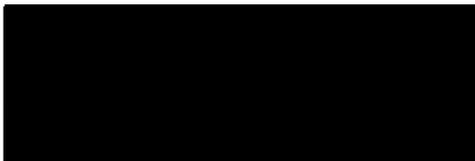


Hastings Local Plan
Development Management Plan
Sequential Testing of Site Allocations

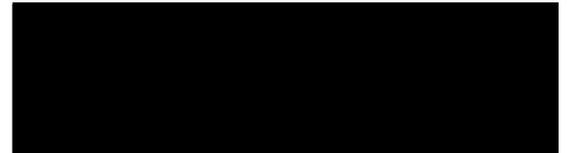
December 2012

Prepared by:



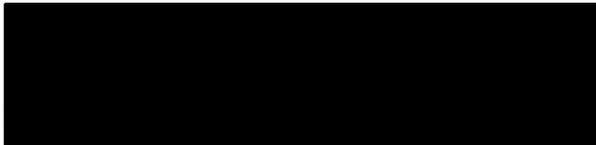
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Appendix C – Site Profiles

Capabilities on project:
Water

1. Introduction

National Policy Context

The publication of the National Planning Policy Framework (NPPF) in March 2012 set out the Government’s planning policy for England and the framework with which these policies are expected to be applied. This document must be taken into account in the preparation of local and neighbourhood plans. The NPPF advises the use of a sequential approach to determine appropriateness of developments within areas that are at flood risk.

The sequential approach within the NPPF is a decision making tool designed to ensure that development is steered away from areas at high risk of flooding, where possible.

Local Policy Context

Translation of NPPF advice into a list of approved developable sites requires the formation of local strategy and a rigorous assessment of the available sites for development. The policy levels of this process in the context of flood risk and the position of this document are shown in Figure 1 below:

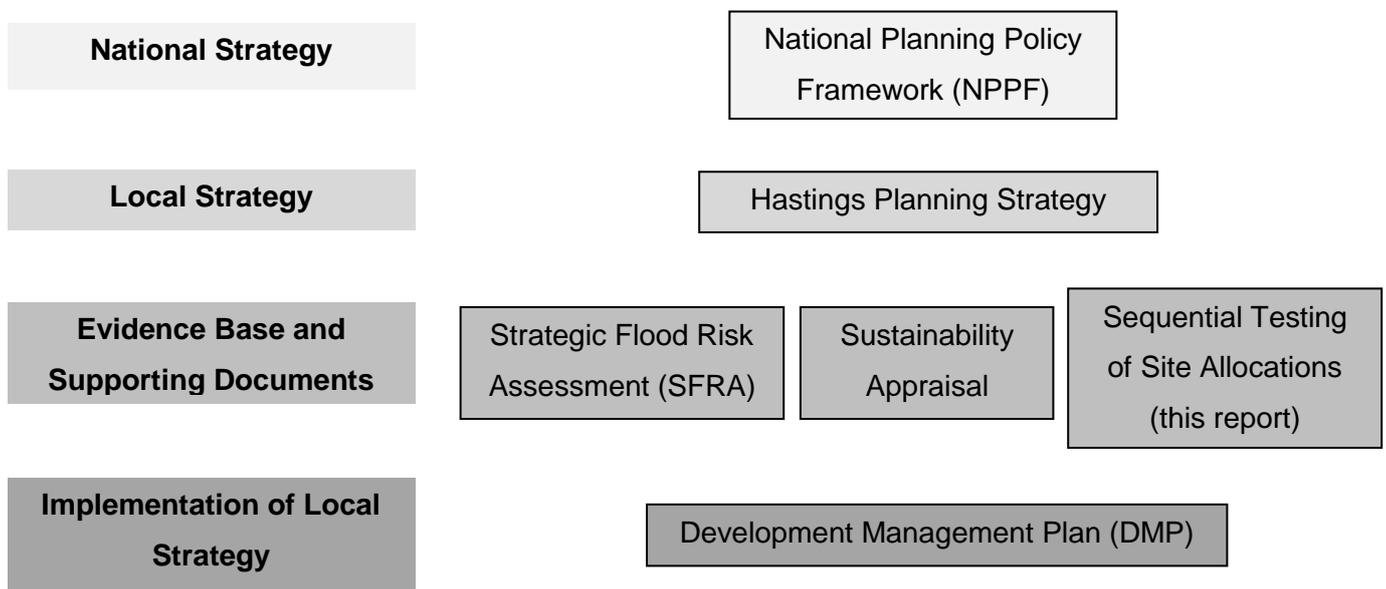


Figure 1 – Context of documents referenced in this report within overall planning framework

Capabilities on project:
Water

To determine the most suitable areas of development in term of flood risk, the Sequential Test is prescribed in the NPPF. AECOM have undertaken the sequential testing of site allocations in the Development Management Plan (DMP) on behalf of Hastings Borough Council (HBC), utilising flood risk data from the Hastings SFRA (2008) which has been supplemented by the most up-to-date Environmental Agency Flood Zone Mapping (August 2012 update).

This report forms the evidence base to prove that the Sequential Testing methodology has been applied in accordance with NPPF in allocating development sites within the Borough.

Strategic Context

In the context of NPPF, the overall aim is to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, local planning authorities allocating land in local plans or determining planning applications for development at any particular location should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

In addition, the NPPF requires the assessment of flood risk in areas of proposed development '*should be planned to avoid increased vulnerability to the range of impacts arising from climate change.*' Any new development that is brought forward in areas which have potential to be vulnerable to flooding should ensure that any risks are managed effectively. The NPPF highlights that these risks should be managed by '*suitable adaption measures*' and ought to include green infrastructure. In addition the new development should not increase flood risk anywhere else.

With regards to the NPPF and Local Plans, the NPPF states that this should be supported by the Strategic Flood Risk Assessment (SFRA). Hastings SFRA was prepared by Faber Maunsell and published in May 2008. Furthermore *Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.* The NPPF requires application of the Sequential Test to the allocation of sites at a strategic level and within allocated sites at site masterplanning level.

Where potential developments sites fall into more than one flood zone category, development should be steered towards the lowest flood risk area within the site. This means that development layouts must, where possible ensure that higher vulnerability uses are in the lower risk areas of the site. This allows for development to occur whilst accounting for the flood risk bounded by the sequential approach within the NPPF.

Capabilities on project:
Water

Local Context

The Hastings Planning Strategy provides for a target of 3,400 net new homes and up to 70,000 m² of new employment floor space by 2028. Housing density is prescribed in the Strategy as being a minimum of 40 dwellings per hectare (dph) in sustainable locations such as town and district local centres, and at least 30dph in all other locations. One of the main purposes of the Development Management Plan is to allocate sites to meet these targets.

Regeneration is a key priority of the Council, and this is reflected in the objectives of both the Hastings Planning Strategy and the DMP. Given the constrained nature of the town and the lack of available sites, it has been unavoidable not to allocate some sites for development that are affected by flood risk. In particular, this relates to the larger “West Marina” area, comprising of 3 development sites in an area that will contribute significantly to the social and economic objectives of the Planning Strategy and DMP.

Regeneration of such coastal sites is also important in terms of encouraging visitors and tourism in Hastings, to enable the town to effectively compete with other seaside resorts on the south coast of England. New attractions are being encouraged in the development strategy that have the potential to promote a diverse town whilst maintaining sustainability. It is appreciated that this requires some development within fluvial and coastal flood zones and therefore some sites may require the Expectation Test to be applied to ensure adequate justification of the wider sustainability objectives to support the development. It is considered that the social and economic benefits from allocating these sites for regeneration, primarily due to their key urban locations, outweigh the benefit of relocating these developments to sites at lower risk of flooding.

Capabilities on project:
Water

2. Methodology

Sequential Test Methodology

General Process

Application of the Sequential Test and Exception Test in this report conforms to the approach in the NPPF Technical Guidance, Table 2. Figure 2 shows the sequential approach described in the Hastings SFRA that has been adopted to identify the suitability of a site for allocation in relation to the flood risk classification. Whilst the SFRA was written in the context of previous flood risk planning guidance, PPS25, it has been verified as compliant with NPPF (Note: Water-Compatible development is not included in this flowchart as there are no developments matching this description included in the Hastings DMP).

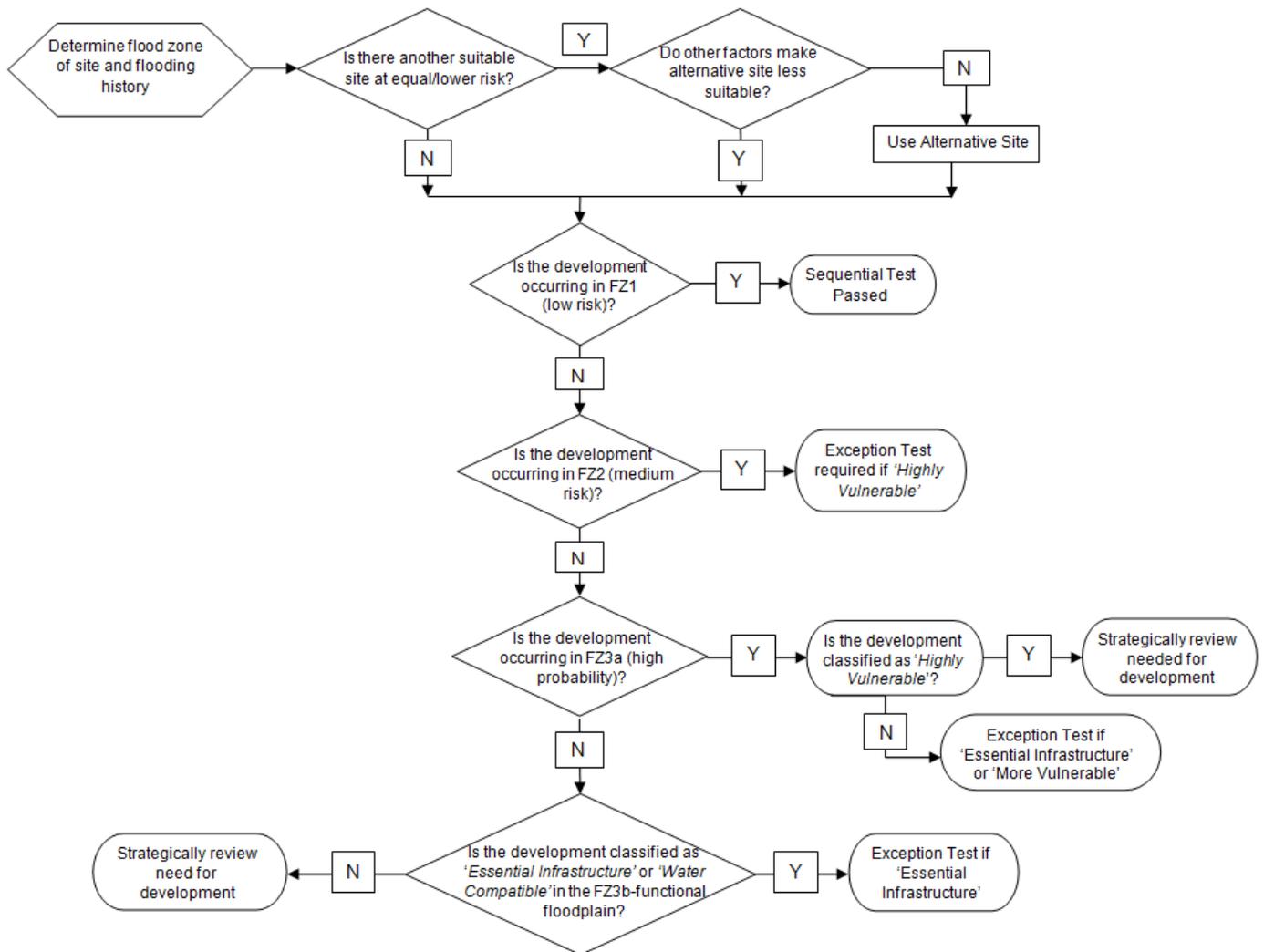


Figure 2: Adopted Sequential Test Process

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The Sequential Test aims to steer new development, to areas of the lowest probability of flooding (i.e. Flood Zone 1- Low Probability see Table 2). If, following the application of the Sequential Test, a chosen development did not meet the criteria of acceptability for that site, should be removed from the allocations. Flood Risk Vulnerability Classification from the NPPF indicates the suitability of development to each flood zone. The Flood Risk Vulnerability Classifications are detailed below in Table 1 (from NPPF).

Table 1: Flood Risk Vulnerability Classifications

<u>Appropriate Use Classification</u>	<u>Examples of Classification</u>
Essential Infrastructure	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons need to remain operational in times of flood. • Wind turbines.
Highly Vulnerable	<ul style="list-style-type: none"> • Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use • Installations requiring hazardous substances consent
More Vulnerable	<ul style="list-style-type: none"> • Hospitals. • Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non–residential uses for health services, nurseries and educational establishments. • Landfill and sites used for waste management facilities for hazardous waste • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.
Less Vulnerable	<ul style="list-style-type: none"> • Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for shops, financial, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non–residential institutions not included in “more vulnerable”, and assembly and leisure. • Land and buildings used for agriculture and forestry. • Waste treatment (except landfill and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).

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Water Compatible Development	<ul style="list-style-type: none"> • Flood control infrastructure. • Water and Sewage transmission infrastructure and pumping stations. • Sand and gravel working. • Docks, marinas and wharves. • Navigation facilities. • Ministry of Defence, defence installations. • Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. • Water-based recreation (excluding sleeping accommodation). • Lifeguard and coastguard stations. • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation. • Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.
-------------------------------------	--

As can be seen from Table 1, the Flood Vulnerability Classification highlights the risk associated with coastal flooding as well as fluvial flooding. This has been adopted for the Sequential Test by HBC for future development.

Table 2 describes the flood zones which form the basis of the Sequential Test as prescribed in NPPF. These are in accordance with the Environment Agency's (EA) recommended definitions.

Table 2: Flood Risk Zones Description

Zone	Description	Annual probability of river or sea flooding	Appropriate uses
Zone 1	Low probability	1 in 1000 (<0.1%)	<ul style="list-style-type: none"> • All uses
Zone 2	Medium probability	1 in 100 – 1 in 1000 (river) (1-0.1%) 1 in 200 – 1 in 1000 (sea) (0.5-0.1%)	<ul style="list-style-type: none"> • Water Compatible • Less Vulnerable • More Vulnerable • Essential Infrastructure • Highly Vulnerable only if Expectation Test passed
Zone 3a	High Probability	1 in 100 or greater (river) (>1%) 1 in 200 or greater (sea) (>0.5%)	<ul style="list-style-type: none"> • Water Compatible • Less Vulnerable • More Vulnerable only if Expectation Test passed • Essential Infrastructure only if Expectation Test passed

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Water

Zone 3b	The functional floodplain. This zone comprises land where water has to flow or be stored in times of flood.	1 in 20 or greater (5%) or land which is designed to flood in an extreme (0.1%) flood.	<ul style="list-style-type: none"> • Water Compatible • Essential Infrastructure only if Expectation Test passed
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The application of the sequential approach aims to manage flood risk principally by avoidance of the risk. This prevents the allocation of sites that are inappropriate on flood risk grounds. When determining planning applications, the Council will ensure flood risk is not increased elsewhere, only consider development appropriate in areas at risk of flooding where informed by a site-specific flood risk assessment following the Sequential Test.

If following the application of the Sequential Test, the development is not appropriate on flood risk grounds, but consistent with wider sustainability objectives (as identified in the Sustainability Appraisal) the Exception Test can be applied if appropriate.

Development Management Plan Site Allocations - Specific Analysis Methodology

The EA have indicated that the sequential test should give regard to the following attributes:

- Flood Zone Classification
- Vulnerability Classification
- Historical flood incidents

The first two classifications were taken into account while undertaking the Sequential Testing. The third item on the list; historical flood incidents, has been analysed in the Hastings DMP and Sustainability Appraisal; documents which were informed by the Hastings SFRA and Surface Water Management Plan (SWMP). The historical flood events are also considered in the Sequential Testing of development sites, in the next section of the report, but only as supporting evidence rather than being a key decision tool. Similarly, as surface water flooding has been considered in these other documents, it is not prescribed as part of the test itself.

The GIS (Geographical Information Systems) data of the extents of Flood Zones and potential development sites has been provided by HBC. The particular layers are known to be created from the following sources:

- Flood Zones 2 and 3a – EA modelling outputs, updated August 2012
- Flood Zone 3b – Hastings SFRA, May 2008 (produced by Faber Maunsell)
- Site boundaries – Produced by HBC

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A GIS analysis exercise was conducted to identify the sites with significant areas within Flood Zones 2, 3a and 3b using a 'search by interception' algorithm between the allocated sites and the Flood Zones.

For the purpose of this study; sites within Flood Zone 1 have not been explored in great detail. This is because Flood Zone 1 is considered from NPPF definitions to be of low probability of flooding, as described in Table 2. Only one site within the DMP assessments was found to fall within Flood Zones 1 and 2, but not 3a or 3b: the site is HTC2 (Cornwalis Street Car Park). Whilst being in Flood Zone 2 does not preclude most forms of development, it is recommended that the issue is highlighted and appropriate policies are included in the DMP.

Exception Test Methodology

The Exception Test provides a method of managing flood risk while still allowing necessary sustainable development to occur. The test is only appropriate for use when there are large areas in Flood Zones 2, 3a and 3b, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary for wider sustainable development reasons.

The Exception Test needs to demonstrate that *“within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location”* and the development is *“appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.”*

To conduct the exception test at strategic level, a site-specific profile was produced for each site in the Development Management Plan with significant area within flood zones 2/3a/3b bringing the site into focus to help identify measures (refer to Appendix C for site profiles). It is recommended that these profiles are made available to developers for planning applications and site-specific flood risk assessments (FRA's) to help them ensure that they are able to satisfy the Council's requirements for the Exception Test.

Sustainability Appraisal

HBC initially selected 138 potential development sites as part of the Strategic Housing Land Availability Process (SHLAA) and analyzed their suitability for development through a Sustainability Appraisal. This appraisal was conducted alongside the Sequential Testing to help to inform the Development Management Plan in terms of potential development sites in Hastings. The aim was to determine the sustainability of developing potential development areas within Hastings using quantitative assessment criteria. With regards to flood risk, the Sustainability Appraisal took into consideration Flood Zones 2 and 3, surface water flood risk issues and historic flood hotspots as identified in the Hastings SFRA.

Key issues this process needed to address in addition to fluvial flood risk included:

- Surface water flood risk
- Historic Flooding

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- Proximity to Local Wildlife Sites
- Proximity to Sites of Special Scientific Interest (SSSI)
- Proximity to cycle pathways and footpaths
- Proximity to Playgrounds
- Distance to the town centre and/or local centre
- Whether the site is a Greenfield or Brownfield site.

A total of 78 sites were allocated for development on the basis of their Sustainability Score; these were then verified for suitability against the sequential test. The Sustainability Appraisal presented by HBC is considered to be suitable assessment of the wider sustainability benefits to satisfy the consideration of other factors prescribed in both the Sequential and Exception tests as detailed in NPPF and the Hastings SFRA.

Excluded Sites in Flood Zone 3a

Table 3 details the 8 excluded sites partially or completely within Flood Zone 3a considered in the Sustainability Appraisal process, which was conducted alongside the sequential testing for flood risk of Hastings' site allocations. Many of these sites also have areas in Flood Zone 2, however falling in Flood Zone 3a is deemed stronger grounds for exclusion. The results of the reports from the Sustainability Appraisal process, the Sequential Test and the assessment of deliverable and developable sites in the SHLAA for Hastings indicate that these sites should not be taken forward. It should be noted that other factors such as use of Greenfield space, proximity to amenities and footpaths/cycle routes and proximity to wildlife sites were additional outcomes of the sustainability appraisal that strengthened the case for exclusion of these sites over some allocated sites in areas at risk of flooding.

Excluded Sites in Flood Zone 3b

Table 4 details the excluded site within Flood Zone 3b considered in the Sustainability Appraisal process. This site also has areas in Flood Zone 2 and 3a, however falling in Flood Zone 3b is deemed stronger grounds for exclusion. The results of the reports from the Sustainability Appraisal process, the sequential test and the assessment of deliverable and developable sites in the SHLAA indicate that these sites should not be taken forward. It should be noted that other factors such as use of Greenfield space, plus proximity to amenities and footpaths/cycle routes were additional outcomes of the Sustainability Appraisal that strengthened the case for exclusion of these sites over some allocated sites in areas at risk of flooding.

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Table 3 – Sites Excluded in Flood Zone 3a

Site Ref	Site Name	Grid Reference		SA and Sequential Test Results
		E	N	
N06	Hastings Garden Centre, Bexhill Road	576996	108410	<p>Site almost completely located within Flood Zone 3a so should be considered as currently undevelopable and excluded from the Development Management Plan.</p> <p>In addition the site is over 200m from a playground and any local centre. Overall the site has a low sustainability score.</p>
B41	Tilekiln Farm, Fairlight Avenue	584066	111263	<p>This is a Greenfield site, as reported in the SA and the SHLAA.</p> <p>In addition, the site is over 200m from a cycle route and footpath. Overall the site has a low sustainability score. The site also has an area of Flood Zone 3a running through it and has deep surface water flood risk. On these grounds it should be considered as currently undevelopable and excluded from the Development Management Plan.</p>
C12	Land at Church Wood Drive	578114	111175	<p>The site is covered by a Local Nature Reserve and Ancient Woodland; it is a Greenfield site. In addition the site is over 200m from the district or local centre, as reported in the SA and SHLAA. Overall the site has a low sustainability score. The site also has an area of Flood Zone 3a within it. On these grounds it</p>

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				should be considered as currently undevelopable and excluded from the Development Management Plan.
C15	Land East of Holmhurst St Mary	580415	112592	This site is within a Local Wildlife Site and is a Greenfield site. In addition the site is over 200m from a cycle route and any local centre as reported in the SA and SHLAA. Overall the site has a low sustainability score. The site also has an area of Flood Zone 3a within it. On these grounds it should be considered as currently undevelopable and excluded from the Development Management Plan.
B01	Bulverhythe Development Area	577593	108575	Site completely located within Flood Zone 3a so should be considered as currently undevelopable and excluded from the Development Management Plan. The site is also close to Local Wildlife Site. The site is over 200m from a footpath, local centre and playground. Overall the site has a low sustainability score.
B29	Land at Queens Road	581949	109944	The site is over 200m from a cycle route, local centre and playground, as reported in the SA and SHLAA. Overall the site has a low sustainability score. The site also has an area of Flood Zone 3a within it. On these grounds it should be considered as currently undevelopable and excluded from the Development Management Plan

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B16	Land at Breadsell Lane	578014	112864	<p>The site is also a Greenfield site and in close proximity to a SSSI, Local Wildlife Site and has a potential significant impact on the High Weald Area of Outstanding Natural Beauty (AONB), as reported in the SA and SHLAA. Overall the site has a low sustainability score. The site also has an area of Flood Zone 3a within it, and has deep surface water flood risk. On these grounds it should be considered as currently undevelopable and excluded from the Development Management Plan</p>
A35	17 Bulverhythe Road	578272	108742	<p>Site completely located within Flood Zone 3a so should be considered as currently undevelopable and excluded from the Development Management Plan.</p> <p>Site is also a great distance from amenities/local centre, as reported in the SA and SHLAA. Overall the site has a low sustainability score.</p>

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Table 4 – Excluded sites in Flood Zone 3b

Site Ref	Site Name	Grid Reference		SA and Sequential Test Results
		E	N	
C19	Land Rear of 16-56 (Evens) Ironlatch Avenue and Gillsmans Drive	578986	110576	<p>The site is a Greenfield site and located in or adjacent Local Wildlife Site, as reported in the SA and SHLAA.</p> <p>In addition the site is over 200m from a cycle route and any local centre. Overall the site has a low sustainability score. The site also has an area of Flood Zone 3b within it, and is susceptible to deep surface flooding. On these grounds it should be considered as currently undevelopable and excluded from the Development Management Plan.</p>

Capabilities on project:
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Sequential Test Outcomes

Presentation of Outcomes

Following exclusion of sites through the Sustainability Appraisal process, the sequential test has been applied to sites proposed for allocation in the Development Management Plan.

The flood risk information gathered from the various sources has been detailed in a Sequential Test Table (refer to Appendix B) for the allocated sites, which enables easy identification of potential development sites prone to flood risk issues and identifies requirements for further assessment (i.e. with a site profile), as required.

The need for further assessment is recorded in the sequential test table by a simple question: *Is a site profile required to determine whether the exception test is required?*

N	Site is entirely within Flood Zone 1. Principle of proposed development has passed the sequential test and is therefore deemed acceptable.
Y	Site has areas in Flood Zones 2, 3a or 3b. Proposed development has not yet passed the sequential test and there is a need to consider whether the exception test needs to be implemented through a site profile. The site can still be deemed suitable for the proposed development should it pass further stages of the sequential and exception tests.

This Sequential Test Table provided in Appendix B features all of the 78 allocated sites analysed for their overall flood risk vulnerability. Of the 78 sites allocated by their sustainability appraisal score, 8 sites were screened as requiring site profiles falling in Flood Zones 2, 3a and 3b. The content of the site profiles is discussed below.

Site Profiles

For each individual site, it was decided based on previous experience and in discussion with HBC, that where 5% or greater site area was within Flood Zone 2, 3a or 3b, a site profile was produced to allow further analysis. If the land within the flood zone is less than 5% the site should automatically 'pass' the sequential test with the 'proviso' that development would need to be strategically located to the areas of lowest risk i.e. Flood Zone 1.

Creating a site profile for any development sites situated partially or fully within Flood Zone 2, 3a or 3b allowed for the possibility to clarify the extent of the flood zone and consider whether the development is suitable in accordance with Tables 1 and 2 (transcribed from NPPF technical guidance). Site profiles were created for the 8 sites found to intersect Flood Zones 2/3a/3b from the GIS analysis. The site profiles for these 8 development sites can be found in the Appendix C.

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In considering the appropriateness of development on a site, consideration of whether the proposed allocation could be met through intensification of development on other sites was a due consideration. For the three sites warranting this consideration (FB2, FB3 and FB6) all were found to be in the key regeneration area of the West Marina, which in accordance with the Local Plan, it is desirable to regenerate to stimulate tourism and economic growth in Hastings. These factors carry strong weighting in the Sustainability Appraisal. Intensification of development was therefore not deemed to be suitable.

While conducting the site profiles, it was determined that half of the sites would require the use of the Exception Test as residential development is proposed with significant areas of the site within Flood Zone 3a. While undertaking the Exception Test, it was determined that all of the development sites had been chosen on the basis of their Sustainability Appraisal score and therefore, were in line with the wider sustainability objectives of the Council. Therefore they would subsequently pass the Exception Test, with the stipulation that development generally, and more vulnerable development particularly, shall be directed away from the higher flood risk section of the sites.

Further criteria for satisfying the exception test involved consideration of the reasons from the sustainability appraisal that the sites were originally selected over others in lower risk zones; but also the requirements in masterplanning to ensure the site is safe in the event of a flood i.e:

- Provision of safe means of access and egress in the event of a flood; and
- Emergency procedures to be developed for the sites that allowed for evacuation following receipt of a flood warning.

Furthermore site-specific flood risk assessments (FRA's) on these sites would need to consider the impact of climate change on the development throughout its lifetime and ensure that the resultant development does not increase flood risk to other sites.

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3. Conclusions

The following conclusions were made from the sequential testing process:

- From the 138 potential sites identified in the Sustainability Appraisal, HBC found that 78 sites were found achieve the highest scores and should be allocated, subject to the Sequential Test.
- **Is the Sequential Test methodology chosen compliant with planning policy?** Yes, the method employed which was taken from the Hastings SFRA was developed to comply with PPS25 and has been verified against NPPF.
- **Have the wider sustainability benefits been considered?** Yes. The Sustainability Appraisal details a quantitative means of assessment for this and is deemed to satisfy this requirement with regards to the Sequential Test.
- **Of the 138 potential sites can all development be allocated in Flood Zone 1, based on proposed allocations?** Technically yes, but not in keeping with the wider sustainability requirements of the Hastings Local Plan; therefore no. Of the 78 sites chosen, 8 sites intersect with flood zones 2/3a/3b. 70 sites fall solely in Flood Zone 1.
- **Would intensification of development on allocated Flood Zone 1 sites provide the additional allocation required?** Feasible for some of these sites but would not meet the wider sustainability requirements and objectives of the Hastings Local Plan.
- **Of the sites intersecting flood zones 2/3a/3b can development take place outside of the flood zones?** Yes for 5 of the sites, feasibly. The majority of these sites have just a small land area at risk of flooding. Access and egress requirements will need to be located away from the areas of flood risk.
- **For the remaining sites, can the required development be accommodated safely within the site (meeting the requirements of the Exception Test)?** Yes, the Exception Test can be passed for all 3 sites (refer to site profiles – Appendix C).

Based on the above statements, the site allocations in the Development Management Plan have passed the Sequential Test in compliance with NPPF. Recommendations of the individual site profiles should be provided for developers wishing to develop those sites, as there are specific provisions that will need to be satisfied by the developer under the exception test, which they should be made aware of at an early stage.

Furthermore it is recommended that this document is considered as a live document that should be updated following any notable change in the proposed development plan (e.g. following a large windfall site becoming

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available) and that it should be kept up to date with revisions to flood mapping provided by the EA, with changes to other influencing documents (such as the Shoreline Management Plan) and in a suitable timescale with consideration for the effects of climate change in the future.

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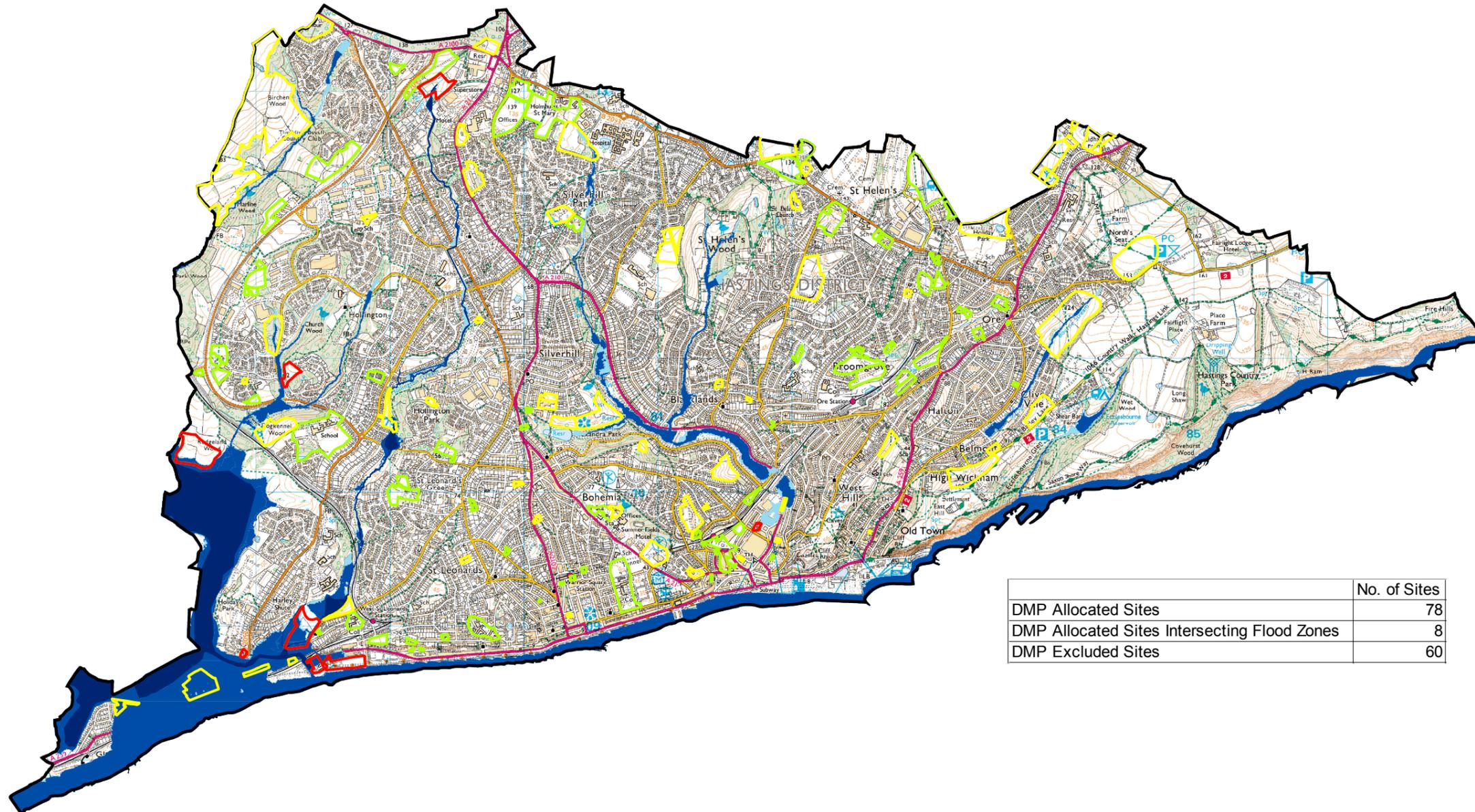
4. Appendices

Capabilities on project:
Water

Appendix A – Area Overview Map

Legend:

-  Borough Boundary
-  DMP Allocated Sites
-  DMP Allocated Sites Intersecting Flood Zones
-  DMP Excluded Sites
-  Flood Zone 2 (Source: EA, 2012)
-  Flood Zone 3a (Source: EA, 2012)
-  Flood Zone 3b - Functional Floodplain (Source: Hastings SFRA, 2008)



	No. of Sites
DMP Allocated Sites	78
DMP Allocated Sites Intersecting Flood Zones	8
DMP Excluded Sites	60



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Metres

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Ordnance Survey [100021328]. This map is indicative only and has no legal status

Issue	Description	Chkd	Appd	Date
B	Final Issue	JM	CD	18/12/12
A	Draft for review	JM	CD	07/12/12



Project Name: Hastings Sequential Testing of Site Allocations

Map Title: Appendix A - Site Allocations and Flood Risk Zones

Map Number:	Scale:	Sheet Size:	Rev:
60279432/01	NTS	A3	B

Capabilities on project:
Water

Appendix B – Sequential Test Analysis

Hastings Local Plan
Development Management Plan
Sequential Testing of Site Allocations
Appendix B - Sequential Test Analysis

DMP Site Reference	SA Site Reference	Site Name	Area (ha)	Grid Reference		Potential Uses	Flood Zone Classification				Potential or Historic Flood Issues (Y/N)	NPPF Vulnerability Classification	Site Profile Required (Y/N)	Comments
				E	N		1	2	3a	3b				
CLB1	B12	1-3 Chapel Park Road	0.130	580449	109423	Residential	*	*	*	*	N	More Vulnerable	N	Site requires that heritage policies are referred to. Site adjacent to conservation area, registered park or garden.
CLB2	A20	Taxi Office/B.R. Social Club, St John's Road	0.120	580365	109362	Residential	*	*	*	*	Y	More Vulnerable	N	Site is within conservation area. Flood hotspot
CLB3	D08	Sorting Office Site, Kings Road	0.050	580285	109320	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission
CLB4	D14	4-5 Stockleigh Road	0.030	580118	109191	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission
CLB5	B31	College of Holy Child Jesus, Magdalen Rd	4.930	580742	109306	Residential	*	*	*	*	Y	More Vulnerable	N	The site has its own policy, enabling development. Heritage issues are considered as a priority. Some deep surface water flood risk
CV01, CV03, CV04	A01	Upper Ore Valley				Residential	*	*	*	*	N	More Vulnerable	N	the site is split into three sites, one has planning position for 51 units. The other two sites have the potential for 16 houses.
CV03	A30	Rear of Old London Road	0.460	583395	111189	Residential	*	*	*	*	N	More Vulnerable	N	N/A
CV05	D35	309-311 Harold Road	0.090	583672	110808	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreements
CV06	D26	Hare & Hounds, 391 Old London Road	0.000	583615	111266	Residential	*	*	*	*	N	More Vulnerable	N	N/A
CVO2	A24	Land west of Frederick Road	0.800	583101	111571	Residential	*	*	*	*	N	More Vulnerable	N	Site already has planning permission
FB1	N03	The Grove School	9.400	578478	110420	Residential	*	*	*	*	Y	More Vulnerable	N	Site adjacent to Local Wildlife Site and SSSI. Site is within area of deep surface water flood risk. Development require provision of SuDS
FB11	N02	Land South of Crowhurst Road	0.080	577577	110894	Other identifiable sites	*	*	*	*	N		N	Proximity to SSSI. Site is contained within or adjacent to Local Wildlife Site. Greenfield site. Development must consider ecological issues.
FB12	D43	St Ethelburga's Church Hall	5.450	577552	110304	Potential Area of Search/Wind Turbines	*	✓	✓	*	N	Essential Infrastructure	Y	Site already has planning permission. Sequential testing required
FB2	A29	West St. Leonards Primary School	3.920	578341	108963	Residential and Commercial	*	✓	✓	*	Y	More Vulnerable	Y	Sequential Testing Required
FB3	A16	Seaside Road, West St Leonards	2.22	578667	108726	Residential and Commercial	*	*	✓	*	N	More Vulnerable	Y	Sequential Testing Required
FB4	B04	Former Westerleigh School	2.15	579098	110083	Residential	*	*	*	*	Y	More Vulnerable	N	Site requires SuDS to address shallow surface water flood risk. Green space is also required as part of the design brief
FB5	B14	Former HCAT St Saviours Road	1.05	578732	109037	Residential	*	*	*	*	N	More Vulnerable	N	Site already has planning permission.
FB6	B13	Cinque Ports Way former Stamco Timber Yard and TA Centre	0.89	578451	108714	Residential and Commercial	*	✓	✓	*	N	More Vulnerable	Y	Sequential Testing Required
FB7	A05	Malmesbury House, West Hill Road	0.70	578920	108899	Residential	*	*	*	*	N	More Vulnerable	N	Local Wildlife Site in or next to site. Site is also in a conservation area or registered park
FB8	B03	Former Westerleigh School Playing fields	0.56	579098	110083	Residential	*	*	*	*	N	More Vulnerable	N	Site already has planning permission subject to legal agreement
FB9	D34	190 Bexhill Road	0.19	577906	108797	Residential	*	✓	*	*	N	More Vulnerable	Y	Site already has planning permission. Sequential testing required
GH1	A27	Robsack A, Churchwood Drive	1.24	578251	110893	Residential	*	✓	*	*	N	More Vulnerable	Y	Sequential Testing Required
GH10	E05	Site RX2, Sydney Little Road, Churchfields	0.22	578034	111699	Employment	*	*	*	*	N		N	Greenfield site
GH11	E07	NX3 Sydney Little Road, Churchfields	0.17	577929	111504	Employment	*	*	*	*	N		N	Greenfield site.
GH2	A04	Mayfield E, Bodiam Drive	1.10	577734	111044	Residential	*	*	*	*	N	More Vulnerable	N	SSSI proximity, not an issue. Greenfield site
GH3	B15	Spyways School, Gillsmans Hill	1.09	579418	110313	Residential	*	*	*	*	N	More Vulnerable	N	Site already has planning permission subject to legal agreement
GH4	A26	Mayfield J, Mayfield Lane	0.77	577733	110877	Residential	*	*	*	*	N	More Vulnerable	N	Greenfield site. Proximity to SSSI. Site already has planning permission subject to legal agreement
GH5	A11	Land at Redgeland Rise (Wishing Tree Nursery)	0.71	578895	110870	Residential	*	*	*	*	N	More Vulnerable	N	Planning permission already granted subject to legal agreement
GH6	A22	Mayfield Farm	0.54	577697	110991	Residential	*	*	*	*	N	More Vulnerable	N	SSSI proximity, has been taken into account.
GH7	D56	Land south of 12-17 Catsfield Close	0.41	577984	110690	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreements. Greenfield site.
GH8	E06	Sites PX and QX Churchfields	1.61	578004	111594	Employment	*	*	*	*	N		N	Greenfield site. Development must include reference of ecology and tree protection issues.
GH9	E08	NX2 Sydney Little Road, Churchfields	0.32	577980	111506	Employment	*	*	*	*	N		N	Greenfield site. Development must include reference of ecology and tree protection issues.
HOV1	A23	Former Stills Factory Ore Valley	2.71	582475	110955	Residential	*	*	*	*	N	More Vulnerable	N	Local Wildlife Site adjacent to site. Development need to take account of potential ecology issues.
HOV11	E10	Ivyhouse Lane, Northern Extension	5.84	582986	112328	Employment	*	*	*	*	Y		N	Requirement of SuDS and landscape and ecological issues. Greenfield site.
HOV12	C26	5-15 (odds) Fellows Road	0.51	582510	111074	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreements
HOV12	E11	Land East of Burgess Road, Ivyhouse	0.51	583185	112108	Employment	*	*	*	*	Y		N	Requirement of SuDS and landscape and ecological issues. Greenfield site.
HOV2	A18	Ore Valley	2.35	582574	110882	Residential	*	*	*	*	Y	More Vulnerable	N	Site is adjacent to Local Wildlife Site. Deep Surface flooding
HOV3	A02	Mount Pleasant Hospital, Frederick Road (Former Ore Valley Millennium Communities)	1.84	583028	111014	Residential	*	*	*	*	N	More Vulnerable	N	Brownfield site
HOV4	B08	The Cheviots/Cotswold Close	1.23	582994	111565	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission.
HOV5	B09	87-221 (Odds) Farley Bank	0.73	582849	110804	Residential	*	*	*	*	N	More Vulnerable	N	The site already had planning permission
HOV6	D57	Ore Business Park, Farley Bank	0.70	582834	110860	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreements

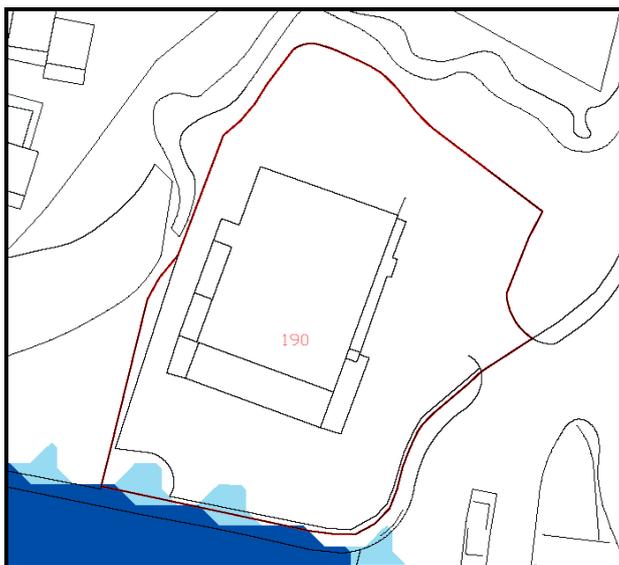
Hastings Local Plan
Development Management Plan
Sequential Testing of Site Allocations
Appendix B - Sequential Test Analysis

DMP Site Reference	SA Site Reference	Site Name	Area (ha)	Grid Reference		Potential Uses	Flood Zone Classification				Potential or Historic Flood Issues (Y/N)	NPPF Vulnerability Classification	Site Profile Required (Y/N)	Comments
				E	N		1	2	3a	3b				
HOV7	B49	Upper Broomgrove Road	0.28	582728	111084	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission
HOV8	C05	2-20(evens) Fellows Road	0.27	582483	111047	Residential	*	*	*	*	N	More Vulnerable	N	The site already had planning permission subject to legal agreement
HOV9	D28	107 The Ridge (Simes & Sons)	0.22	583071	111746	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission.
HTC1	A14	Hastings Station Yard (Part)	0.44	581605	109716	Residential	*	*	*	*	N	More Vulnerable	N	Site already has planning permission
HTC2	A43	Cornwallis Street Car Park	0.22	581741	109743	Residential	*	✓	*	*	Y	More Vulnerable	Y	Sequential Testing Required
HTC3	A15	The Observer Building (part)	0.07	581401	109361	Residential	*	*	*	*	N	More Vulnerable	N	Site is within conservation area or registered park or garden
HTC4	D50	40 & 41 Wellington Square	0.02	581847	109505	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission. The site is within a conservation area, registered park or gardens.
HTC5	D52	36 & 37 Wellington Square	0.02	581861	109525	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission. The site is within a conservation area, registered park or gardens.
HTC6	E12	Priory Quarter	2.60	581483	109555	Employment	*	*	*	*	Y		N	Heritage and surface water flood risk need to be addressed with development. ANA covered half the site
LRA1	A31	Holmhurst St Mary	6.98	580199	112835	Residential	*	*	*	*	Y	More Vulnerable	N	Deep surface flooding risk. Greenfield site. Local Wildlife Site located in the site. Additional shops required with development
LRA2	N01	Harrow Lane Playing Fields	4.75	579887	112817	Residential	*	*	*	*	N	More Vulnerable	N	Greenfield site.
LRA3	C08	Land adj to 777 The Ridge	1.86	579975	113004	Residential	*	*	*	*	N	More Vulnerable	N	ANA covers most of the site. Landscape and ecological issues mentioned on this site. Open space required within the development
LRA4	C03	Old Roar House, Old Roar Road	0.84	580386	112014	Residential	*	*	*	*	N	More Vulnerable	N	Site is adjacent to Alexandra Park.
LRA5	D49	Former Workplace Health & Fitness Centre, The Ridge West	0.47	579046	113171	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission.
LRA6	E02	Queensway North, Queensway	4.70	578568	112460	Employment	*	*	*	*	Y		N	Site development must refer to ecology and surface water flood risk issues. Greenfield site within are of deep surface water flood risk. Site has a close proximity to SSSI
LRA7	NE01	Land at junction of The Ridge West and Queensway	3.37	579322	113153	Employment	*	*	*	*	N		N	Developemnt need to take into account the ecology issues. Greenfield site. ANA covers some of the site.
LRA8	E01	Land in Whitworth Road	2.51	579347	113035	Employment, B1	*	*	✓	✓	N	Less Vulnerable	Y	Sequential Testing Required. Ecology, archaeological remains and surface water flood risk need to be considered with new build. Greenfield site
LRA9	E03	Marline Fields, Enviro21 Business Park, Land West of Queensway	1.48	578124	112069	Employment	*	*	*	*	Y		N	Site development must refer to ecology and surface water flood risk issues. Greenfield site within are of deep surface water flood risk. Site has a close proximity to SSSI
MBL1	B02	Former Hastings College Archery Road	2.22	579686	108982	Residential	*	*	*	*	N	More Vulnerable	N	Site is within a registered park or garden. Site needs to be in accordance with heritage policies.
MBL2	D53	37 Charles Road West, Filsham Nurseries	0.26	579622	109904	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreements
MBL3	A32	Gambier House, West Hill Road	0.23	579158	108885	Residential	*	*	*	*	N	More Vulnerable	N	Adjacent to Local Wildlife Site. Heritage policies are considered with allocation of details.
MBL4	B24	West Hill Road Reservoir	0.19	579411	108919	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission
MBL5	D21	27 Dane Road	0.14	579873	109561	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission
MBL6	D18	49-52 Caves Road	0.06	579236	108829	Residential	*	*	*	*	N	More Vulnerable	N	Site development must have refernece to heritage and ecological requirements. The site is within a conservation area, registered park or gardens. Site is also contained within or adjacent to Local Wildlife Site
MBL7	D51	36-40 Caves Road	0.04	579164	108822	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission. The site is within a conservation area, registered park or gardens.
SAP1	C04	Horntye Park	1.01	580586	109859	Residential	*	*	*	*	Y	More Vulnerable	N	Shallow surface water flood risk area. The site already had planning permission subject to legal agreement
SAP2	A33	Hollingsworth Garage, Braybrooke Road	0.40	581696	109963	Residential	*	*	*	*	N	More Vulnerable	N	N/A
SAP3	A19	12-19 Braybrooke Terrace	0.23	581292	109687	Residential	*	*	*	*	Y	More Vulnerable	N	Deep surface flooding
SAP4	D32	347-349 London Road	0.15	580001	110488	Residential	*	*	*	*	N	More Vulnerable	N	This site is subjected to a lapsed planning permission in a residential area.
SAP5	D30	Silver Springs Medical Practice Beaufort Road	0.12	580038	110618	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission.
SAP6	D20	The Langham Hotel, 16 Elphinstone Road	0.05	581857	110506	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission
SH1	N04	Land adjacent to Sandrock Park	3.32	581951	112428		*	*	*	*	N	More Vulnerable	N	Greenfield site. Informal play and recreation is required for development to occur. ANA covered the site. Site is within proximity to SSSI.
SH2	A28	Land at Osborne House, The Ridge	2.97	582299	112047	Residential	*	*	*	*	N	More Vulnerable	N	Site already has planning permission but subjected to legal agreement
SH3	A21	Hurst Court, The Ridge	1.44	582104	112549	Residential	*	*	*	*	N	More Vulnerable	N	Proposed 30 dwellings, informal play areas and recreation. ANA covers site.
SH4	C02	Mount Denys, Pinehill & Ridgeway	0.64	582704	111879	Residential	*	*	*	*	N	More Vulnerable	N	Site requires retention of green space. ANA covers a large section of the site.
SH5	A47	Rear of Linley Drive	0.00	582052	111031	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreement.
SH6	D41	195 The Ridge	5.45	582639	111928	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission.
SH7	D40	191 The Ridge	0.15	582663	111914	Residential	*	*	*	*	N	More Vulnerable	N	The site already has planning permission subject to legal agreements

Capabilities on project:
Water

Appendix C – Site Profiles

Capabilities on project:
Water



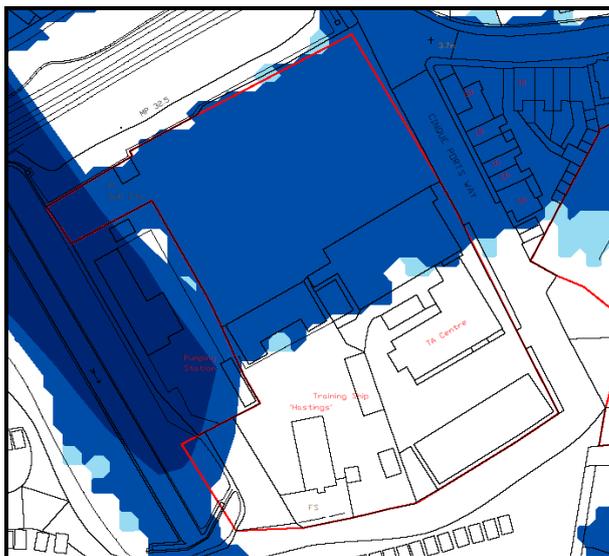
Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

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190 Bexhill Road						
Site Reference	FB9- 190 Bexhill Road					
Area (Focus Area)	Focus Area 3: Filsham Valley and Bulverhythe					
Size	0.19 ha					
Potential Uses	Residential					
NPPF Vulnerability Classification	More Vulnerable					
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a	✓					
Flood Zone 3b	✓					
Potential or Historic Flood Issues	No reported issues					
Exception Test Required	No					
Key Requirements For Satisfying Sequential and Exception Test	Due to the extent of flooding it should be possible for no buildings to be provided within the Flood Zone3a/3b areas on this site. SUDS would be recommended and safe access and egress provisions from site should avoid the flood outline and will be required in the site-specific FRA.					
Considerations of Alternatives?	Not required as only a small area of the site is in an area of flood risk which can be avoided in when developing the site. Furthermore, the site already has planning permission.					
Additional Information (from DMP and Sustainability Appraisal):	<ul style="list-style-type: none"> • The site has the potential for 32 homes on the site. • The management of surface water runoff was dealt with by condition as part of the original planning consent for the site – HS/FA/08/00405. • 190 Bexhill site already has planning permission for development, subject to a legal agreement - the number above is the original permission – the latest – HS/FA/12/00197 – is for a time extension. 					

Capabilities on project:
Water



Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

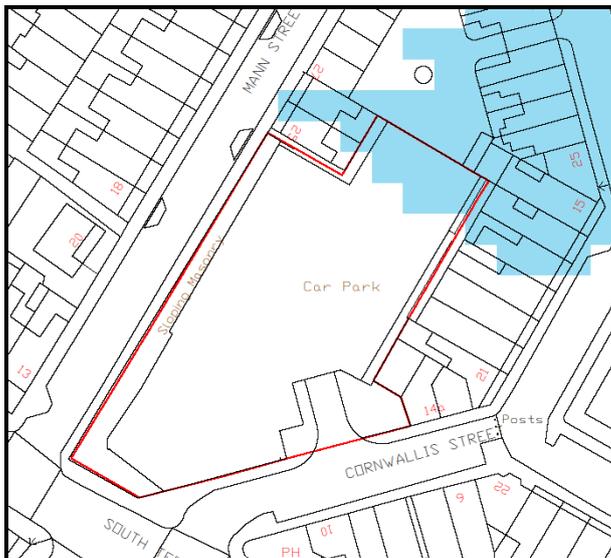
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Cinque Ports Way, Former Stamco Timber and TA Centre						
Site Reference	FB6 -Cinque Ports Way, Former Stamco Timber and TA Centre					
Area (Focus Area)	Focus Area 3: Filsham Valley and Bulverhythe					
Size	0.89ha					
Potential Uses	Residential			Commercial		
NPPF Vulnerability Classification	More Vulnerable			Less Vulnerable		
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a				✓		
Flood Zone 3b	✓					
Potential or Historic Flood Issues	No reported issues					
Exception Test Required	Yes					
Key Requirements For Satisfying Sequential and Exception Test	<p>More vulnerable land uses (e.g. residential dwellings) to be kept out of the Flood Zone 2/3 areas or on 1st floor and above (above the extreme flood level) if within Flood Zone 2/3. Basement dwellings are not permitted within the Flood Zone 2/3 areas of the site.</p> <p>Provisions of SUDS, flood-resilient construction to buildings at risk, a flood-response emergency plan and provisions for safe access and egress from site should avoid the flood outline and will be required in the site-specific FRA.</p>					
Considerations of Alternatives?						
No alternatives for this site because the land is to aid tourism and leisure in regards to the regeneration of the West Marina Area. Its seafront location is important to achieving the wider regeneration aims, which cannot be accommodated elsewhere.						
Additional Information (from DMP and Sustainability Appraisal):						
<ul style="list-style-type: none"> • This site, FB6 should be considered alongside FB3 as part of the wider “West Marina” development. 						

Capabilities on project:
Water

- Potential for 54 residential units as part of mix commercial and residential uses. Flatted development is acceptable, so residential units can and should be restricted to the first floor of development.
- Any development proposed on this site, will need to include flood resistant design and innovate solutions to the risk identified. Contributions to sea defences may also be required as stated in the Development Management Plan.
- The Public Right of Way and National Cycle Route run along the southern boundary and must remain.
- The Local Wildlife Site adjacent to the site, on the western edge must have a potential landscape buffer in agreement with policy EN3.
- In accordance with policy SC7, migration measures must be included in any scheme such as Sustainable Drainage Systems.
- The distance to amenity footpath will be considered as part of the wider green infrastructure network.
- Deep surface water flood risk only affects land just on the northern border of the site, and will be considered as part of the wider flood risk issues.

Capabilities on project:
Water



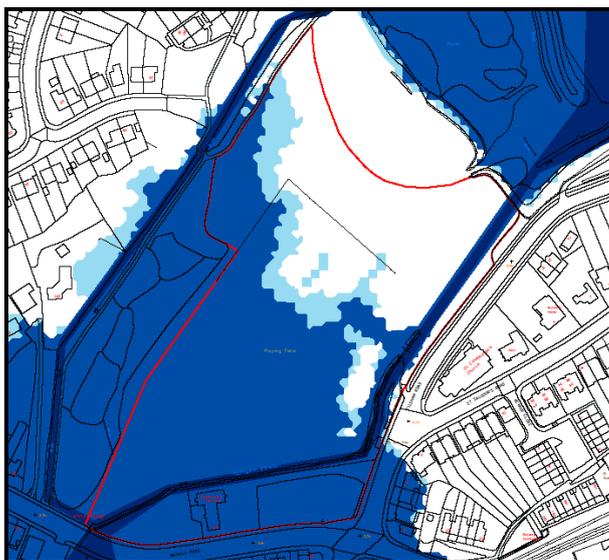
Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

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Cornwallis Street Car Park						
Site Reference	HTC2 – Cornwallis Street Car Park					
Area (Focus Area)	Focus Area 8: Hastings Town Centre					
Size	0.22ha					
Potential Uses	Residential					
NPPF Vulnerability Classification	More Vulnerable					
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a	✓					
Flood Zone 3b	✓					
Potential or Historic Flood Issues	Reported historic flooding.					
Exception Test Required	No					
Key Requirements For Satisfying Sequential and Exception Test	<p>More vulnerable land uses (e.g. residential dwellings) to be kept out of the Flood Zone 2/3 areas or on 1st floor and above (above the extreme flood level) if within Flood Zone 2/3. Basement dwellings are not permitted within the Flood Zone 2/3 areas of the site.</p> <p>Provisions of SUDS, flood-resilient construction to buildings at risk, a flood-response emergency plan and provisions for safe access and egress from site should avoid the flood outline and will be required in the site-specific FRA.</p>					
Considerations of Alternatives?	<p>This site has been a long term allocation, and whilst 10 homes could be allocated elsewhere in the borough, the SHLAA has shown this as being one of the most suitable for development, due to its proximity to the green infrastructure network and being part of town centre renewal. Furthermore the site has sufficient space such that it can be developed in a way in which residential units are not within Flood Zone 2.</p>					

Capabilities on project:
Water



Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

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Former West St Leonards Primary School						
Site Reference	FB2 - Former West St Leonards Primary School					
Area (Focus Area)	Focus Area 3: Filsham Valley and Bulverhythe					
Size	3.92ha					
Potential Uses	Residential and Community					
NPPF Vulnerability Classification	More Vulnerable					
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a				✓		
Flood Zone 3b		✓				
Potential or Historic Flood Issues	Historic flooding indicated (from SFRA and Sustainability Appraisal)					
Exception Test Required	Yes					
Key Requirements For Satisfying Sequential and Exception Test	<p>More vulnerable land uses (e.g. residential dwellings) to be kept out of the Flood Zone 2/3 areas or on 1st floor and above (above the extreme flood level) if within Flood Zone 2/3. Basement dwellings are not permitted within the Flood Zone 2/3 areas of the site.</p> <p>Provisions of SUDS, flood-resilient construction to buildings at risk, a flood-response emergency plan and provisions for safe access and egress from site should avoid the flood outline and will be required in the site-specific FRA.</p>					
Considerations of Alternatives?	<p>There are no other sites that are suitable or have the potential to house approximately 70 homes in the western side of Hastings outside of Flood Zone 1 and Flood Zone 2. It is also desirable to regenerate the western side of Hastings as part of the wider West Marina Regeneration Area and this development would not have the desired impact if placed on the eastern side of Hastings.</p>					
Additional Information (from DMP and Sustainability Appraisal):	<ul style="list-style-type: none"> • The site has the potential for 70 homes on the site and formal open space with playing fields. Green space will also be required as part of the design brief for informal recreation to address the play requirements which should be located within the Flood Zone • Any housing on the site should be directed towards the northern part of the site, away from the Flood 					

Capabilities on project:
Water

Zone. Any community sites should be located in the southern section of the Flood Zone.

- This site also forms part of the wider 'West Marina Regeneration Area'.
- As in accordance with Policy SC7 any development must reduce surface water flood risk, Sustainable Drainage Systems (SUDS).
- The site adjoins South Saxons Local Wildlife Site (LWS) to the west and north of the site. Ecology issues will need to be mitigated against in any developments on the site.
- The original use of site was a landfill. The potential for landfill gas could be a potential hazard and should be mitigated against in the design of any development.
- Contaminated land has been identified in the northwest corner of the site and accordance with DM5 Policy any development requires an assessment of the land.
- A buffer zone should be maintained around the Hollington Stream in the southern and western parts of the site.
- Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.

Capabilities on project:
Water



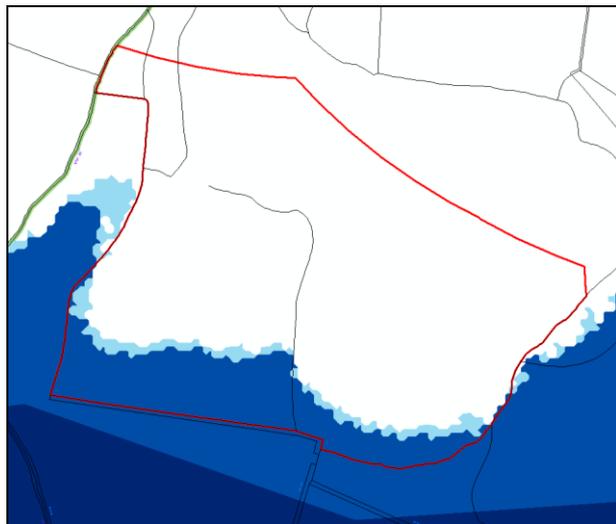
Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

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Land in Whitworth Road, The Ridge West						
Site Reference	LRA8- Land in Whitworth Road, The Ridge West					
Area (Focus Area)	Focus Area 1: Little Ridge and Ashdown					
Size	2.51 ha					
Potential Uses	Employment, B1			Residential		
NPPF Vulnerability Classification	Less Vulnerable			More Vulnerable		
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2	✓					
Flood Zone 3a		✓				
Flood Zone 3b		✓				
Potential or Historic Flood Issues	No issues reported					
Exception Test Required	No					
Key Requirements For Satisfying Sequential and Exception Test	Due to the extent of flooding it should be possible for no buildings to be provided within the Flood Zone3a/3b areas on this site. SUDS would be recommended and safe access and egress provisions from site should avoid the flood outline and will be required in the site-specific FRA.					
Considerations of Alternatives?						
Additional Information (from DMP and Sustainability Appraisal):						
<ul style="list-style-type: none"> The site had approximately 6,000m² floor space and if this land was combined with LRA7 there could be a potential 12,000m². The site is within a Local Wildlife Site and subjected to Policy EN4. Ecology and surface water flood risk issues associated with the site, as well as the potential for archaeological remains that need to be considered with new build. Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network. 						

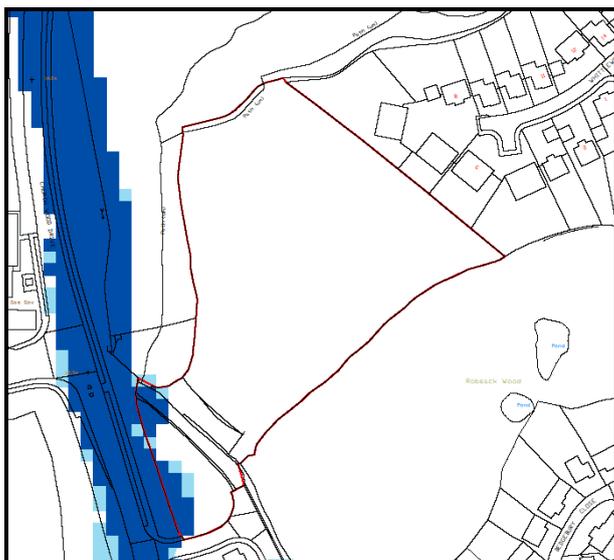
Capabilities on project:
Water



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Land South of Upper Wilting Farm						
Site Reference	FB12-Land South of Upper Wilting Farm.					
Area (Focus Area)	Focus Area 3: Filsham Valley and Bulverhythe					
Size	5.45ha					
Potential Uses	Area of search (with potential for wind turbines)					
NPPF Vulnerability Classification	Dependant on use of area. (Wind Turbines are classified as Essential Infrastructure)					
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a			✓			
Flood Zone 3b	✓					
Potential or Historic Flood Issues	No reported issue					
Exception Test Required	Dependant on development type. See below for details.					
Key Requirements For Satisfying Sequential and Exception Test	More vulnerable land uses out of the Flood Zone such as residential. Basement dwellings should not be permitted within Flood Zones 2/3 Provisions of SUDS, flood-resilient construction to buildings at risk, a flood-response emergency plan and provisions for safe access and egress from site avoiding the flood outline will be required in the site-specific FRA.					
Considerations of Alternatives?						
Alternative locations for the location of renewable energy technology were considered as part of the Renewable and Low Carbon Energy Study. The Wilting Farm/Combe Valley Countryside Park area was suggested as having the most potential taking account of windspeeds, other environmental constraints and proximity to existing buildings.						
Additional Information (from DMP and Sustainability Appraisal):						
<ul style="list-style-type: none"> • The site could be used in conjunction with Policy SC6 and the potential sites for renewable development. • The development area borders with the neighbouring council (Rother District Council) 						

Capabilities on project:
Water



Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

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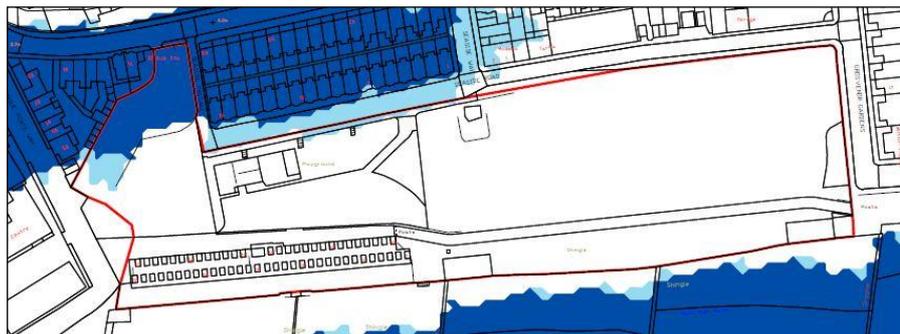
Robsack A, Church Wood Drive						
Site Reference	GH1: Robsack A, Church Wood Drive					
Area (Focus Area)	Focus Area 2: Greater Hollington					
Size	1.24ha					
Potential Uses	Residential					
NPPF Vulnerability Classification	More Vulnerable					
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a		✓				
Flood Zone 3b	✓					
Potential or Historic Flood Issues	No issues reported					
Exception Test Required	Yes					
Key Requirements For Satisfying Sequential and Exception Test	Due to the extent of flooding it should be possible for no buildings to be provided within the Flood Zone 3a/3b areas on this site. SUDS would be recommended and safe access and egress provisions from site should avoid the flood outline and will be required in the site-specific FRA.					
Considerations of Alternatives?	Not required. The area is identified as being in an area of flood risk, although part of the land allocated for development, will not form part of the developable area, this will remain as a woodland buffer between houses and the Queensway road.					

Capabilities on project:
Water

Additional Information (from DMP and Sustainability Appraisal):

- The site has the potential for 32 homes on the site.
- The site bounded by Ancient Woodland in the northwest and southeast sides of the development site. A protection area must be included with any development on this site and any ecological issues that may arise. An ecological report recommends a native woodland buffer is to be maintained around the development, supplemented in places by new trees and shrub planting.
- In addition, the Local Wildlife Site that adjoins the site would need to take account of potential impact on ecology issues, which is now referenced in the allocation details.
- Arboricultural Implications Report details recommendations for tree protection during construction.
- In accordance with Policy SC7, surface water flood risk reductions such as Sustainable Drainage Systems (SUDS) are required for the site.
- Distance to cycle routes will be considered as part of the wider green infrastructure network.
- The ANA covers part of the site, in particular, directly on the edge, so should not represent a significant constraint.

Capabilities on project:
Water



Legend:

- DMP Site Locations
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B

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Seaside Road, West St. Leonards						
Site Reference	FB3 – Seaside Road, West St. Leonards					
Area (Focus Area)	Focus Area 3: Filsham Valley and Bulverhythe					
Size	2.22ha					
Potential Uses	Residential			Commercial		
NPPF Vulnerability Classification	More Vulnerable			Less Vulnerable		
Flood Risk (% of area)	0	0-5	5-20	20-50	50-75	75-100
Flood Zone 2		✓				
Flood Zone 3a			✓			
Flood Zone 3b	✓					
Potential or Historic Flood Issues	No					
Exception Test Required	Yes					
Key Requirements For Satisfying Sequential and Exception Test	<p>More vulnerable land uses (e.g. residential dwellings) to be kept out of the Flood Zone 2/3 areas or on 1st floor and above (above the extreme flood level) if within Flood Zone 2/3. Basement dwellings are not permitted within the Flood Zone 2/3 areas of the site.</p> <p>Provisions of SUDS, flood-resilient construction to buildings at risk, a flood-response emergency plan and provisions for safe access and egress from site will be required in the site-specific FRA.</p>					
Considerations of Alternatives?	<p>This site is on the western side of Hastings and is part of the overall aim to regenerate the western area of Hastings. If this development occurred on eastern side of Hastings, the development would not have the hoped affects on the western side. In addition, accommodating 120 units elsewhere is not possible, and scheme also forms part of the wider tourism/leisure regeneration aims, for which a seafront location is essential.</p>					
Additional Information (from DMP and Sustainability Appraisal):	<ul style="list-style-type: none"> • Potential for 120 residential units as part of mix commercial, leisure and residential uses. • Underground tank in the northern part of the site which cannot be built over. • Eastern part of the site contains filled land and previous commercial users. As with Policy DM5 assessment of ground conditions and contamination will be required for all developers. • Development cannot occur till the Bexhill to Hasting Link Road construction. • Whilst the SA of this site flags up the distance from open space, the beach is close by, so is not considered a significant issue. • Both the ANA and the Surface Water flood risk area data only clip outer edge of site boundary, so do not require amendments to the allocation details. • Distance to amenity footpath will be considered as part of the wider green infrastructure network. 					