

## **Storrington Neighbourhood Plan Sequential Test**

### **1.0 Introduction**

- 1.1 This document has been prepared in support of the emerging Storrington, Sullington and Washington Neighbourhood Development plan. The purpose of this report is to demonstrate that even though some of the sites identified through the Storrington, Sullington and Washington Neighbourhood Development Plan (SSWNP) contain areas of flood risk, these areas are appropriate in the context of the Sequential and Exception Tests which are required as part of the National Planning Policy Framework (NPPF).
- 1.2 Further information relating to the explanation of Sequential/Exception Tests and when they are applicable in relation to the vulnerability of the proposed use is available in the NPPF and accompanying Planning Practice Guidance under Flood Risk and Coastal Change.
- 1.3 This report firstly explains the context in terms of national planning policy and local flood risk. It then identifies the sites in the draft Neighbourhood Plan where a Sequential or Sequential and Exception Test are required. It has taken into account comments made by both the Environment Agency and West Sussex County Council as the Lead Local Flood Authority.

### **2.0 Planning Context**

#### **The National Planning Policy Framework**

- 2.1 The NPPF (2012) provides the policy guidance in relation to the allocation of development sites in areas at risk of flooding. This is currently expanded further in the accompanying Planning Practice Guidance: Flood Risk and Coastal Change.
- 2.2 National planning policy guidance seeks to ensure that inappropriate development does not come forward in areas at risk of flooding by directing development away from areas at highest risk. Where development is found to be necessary in areas that are identified to be at risk from flooding, the Sequential and Exception Test must be applied. Where development needs to be in locations where there is a risk of flooding as alternative sites are not available, local planning authorities and developers ensure development is appropriately flood resilient and resistant, safe for its users for the development's lifetime, and will not increase flood risk overall.

#### **Horsham District Local Development Framework (November 2015)**

- 2.3 The relevant District Level planning documents which are of relevance to the Storrington, Sullington and Washington Neighbourhood Plan are the Horsham District Planning Framework (HDPF) and in the South Downs National Park, The Horsham District Core Strategy and emerging Local Plan. As the sites

which are being considered for development are outside Horsham District, the key policy considerations in relation to this report is the (HDPF). The HDPF sets out the planning strategy for the District to the year 2031, to deliver the social, environmental and economic needs of the District. Policy 38 'Flooding' seeks to ensure new and existing development is not adversely affected by flooding. This policy was underpinned by the Strategic Flood Risk Assessment (April 2010) and Sequential Test, (April 2014) that was undertaken during the development of this plan.

- 2.4 The SSWNP will form part of the development plan together with the HDPF, and will be used to influence and manage development in the neighbourhood plan area. The draft plan document identifies seven sites for housing and one site for employment use, and it is therefore necessary to apply the sequential test in relation to these proposals.

### **3.0 Local Flood Risk Context**

- 3.1 The Storrington, Sullington and Washington neighbourhood plan area has a total administrative area of 34km<sup>2</sup> and is predominately rural. There are two main built areas comprising Washington village in the east of the plan area, and the Storrington, Sullington and Heath Common 'conurbation' to the west. The River Stor, a tributary of the River Arun, runs through the centre of Storrington, consequently, some of the village is subject to Flood Zones 2 and 3.
- 3.2 The river is the predominant source of flood risk within the neighbourhood plan area, although there is risk of flooding from groundwater, surface water and sewer flooding to a lesser extent. It should however be noted that the Horsham District Strategic Flood Risk Assessment (Final Report- Revised 2010) did not identify any records of groundwater flooding in the District.
- 3.3. Pluvial flooding , which typically arises when intense rainfall, often of short duration, is unable to soak into the ground and/or enter drainage systems, has been noted to have affected a large number of properties in the District, during heavy rainfall events. Mapping undertaken by the Environment Agency, of the settlements identified to be at risk of surface water flooding, 370 affected properties were in Storrington (Defra 2009).
- 3.4 Pluvial flooding has been noted to have affected roads in Washington during heavy rainfall events. During these events, rainfall flows along the road surface and ponds in topographic lows, causing disruption to transport and in some cases property flooding. The risk of surface water flooding is heightened where surface water sewers have insufficient capacity, where drains are susceptible to blockages and where the groundwater level is already high, thereby reducing the capacity for infiltration (SFRA, 2010).

## **4.0 Sequential and Exception Test**

- 4.1 A Sequential and Exception Test for the eight sites proposed for residential and commercial use through the SSWNP is outlined below. Table 1 identifies those sites which are proposed for development and identifies where the developable area will include areas wholly or partly affected by flood risk (i.e. Flood Zones 2 or 3). This has been established through the use of up-to-date flood modelling which includes the 2010 SFRA.
- 4.2 The table indicates the flood zone type, the vulnerability of the use proposed and the subsequent requirement for the Sequential and/or Exception Test to be applied. The requirement for a Sequential and/or Exception Test has been informed by the Planning Practice Guidance Flood Risk and Coastal Change (2014). Further information on each site is set out in section 5 below.

### *Consideration of Alternative Sites*

- 4.3 A number of alternative development sites have been proposed to the Parish for consideration during the preparation of the plan. These have been considered against a range of sustainability criteria as part of both the sustainability appraisal and separate site assessment processes. This included flood risk. It should however be noted that sites which are not impacted by flood risk have not necessarily been included in the draft plan, due to other planning and sustainability considerations such as lack of access or landscape constraints.

## **5.0 Sequential and Exception Test**

### *Land at Robell Way, Sullington (Paula Rosa site)*

- 5.1 The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. The Environment Agency Flood Risk Map reports some areas at risk of surface water flooding, particularly in the western corner<sup>1</sup> and along Water Lane which includes access into the site. It should be noted that this site has already been granted planning permission,(DC/15/2788) and detailed consideration of flood risk was undertaken during the determination of this application.

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<sup>1</sup> \* Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding. Because of this, the Environment Agency report the highest risk within 20m of a specific location, such as an individual property. This means reports for neighbouring properties may show different levels of risk. Areas not indicated for flooding risk does not mean that it will not possibly be at risk – purely that the available mapping and records do not show it at risk.

**Table 1: Strategic Sites: Sequential and Exception Test**

Site Ref	Site Name	Flood Zone/type	Whole or part of site affected	Proposed use	Vulnerability of use	Sequential Test	Exception Test	Flood Risk Assessment
1.	Land at Robell Way, Sullington (Paula Rosa site)	Flood Zone 1		Residential	More Vulnerable	Passed	N/A	N/A
2.	Land at Old London Road (The Vineyard), Washington	Flood Zone 1		Residential	More Vulnerable	Passed	N/A	N/A
3.	Land off North Street (Old Ryecroft allotments), Storrington	Flood Zone 2	Approximately 50%	Residential	More Vulnerable	Yes	Yes	Yes
4.	Ravenscroft allotment site, Storrington	Flood Zone 1		Residential	More Vulnerable	Passed	N/A	N/A
5.	Former Sand Pit off of Water Lane, Sullington	Flood Zone 1		Residential	More Vulnerable	Passed	N/A	N/A
6.	Land at Old Mill Drive, Storrington (reserve site)	Flood Zone 1		Residential	More Vulnerable	Passed	N/A	N/A
7.	Land at the Post Office Depot, Storrington (reserve site)	Flood Zone 1		Residential	More Vulnerable	Passed	N/A	N/A
8.	North Farm, near Washington	Flood Zone 1		Commercial	More Vulnerable	Passed	N/A	N/A

*Land at Old London Road (The Vineyard), Washington*

- 5.2. The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. No areas of surface water flood risk have been identified within the site.

*Land off North Street (Old Ryecroft allotments), Storrington*

- 5.3 50% of the site is located in flood Zone 1. The eastern section of the site adjoins the River Stor, a tributary of the River Arun. As such approximately 50% of the site is located within Flood Zones 2 and 3. Whilst the western part of the site passes the sequential test, it is necessary to consider whether it is appropriate to allocate the rest of the site.
- 5.4 As has already been set out in paragraph 4.3, a number of sites have been considered for inclusion in the Storrington, Sullington and Washington Neighbourhood Plan, through a site assessment and the Sustainability Appraisal process. The number of potential sites in the Storrington area which meet a range of sustainability criteria are limited, due to a number of constraints affecting the settlements including the proximity to the south downs national park, and the need to be in accordance with policies set out in the HDPF.
- 5.5 The HDPF has an expectation that at least 1500 homes will be delivered through neighbourhood planning. Development would be expected to come forward in accordance with policy 3 of the HDPF which identifies Storrington as a larger town or village and development of an appropriate nature and scale to maintain the characteristics and function of this settlement is acceptable in general terms.
- 5.6 It is therefore necessary for the Parish to consider the balance of the need to deliver housing against other constraints including flooding. Given the lack of other available and suitable sites it is considered that this site will ensure the District can meet its housing demand and help the local economy to grow. Based on this the proposed allocation passes the Sequential Test, but the exception test has been applied.

**Exception Test:**

**Options for addressing Flood Risk & their feasibility**

**On-site strategic measure:**

A detailed flood risk assessment must be undertaken. No built development should take place in Flood Zone 3 unless a further exceptions test is undertaken. It is suggested that this is incorporated into the policy wording.

### **Additional on site measures**

In order to sustainably manage flood risk on site and to ensure flood risk is not increased elsewhere, the development will be required to incorporate a SuDS scheme. The scheme will be detailed within a site specific flood risk assessment and designed to current policy and best practice, which will manage rainfall run-off rates and volumes to existing pre-development rates and mimic the natural drainage regime of the site.

To ensure that residents of any development on this site are not placed at risk of flooding at the current time or in the future no habitable rooms should be provided on the ground floor and flood resilient design and construction techniques should be used. This should be set out in the neighbourhood plan.

#### *Overall Conclusion:*

- 5.7 A significant portion of the site is located within Flood Zone 1 and therefore a sequential approach will be taken across the site to ensure all development is placed outside the highest risk zones.

#### *Ravenscroft allotment site, Storrington*

- 5.8 The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. The Environment Agency Flood Risk Map reports no areas at risk of surface water flooding within this site.

#### *Former Sand Pit off of Water Lane, Sullington*

- 5.9 The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. The Environment Agency Flood Risk Map reports no areas at risk of surface water flooding within this site.

#### *Land at Old Mill Drive, Storrington (reserve site)*

- 5.10 The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. The Environment Agency Flood Risk Map reports no areas at risk of surface water flooding within this site, however there is a small area at risk of surface water flooding along Mill Lane which runs along the eastern boundary of the site.

#### *Land at the Post Office Depot, Storrington (reserve site)*

- 5.11 The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. The Environment Agency Flood Risk Map reports no areas at risk of surface water flooding within this site.

*North Farm, near Washington*

- 5.12 The site is identified as being at low risk in Flood Zone 1 and therefore meets the requirements of the Sequential Test. The Environment Agency Flood Risk Map reports no areas at risk of surface water flooding towards the entrance to the site but nothing within the site itself.

**6.0 Conclusion**

- 6.1 With the exception of Land off North Street (Old Ryecroft allotments), (Policy 2iii) the SSWNP allocates land which is in Flood Zone 1.
- 6.2 With regards to the Land off North Street, this document has demonstrated that the Sequential and Exception Test approach has been undertaken and met. It has shown that the development type/scale to be allocated can, in principle, be delivered appropriately in relation to flood risk.
- 6.3 In line with the NPPF, detailed Flood Risk Assessments will remain a necessary and important part of the planning application process for all sites that are allocated in the plan.