sections of the Site Profiles indicate that each of the sites could pass the Exception Test based on their contributions to meeting the Neighbourhood Plan objectives and the positive sustainability benefits the sites will deliver (as set out within the Site Profiles). All of the allocations 'screened in' to the Sequential Test will need to be subject to deliver flood resilient design that is evaluated in a site specific Flood Risk Assessment (FRA) using current Environment Agency climate change guidance (and

¹³ South Downs National Park Authority (September 2017) Level 1 Update and Level 2 Strategic Flood Risk Assessment prepared by Amec Foster Wheeler

assessing flood risk from other sources such as groundwater, surface water, sewers and reservoirs) to ensure the proposed development itself will be safe from flooding over its lifetime and will not cause flooding elsewhere.

Conclusions

Utilising the methodology recommended by the NPPF, this report has assessed the sites proposed for allocation in the Lewes Neighbourhood Plan against their vulnerability to flooding. Seven sites out of the 17 allocations in the Neighbourhood Plan, that were screened for flood risk, contain land that is within Flood Zone 2 and/or 3.

These sites have been subject to more detailed analysis in terms of: whether any reasonable alternative sites within Flood Zone 1 or 2 were available that would still meet the objectives of the Lewes Neighbourhood Plan; and whether more vulnerable uses could be accommodated within sites on areas of lower flood risk. This information is set out in Site Profiles at the end of this report.

Alternative sites within Flood Zones 1 and 2 have been considered but the findings identify that the alternatives sites are not considered to meet the objectives of the Neighbourhood Plan as well as the selected sites. The alternative sites could also result in some significant negative sustainability effects relating to landscape character, heritage assets, accessibility, air quality, tranquillity and light pollution.

Analysis has also been undertaken to determine whether the more sensitive development use types within the 'screened in' sites can be directed to parts of the site where the risks are lower for both occupiers and the premises themselves. This exercise (see Annex 2) has concluded that it may well be possible for more sensitive

development to be located in parts of the sites which are at lower risk of flooding, but this would need to be determined through site-specific FRA which would more accurately determine the Flood Risk Zones on site.

The Exception Test has therefore been applied to the site allocations which fall within or contain areas within Flood Zones 2 and 3 where no alternative sites are available within Flood Zone 1 which could accommodate the development. The Exception Test sections of the site profiles set out the wider sustainability benefits to the community that these allocations would provide and demonstrate how these allocations will help to achieve the objectives of the Neighbourhood Plan. These sections of the Site Profiles indicate that each of the sites could pass the Exception Test based on their contributions to meeting the Neighbourhood Plan objectives and the positive sustainability benefits the sites will deliver (as set out within the Site Profiles). All of the allocations 'screened in' to the Sequential Test will need to be subject to deliver flood resilient design that is evaluated in a site-specific Flood Risk Assessment (FRA) using current Environment Agency climate change guidance (and assessment of flood risk from all sources) to ensure the proposed development itself will be safe from flooding over its lifetime and will not cause flooding elsewhere.

Criteria to manage flood risk have been included within the Lewes Neighbourhood Plan site allocation policies (PL1). The 'screened in' site allocations, if necessary, would therefore in principle pass the Exception Test.

The allocation sites that have passed the Sequential Test will still need to respond to and effectively mitigate any risk of flooding on the site, including because of climate change.

ANNEX 1

All Available Sites Considered in this Report

Site ref and name	Flood Zone	No. of dwellings	Status
1 Antiques Centre	FZ1	6	Not selected because the conversion would lead to the loss of the Antiques Centre which has both tourism and retail benefits and site is within the AQMA and could exacerbate air quality issues.
2 Astley House & Police Garage	FZ1	25	Selected
3 Auction Rooms	FZ2 and FZ3	11	Selected
4 Land Off Blois Road	FZ1	6	Selected
5 Land Off Blois Road (site B)	FZ1	6	Selected
6 Brooks Road	FZ2	41	Not selected because the introduction of residential use here could restrict the effective operation of nearby commercial uses. Also, concerns regarding noise and disturbance from neighbouring uses, potential for significant archaeological remains and undefended flood risk.
7 Buckwell Court	FZ2	5	Not selected as an allocation because it is considered to be too small. Would be considered a windfall site.
8 Buckwell Court Garage Site	FZ1	6	Selected
13 Former Wenban Smith Building	FZ3	11	No longer available as an allocation within the Lewes Neighbourhood Plan because it has been allocated within the SDNPA Local Plan.
18 Houndean Farm	FZ1	20	Not selected because the site has poor access to facilities and transport links; it lies outside the main settlement boundary; and the full extent of the site was unclear, with potential development to take place on greenfield land.
21 Kingsley Road Garage Site	FZ1	6	Selected
26 Land at Southdowns Road	FZ2 and FZ3	101	Selected
27 Land North of Houndean Rise	FZ1	28	Not selected as it currently forms an important part of Lewes' green infrastructure, which provides a green corridor and access to countryside. Site is immediately adjacent to local wildlife sites, TPO area and a Site of

Site ref and name	Flood Zone	No. of dwellings	Status
			Importance of Nature Conservation. Significant archaeological importance as it contains prehistoric burial mounds and is located within the Battle of Lewes site.
30 Landport Road Garages	FZ3	6	Not selected as site is outside of the Lewes Settlement Boundary.
34 Little East Street Car Park	FZ1	11	Selected
35 Lynchets Garage Site	FZ1	6	Selected
36 Magistrates Court Car Park	FZ2 and FZ3	9	Selected
39 Malling Street Ex Petrol Station	FZ2 and FZ3	5	Selected
40 Malling Street/Cliffe High Street Car Park	FZ2	2-3	Not selected as an allocation because it is considered to be too small. Would be considered a windfall site.
42 Pells Schools	FZ1, FZ2 and FZ3	30	Not selected because there were strong reservations about the loss of the existing school within the local community; potential access issues; potential increase traffic and congestion pressures on the Kingsley road junction; and site is partially located within Flood Zone 3.
44 Prince Charles Road Garage Site	FZ1	6	Selected
46 Queens Road Garage Site	FZ1	6	Selected
47 Saxonbury	FZ1	10	Sensitive location adjacent to Saxonbury Anglo-Saxon Cemetery. It would therefore only be deemed appropriate to convert the existing building. Other sites are considered to deliver greater benefits and support in the achievement of the NP objectives such as Objective 7 Reduce Energy Demand. Site is outside of the settlement boundary.
48 Secamb Ambulance HQ Site	FZ2 and FZ3	24	Selected
49 Spences Lane Garage Site	FZ3	6	Not selected due to flood risk and concern about deliverability due to multiple land owners
50 Spring Farm Barn	FZ1	5	Not selected following public consultation on the Pre-Submission Plan. It was identified that the site is outside of the Lewes Settlement Boundary and already has planning permission for 5 dwellings. The site also scored poorly in the SA at the Pre Submission stage.

Site ref and name	Flood Zone	No. of dwellings	Status
52 St Anne's Crescent	FZ1	12	Selected
53 St Anne's School	FZ1	35	Selected
56 St Pancras Gardens Garage Site	FZ1	5	Not selected as an allocation because it is considered to be too small. Would be considered a windfall site.
57 Station Car Park	FZ2 and FZ3	20	Selected
59 The Course Garage Site	FZ3	10	Not selected because it is in a sensitive location – within the archaeological notification and conservation area; constrained site with access issue; car parking pressures in the area; and within Flood Zone 3.
61 White Hart Hotel Annex	FZ1	14	Not selected because access from Station Road is difficult, loss of current hotel accommodation is likely to have negative impacts on tourism and the local economy and site is within the AQMA and could exacerbate air quality issues.

ANNEX 2

Site Profiles – Sites which are Screened in to the Sequential Test

Site Name and Address	PL1 (3), Land at the Auction Rooms
Existing Use	Auction rooms
Proposed Use	Residential development (11 dwellings)
Flood Risk	<p><u>Likely fluvial / tidal flood risk</u> Within Flood Zone 2 and 3 of right bank tributary of the River Ouse.</p> <p><u>Likely surface water flood risk</u> Site intersects surface water flow pathway.</p> <p><u>Likely groundwater flood risk</u> On chalk aquifer, overlain by alluvium associated with the Lewes Winterourne. Topographic setting indicates groundwater emergence likely.</p>
Screening Decision	In
Can the development be alternatively located to a site wholly within Flood Zone 1 (or Flood Zone 2)	No
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	<p>See the extent of flood risk for this site in Annex 3.</p> <p>According to the EA maps, approx. 88% of site is falls within Flood Zone 2. Approx. 2% of site falls within Flood Zone 3. Only approx. 10% of this site falls within Flood Zone 1. It is possible that more sensitive uses could be directed to the parts of the site which are less at risk from flooding. A site-specific FRA would determine this and would be able to more accurately determine the Flood Risk Zones on site.</p>
Exception Test	<p>Site could pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below. Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process.</p> <p>The site will help to achieve the following NP objectives:</p> <ul style="list-style-type: none"> • 1 Sustainable Communities

	<ul style="list-style-type: none"> • 4 Efficient Use of Land • 6 Easily Moving Around <p>The significant positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability (provision of 11 new dwellings); • <p>The minor positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA1 To improve the health and well-being of the population and reduce inequalities in health and well-being (located close to some parks and recreational areas; encourages walking and cycling); • SA3. To improve accessibility to all services and facilities (Well located close to town centre and facilities located there). • SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel (the site is well located in the centre of Lewes within easy walking distance of the train and bus stations). • SA10. Protect soil resources and make the most efficient use of land (site is brownfield) • SA15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town (Antique Centre has been relocated to an alternative site within the town. Allocation will not affect the town's economy. Development of the site will support the town centre by locating more residents within easy access to the businesses located there).
Site Name and Address	PL1 (8), Land at Buckwell Court, Garage Site
Existing Use	Garage block
Proposed Use	Residential development (6 dwellings)
Flood Risk	<p><u>Possible fluvial / tidal flood risk</u> Within 50m of Flood Zone 2 and 3 of the River Ouse; SDNPA project brief mentions possible history of flooding.</p> <p><u>Possible surface water flood risk</u> Potential flood risk to access.</p> <p><u>Possible groundwater flood risk</u> On chalk aquifer with topographic context (just raised above River Ouse flood plain) suggesting emergence of groundwater possible.</p>

Screening Decision	In
Can the development be alternatively located to a site wholly within Flood Zone 1?	At present, all of the development can be accommodated within Flood Zone 1 on-site.
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	See the extent of flood risk for this site in Annex 3. At present, all of the development can be accommodated within Flood Zone 1 on-site. A site-specific FRA would be required to ensure that the development can remain safe taking into account climate change.
Exception Test PASS	Site could pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below. Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process. The site will help to achieve the following NP objectives: <ul style="list-style-type: none"> • 1 Sustainable Communities • 4 Efficient Use of Land The significant positive sustainability effects that this site could deliver are: <ul style="list-style-type: none"> • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability (provision of 6 new dwellings) The minor positive sustainability effects that this site could deliver are: <ul style="list-style-type: none"> • SA10. Protect soil resources and make the most efficient use of land (Brownfield site currently occupied by residential garages).
Site Name and Address	PL1 (26), Land at Southdowns Road
Existing Use	Unused scrubland
Proposed Use	Residential development (79 dwellings), together with commercial uses including work space and employment
Flood Risk	<u>Likely fluvial / tidal flood risk</u> Within Flood Zone 2 and 3. <u>Surface water flood risk – Unknown</u> <u>Groundwater flood risk – Unknown</u>

Screening Decision	In
Can the development be alternatively located to a site wholly within Flood Zone 1?	No
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	<p>See the extent of flood risk for this site in Annex 3.</p> <p>According to the EA maps, approx. 80% of this site falls within Flood Zone 2 and approx. 20% falls within Flood Zone 3. It is possible that more sensitive uses could be directed to the parts of the site which are less at risk from flooding. A site-specific FRA would determine this and would be able to more accurately determine the Flood Risk Zones on site.</p>
Exception Test	<p>Site could pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below. Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process.</p> <p>The site will help to achieve the following NP objectives:</p> <ul style="list-style-type: none"> • 1 Sustainable Communities • 4 Efficient Use of Land • 6 Easily Moving Around <p>The significant positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA3. To improve accessibility to all services and facilities. (The site is within walking distance to large supermarkets and the main shopping area at Cliffe High St and benefits from some segregated walking routes). • SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. (The site is served by 5 main bus routes, which run into the town centre, the hospital, train station and further afield to Brighton and Newhaven). • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability (Site could provide 104 new dwellings). • SA10. Protect soil resources and make the most efficient use of land (Development proposed on an area of old scrubland, which is currently unused). <p>The minor positive sustainability effects that this site could deliver are:</p>

	<ul style="list-style-type: none"> SA1 To improve the health and well-being of the population and reduce inequalities in health and well-being (The nearest GP surgery is 0.6km (8 minutes' walk) away on Malling Street. There is a community and children's centre, with a play park, playing fields and a junior football club 350m north of the site). SA15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town (Development will support the town centre by locating more residents within easy access to the businesses located there).
Site Name and Address	PL1 (36), Land at Magistrates Court Car Park, Court Road
Existing Use	Car park
Proposed Use	Residential development (9 dwellings)
Flood Risk	<p><u>Likely fluvial / tidal flood risk</u> Within Flood Zone 2 and 3 River Ouse (according to the SDNPA SFRA 2017).</p> <p><u>Possible surface water flood risk</u> Potential flood risk to access.</p> <p><u>Likely groundwater flood risk</u> On chalk aquifer overlain by alluvium. Topographic context (floodplain location) suggests emergence of groundwater likely.</p>
Screening Decision	In
Can the development be alternatively located to a site wholly within Flood Zone 1?	No
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	<p>See the extent of flood risk for this site in Annex 3.</p> <p>According to the EA maps, 100% of this site falls within Flood Zone 2. It is possible that more sensitive uses could be directed to the parts of the site which are less at risk from flooding. A site-specific FRA would determine this and would be able to more accurately determine the Flood Risk Zones on site.</p>
Exception Test	<p>Site could pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below. Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process.</p> <p>The site will help to achieve the following NP objectives:</p> <ul style="list-style-type: none"> 1 Sustainable Communities 4 Efficient Use of Land

	<ul style="list-style-type: none"> • 6 Easily Moving Around <p>The significant positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA3. To improve accessibility to all services and facilities (The site is within close proximity to the Town Centre and benefits from good sustainable transport links, with both the bus and train station within walking distance). • SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. (The site is located 150m away from the town bus station, with several routes running around the town and further afield to Brighton and Newhaven. The train station is also within walking distance). • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability (The site could provide 9 new dwellings). <p>The minor positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA1 To improve the health and well-being of the population and reduce inequalities in health and well-being (The site is located close to the centre of town and backs onto backs onto the Railway Land Nature reserve. The bus station is 150m away (2 minutes') and the train station is located 0.5km (6 minutes' walk) to the train station). • SA10. Protect soil resources and make the most efficient use of land (brownfield site currently occupied by a car park)
Site Name and Address	PL1 (39), Land at Former Petrol Filling Station, Malling Street
Existing Use	Car sales and office block
Proposed Use	Residential development (5 dwellings)
Flood Risk	<p><u>Likely fluvial / tidal flood risk</u> Within Flood Zone 2 and 3 River Ouse.</p> <p><u>Possible surface water flood risk</u> Potential flood risk to access.</p> <p><u>Likely groundwater flood risk</u> On chalk aquifer overlain by alluvium. Topographic context (floodplain location) suggests emergence of groundwater likely.</p>
Screening Decision	In
Can the development be alternatively located	No

to a site wholly within Flood Zone 1?	
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	<p>See the extent of flood risk for this site in Annex 3.</p> <p>According to the EA maps, approx. 50% of this site falls within Flood Zone 3 and 50% falls within Flood Zone 2. It is possible that more sensitive uses could be directed to the parts of the site which are less at risk from flooding. A site-specific FRA would determine this and would be able to more accurately determine the Flood Risk Zones on site.</p>
<p>Exception Test</p> <p>PASS</p>	<p>Site could pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below. Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process.</p> <p>The site will help to achieve the following NP objectives:</p> <ul style="list-style-type: none"> • 1 Sustainable Communities • 4 Efficient Use of Land • 6 Easily Moving Around <p>The significant positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability. (This site could provide new housing with potential for some to be affordable). • SA10. Protect soil resources and make the most efficient use of land. (This would result in development of 0.04 ha plot which is previously developed land. The site is likely to be contaminated due to previous petrol station use). <p>The minor positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA1. To improve the health and well-being of the population and reduce inequalities in health and well-being. (GP surgery and town centre are both located nearby, within easy walking distance. There are opportunities for outdoor recreation nearby as it is located within approx. 200m of Malling Hill down land to the east; as well as allotment gardens). • SA3. To improve accessibility to all services and facilities. (The town centre and other local facilities, such as supermarkets are easily accessible to this site). • SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.

	(The site is located close to the bus station and is an approximate 15-20 min walk to the train station).
Site Name and Address	PL1 (48), Land at Former Ambulance Headquarters, Friars Walk
Existing Use	Garage block
Proposed Use	Residential development (18 dwellings)
Flood Risk	<p><u>Likely fluvial / tidal flood risk</u> Within Flood Zone 2 and 3 River Ouse (according to the SDNPA Level 2 SFRA 2017)</p> <p><u>Likely surface water flood risk</u> Site intersects surface water flow pathway.</p> <p><u>Possible groundwater flood risk</u> On chalk aquifer, topographic context (edge of floodplain) suggests ground water emergence is possible.</p>
Screening Decision	In
Can the development be alternatively located to a site wholly within Flood Zone 1?	No
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	<p>See the extent of flood risk for this site in Annex 3.</p> <p>According to the EA maps, approx. 50% of the site falls within Flood Zone 2 and 50% of the site falls within Flood Zone 1. It is highly possible, therefore, that more sensitive uses could be directed to the parts of the site which are less at risk from flooding. A site-specific FRA would determine this and would be able to more accurately determine the Flood Risk Zones on site.</p>
Exception Test	<p>Site could pass the sustainability elements of the Exception Test on basis of contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below.</p> <p>Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process.</p> <p>The site will help to achieve the following NP objectives:</p> <ul style="list-style-type: none"> • 1 Sustainable Communities • 4 Efficient Use of Land • 6 Easily Moving Around <p>The significant positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA3. To improve accessibility to all services and facilities. (The site is within a close proximity to the town centre (300m

	<p>to the High St) and has good sustainable transport access – located near to bus and train station).</p> <ul style="list-style-type: none"> • SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. (Site is located within walking distance of both the railway station and bus station). • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability. (The site could provide 19 new dwellings). <p>The minor positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA10. Protect soil resources and make the most efficient use of land. (Brownfield site currently occupied by NHS Ambulance HQ Offices). • SA12. To conserve and enhance the region’s biodiversity. (The site will develop some office space and car park into gardens. This would work towards enhancing biodiversity. The development also has the potential to provide a net gain in biodiversity through garden / landscape planting, bird and bat boxes). • SA15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town (Development of the site will support the town centre by locating more residents within easy access to the businesses located there).
Site Name and Address	PL1 (57), Lewes Railway Station Car Park
Existing Use	Car park
Proposed Use	Residential development (20 dwellings) over a decked car park
Flood Risk	<p><u>Likely fluvial / tidal flood risk</u> Within Flood Zone 2 and 3 River Ouse (according to the SDNPA Level 2 SFRA 2017).</p> <p><u>Likely surface water flood risk</u> Site intersects surface water flow pathway.</p> <p><u>Likely groundwater flood risk</u> On chalk aquifer, overlain by alluvium associated with the Lewes Winterbourne. Topographic setting indicates groundwater emergence likely</p>
Screening Decision	In
Can the development be alternatively located	No

to a site wholly within Flood Zone 1?	
Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?	<p>See the extent of flood risk for this site in Annex 3.</p> <p>According to the EA maps, 100% of this site falls within Flood Zone 2. It is possible that more sensitive uses could be directed to the parts of the site which are less at risk from flooding (i.e. highest ground). A site-specific FRA would determine this and would be able to more accurately determine the Flood Risk Zones on site.</p>
Exception Test	<p>Site could pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the NP objectives and the positive sustainability benefits the site will deliver, as set out below. Mitigation to be flood resilient design that is evaluated in a site specific FRA using current Environment Agency climate change guidance to be approved through the planning permission process.</p> <p>The site will help to achieve the following NP objectives:</p> <ul style="list-style-type: none"> • 1 Sustainable Communities • 4 Efficient Use of Land • 6 Easily Moving Around <p>The significant positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA3. To improve accessibility to all services and facilities. (The site is within a close proximity to the town centre. Good sustainable transport access – located near to bus and train station). • SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. (The site is well located in the centre of Lewes within easy walking distance of the train and bus stations). • SA5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability. (The site could provide 20 new dwellings). • SA10. Protect soil resources and make the most efficient use of land. (Brownfield site currently occupied by a car park). <p>The minor positive sustainability effects that this site could deliver are:</p> <ul style="list-style-type: none"> • SA1. To improve the health and well-being of the population and reduce inequalities in health and well-being. (The site is Located near to various parks and recreational facilities. Health care facilities are also located nearby with the nearest GP practice situated on Southover Road (less than a 5 min walk). Site is well located within the centre of Lewes and

	<p>therefore has good walking and cycling access to a range of facilities).</p> <ul style="list-style-type: none">• SA15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town (Antique Centre has been relocated to an alternative site within the town. Allocation will not affect the town's economy. Development of the site will support the town centre by locating more residents within easy access to the businesses located there).
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ANNEX 3

Flood Risk Maps¹⁴

¹⁴ Source of maps: <https://flood-map-for-planning.service.gov.uk/> accessed on 23/05/18

Flood map for planning

Your reference

PL1 (3)

Location (easting/northing)

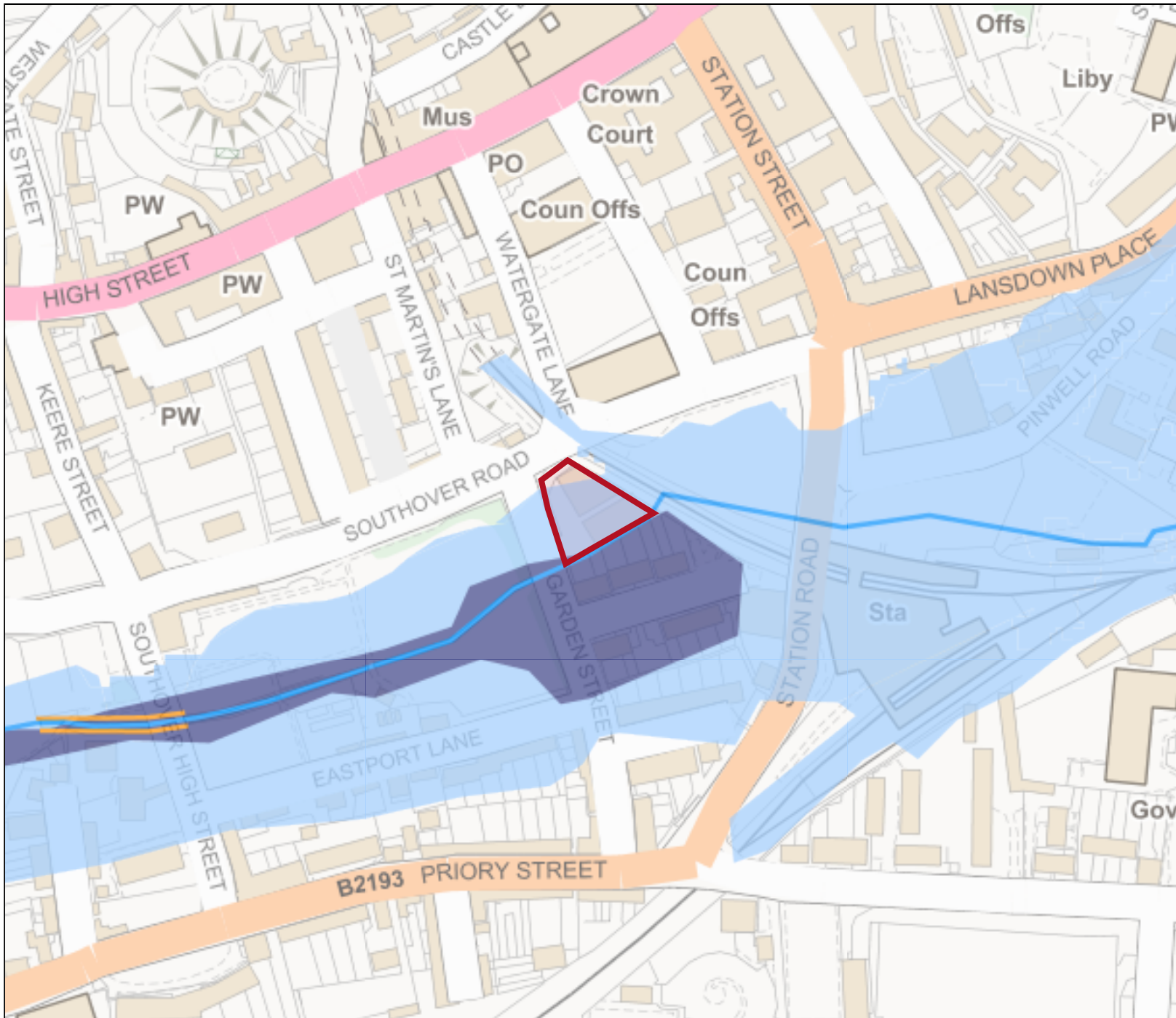
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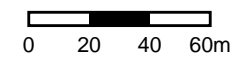
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Created

23 May 2018 1:34



-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area





Flood map for planning

Your reference

PL1 (8)

Location (easting/northing)








540413/111369

Scale

1:2500

Created

23 May 2018 1:39

-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



Flood map for planning

Your reference

PL1 (26)

Location (easting/northing)

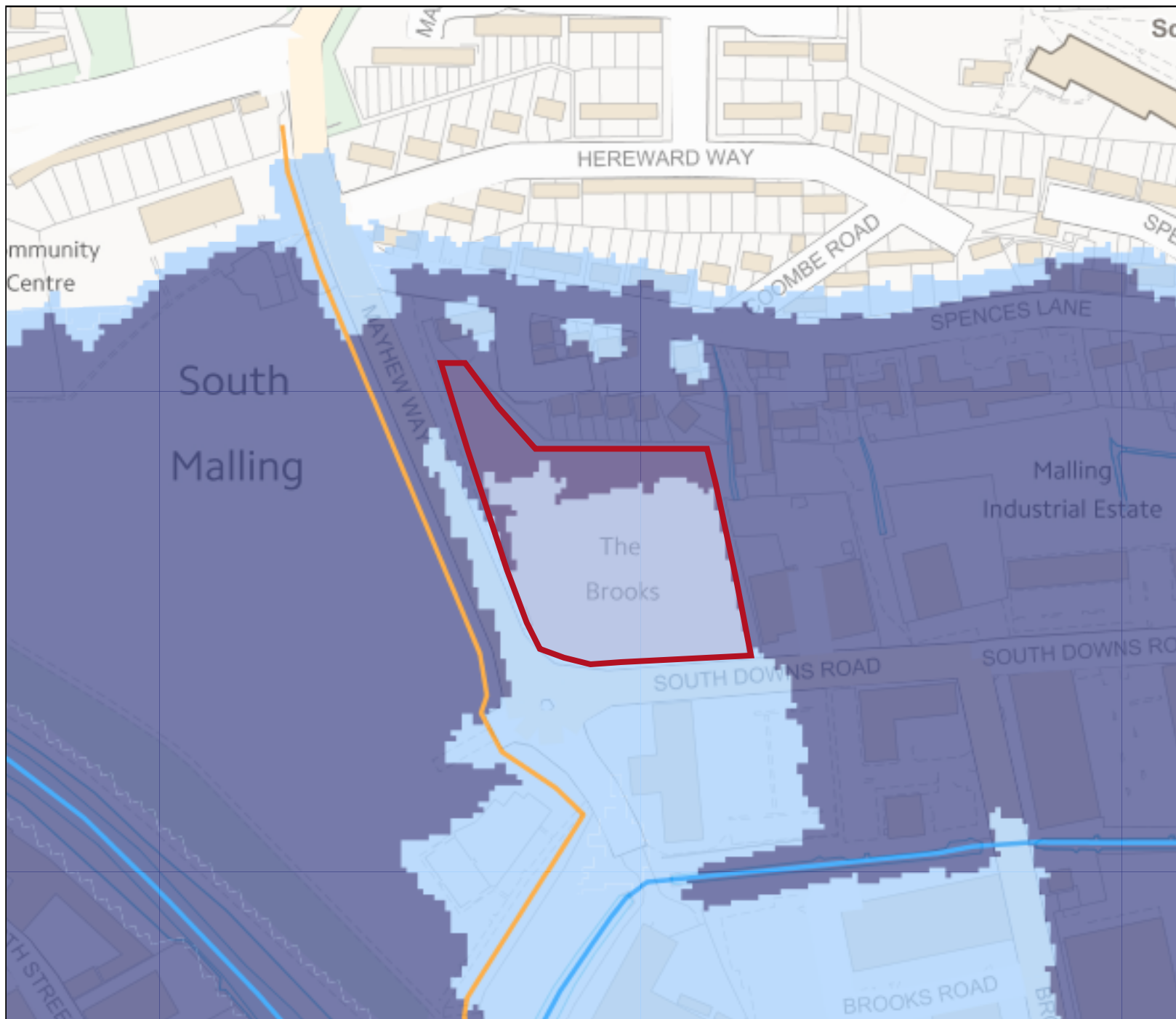
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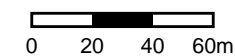
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23 May 2018 1:48



-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



Flood map for planning

Your reference

PL1 (36)

Location (easting/northing)

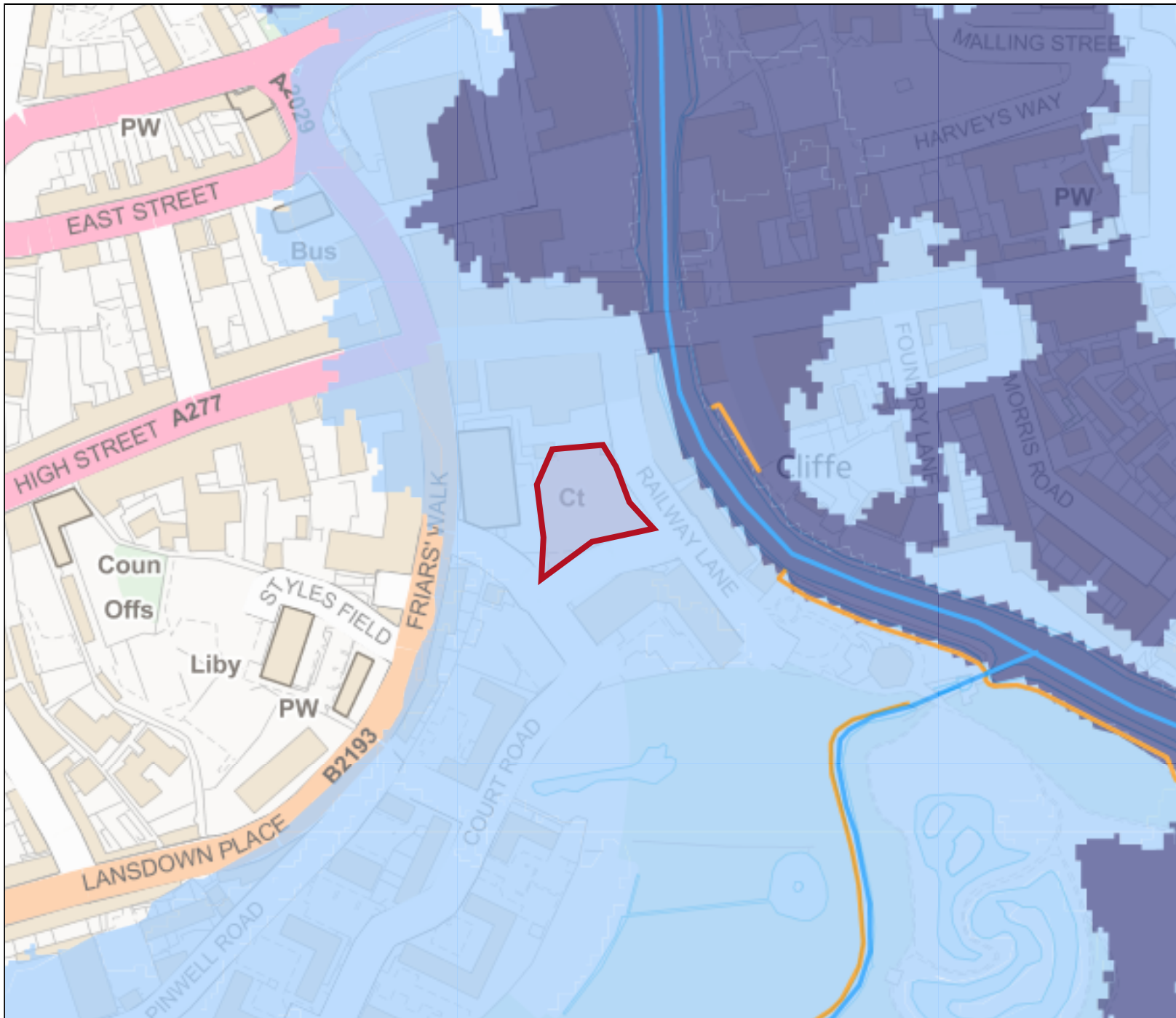
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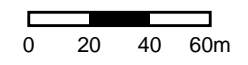
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23 May 2018 2:23



-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



Flood map for planning

Your reference

PL1 (39)

Location (easting/northing)

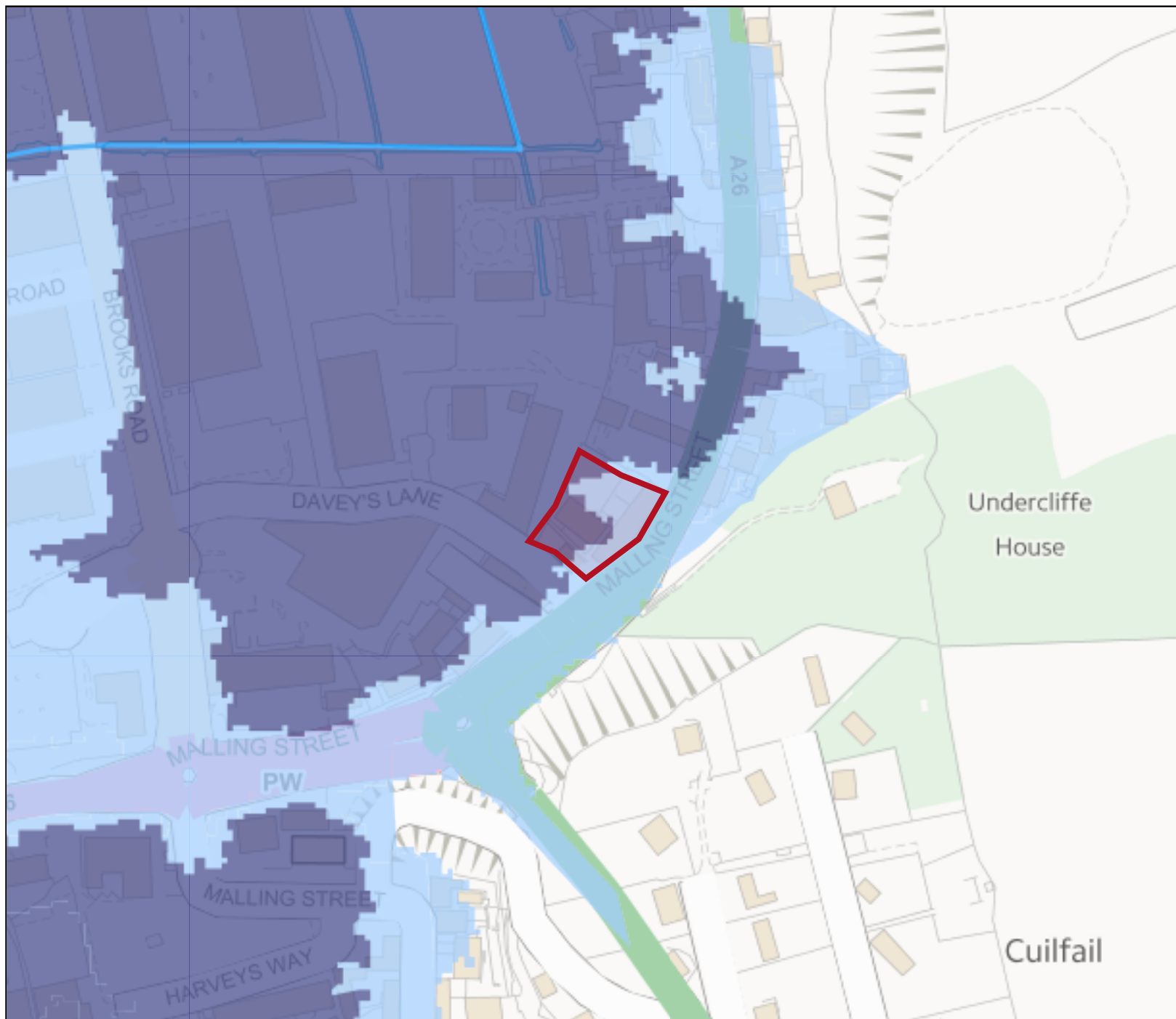
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Scale

1:2500

Created

23 May 2018 2:31



-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

0 20 40 60m

Flood map for planning

Your reference

PL1 (48)

Location (easting/northing)

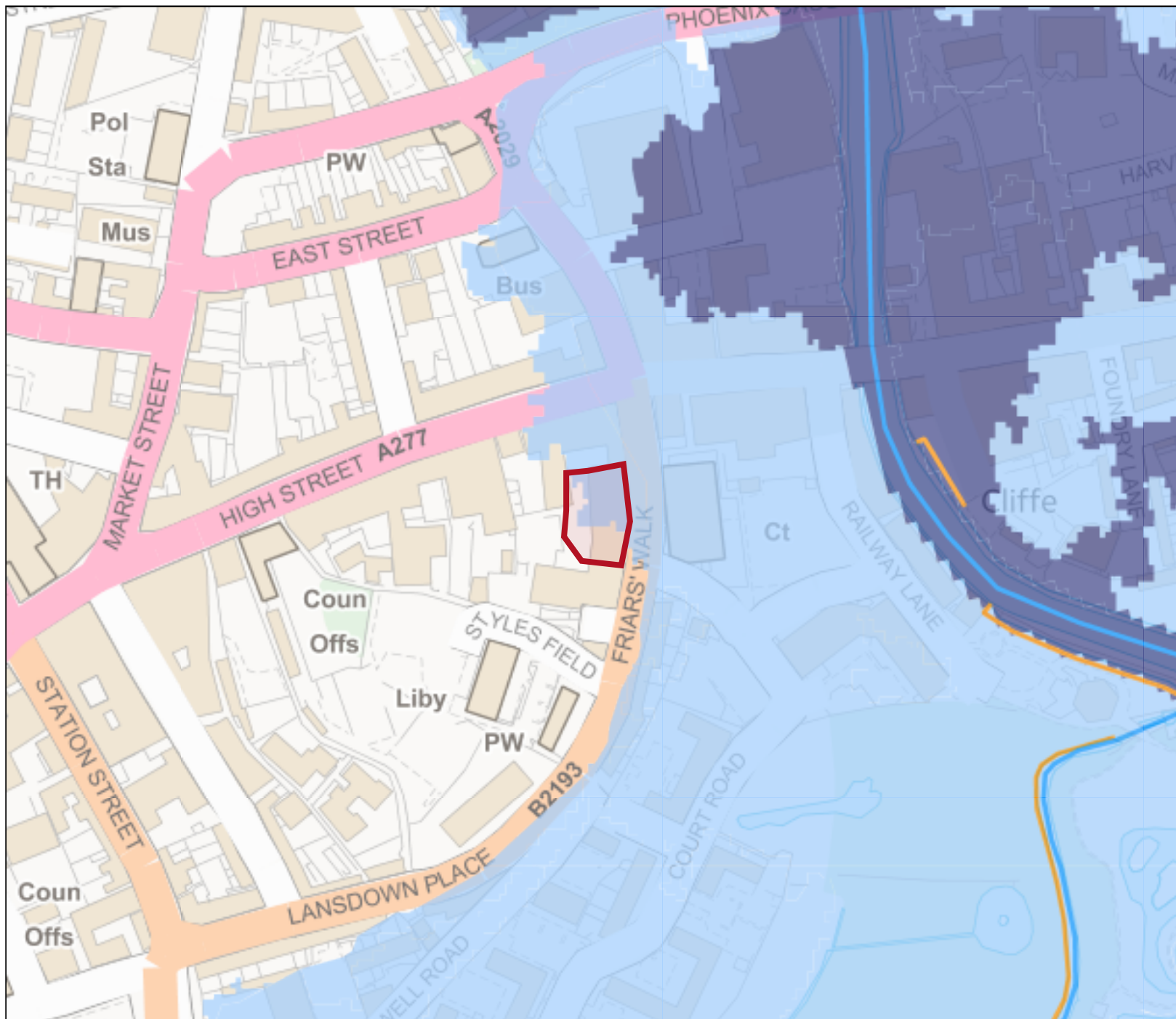
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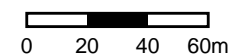
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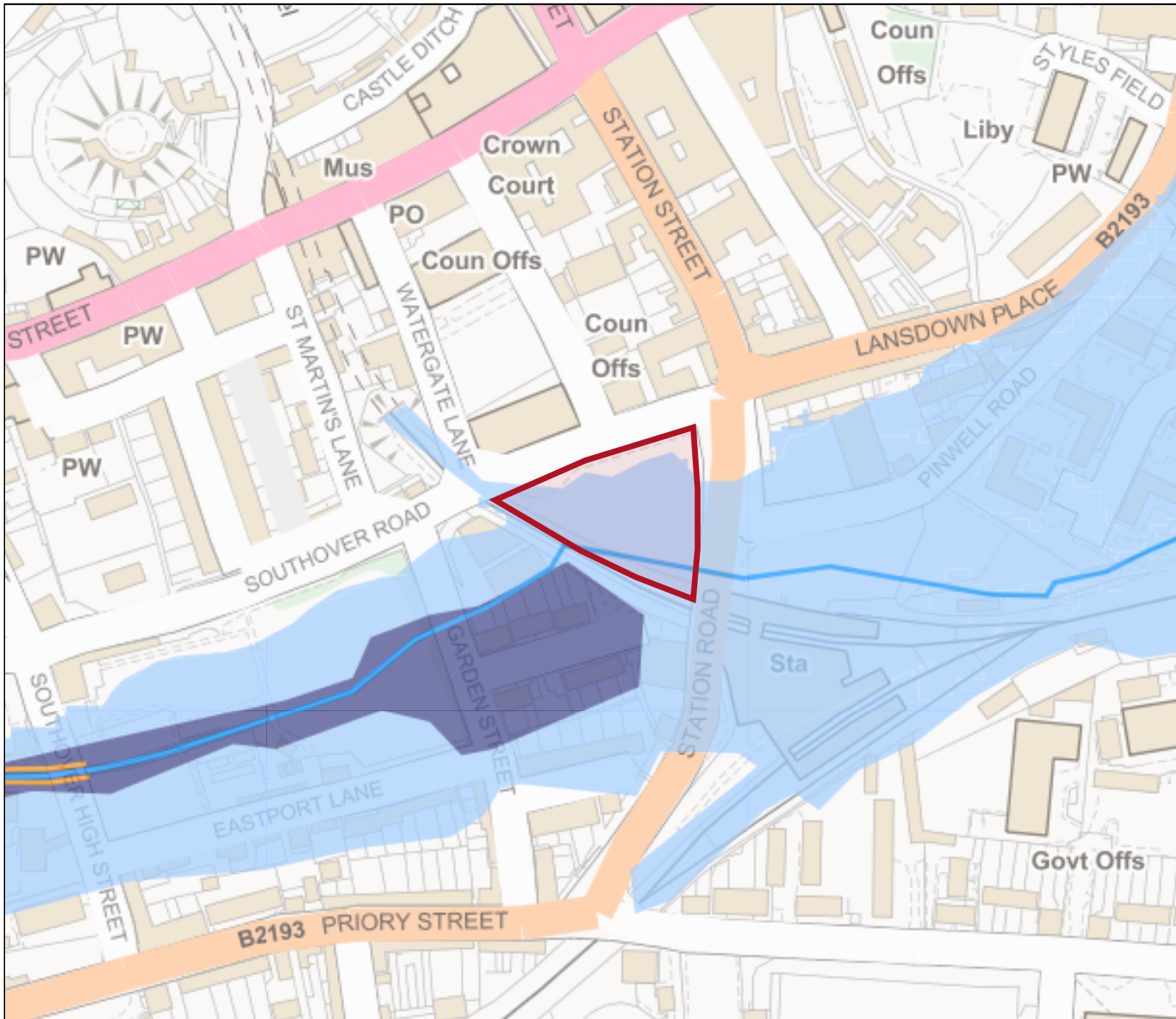
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23 May 2018 2:57



-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area










Flood map for planning

Your reference
PL1 (57)

Location (easting/northing)
541556/109902

Scale
1:2500

Created
23 May 2018 3:06

-  Selected area
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

