



Exception Test (Flood Risk) 2026

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PRE-SUBMISSION VERSION

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HS2 Seaside Road, West St Leonards

Ranking: 1

Vulnerability: More Vulnerable (Dwellings), Less Vulnerable (Leisure/ Retail).

Capacity: 120

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 120 dwellings in tandem with less vulnerable uses such as retail and leisure. It is in a highly sustainable location, close to Bexhill Road retail centre and sustainable transport links, including National Cycle Route 2 which crosses the site. It is within walking distance of Mulberry St Leonards Academy.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2. The delivery of a retail/ leisure offer would serve to provide jobs to improve the local jobs density and increase the tourism and leisure share attributed to this part of the Resort Area.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Seaside Road Site lies adjacent to the seafront and is therefore at risk from tidal flooding. Additionally, the Site is at a high risk of flooding from surface water. The Site is proposed for mixed use which is classed as "More Vulnerable" and "Less Vulnerable". In accordance with the Flood Map for Planning nearly all the Site is located within Flood Zone 3 but with the majority outside of the Flood Zone 3b extent. Geological data suggests there is potential for groundwater flooding to occur at surface across a significant proportion (89.55%) of the site. There is potential for sewer flooding in close proximity to the site.

A Flood Risk Assessment should be undertaken for the site to inform further master planning for the site, which should be informed by any site-specific recommendations proposed in the SFRA Update (2026). This should include interrogation of the flood levels on site as predicted by the Combe Haven Coastal Model, and an appropriate programme of groundwater monitoring to determine the potential for groundwater flooding to occur at surface and how this may be avoided and/ or mitigated through proposal design.

The Environment Agency and ESCC (LLFA) will be the main consultees on any planning application submitted for this Site. They should be consulted through pre-application process to inform the Site layout and development design. Because Southern Water's infrastructure

crosses the site, and due to the potential of sewer flooding in the surrounding area, engagement with Southern Water should also take place at this stage.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, in the east and west of the Site with the exception of the north nest corner 'dogleg', where built development should be avoided. Development of lower vulnerability, such as shops and leisure facilities, may be directed more freely throughout the site provided it takes into account the recommendations of the SFRA (2026) and this document.

A 'dry' access/egress must be provided in the form of a route located above the 1% annual probability flood level including an allowance for climate change for all flood sources (0.5% annual probability flood level including climate change should be used for tidal flooding). As the site is surrounded by floodplain to the north and the sea to the south, such an access/egress may require an engineered solution and should be designed to also provide safe access/egress for other residents of Seaside Road occupying properties between Seaside Passage and Grosvenor Gardens.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Finished floor levels should be provided with a 600 mm freeboard above the modelled 0.5% AEP tidal flood level, including an allowance for climate change. Any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See Section 5.7 in the SFRA for specific details.

A Flood Warning and Evacuation Plan should be prepared and submitted with any application for development. This plan should consider actions occupants should take on receipt of an Environment Agency flood warning, safe access and egress routes, and are as of safe refuge within the building, above the design event (0.5% AEP including climate change). For further details refer to Level 1 SFRA. It may be necessary to provide additional or enhanced sea defences to manage flood risk from the sea for the lifetime of development.

This Site is located within the "English Channel" Flood Warning Area. It is recommended for all those within this Flood Warning Area (residential and commercial occupiers) to sign up to Flood Warning Service operated by the Environment Agency.

A preliminary Hydrogeological Risk Assessment (HyRA) should be undertaken to determine ground conditions and groundwater levels in proximity to the Site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage. Should the preliminary HyRA identify potential for impact, a full HyRA should be prepared to identify proposed mitigation measures. These may include finished floor levels above the maximum wet-season groundwater level; avoiding the use of below-ground structures, and ensuring utilities systems sit well above potential saturation zones, including battery storage, meters, circuitry and distribution boards.

Recommendation

The above weighs in favour of this site progressing as an allocation.

HS5 Former West St Leonards Primary School, Bexhill Road

Ranking: 1

Vulnerability: More Vulnerable (Dwellings)

Capacity: 50

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 50 dwellings. It is in a highly sustainable location, close to Bexhill Road retail centre, local shops and the St Leonards Medical Centre, adjacent. Bus routes to Hastings, Rye, Bexhill and Eastbourne are in close proximity to the site. It is within walking distance of Mulberry West St Leonards Primary School and Mulberry St Leonards Academy.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The delivery of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

It would also deliver improvements to the Public Right of Way (PROW) that crosses the site.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Former West St. Leonards School Site lies within close proximity to the sea and two Main Rivers, therefore is at risk from tidal and fluvial flooding. Additionally, the Site is at a high risk of flooding from surface water. The Site is proposed for residential development which is classed as "More Vulnerable". In accordance with the Flood Map for Planning, parts of the Site are located within Flood Zones 2, 3 and 3b. Flood Zone 3b extends along the eastern, southern and western Site boundaries following the Main Rivers. Flood Zone 2 and 3 have similar extents to the west and south of the Site. The majority of the north of the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

There are two Main Rivers within the vicinity of the Site, Hollington Stream which flows through the east of the Site and a Main River which flows outside of the western Site boundary. The Main Rivers confluence outside of the southern Site boundary.

The Combe Haven Coastal Model indicates that during a 0.5% AEP flood event, the south-west of the Site is at risk from tidal flooding with depths greater than 2 m predicted in some areas.

During 0.5% AEP flood events (2115), mapping indicates the flood extents increase, with a "Danger to All" Flood Hazard Rating in the south-west of the Site.

Overall, the risk of flooding to the Site is moderate with areas of high risk in the south and a low risk in the north of the Site.

As the Site is larger than 1ha and lies within Flood Zone 3a, an Exception Test and a Site-Specific Flood Risk Assessment will be required as per NPPF requirements. This should include interrogation of the flood levels on Site as predicted by the detailed hydraulic modelling of the Combe Haven Coastal Model. Additionally, updated modelling may be required to reflect the latest climate change allowances which should be discussed with the Environment Agency.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

"More Vulnerable" development is not permitted within Flood Zone 3b Functional Floodplain. A 10 m wide undeveloped buffer strip should be retained alongside a Main River and the floodplain preserved to provide flood storage function. New development within 8 m of a Main River will require a Flood Risk Activity Permit from the Environment Agency. In line with the sequential approach, development should be steered towards those areas located within Flood Zone 1 in the north of the Site, with more compatible development (such as open space) located in areas at greater risk.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Finished floor levels should be provided with a 600 mm freeboard above the modelled 0.5% AEP tidal flood level, including an allowance for climate change. Any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See the SFRA for specific details.

A Flood Warning and Evacuation Plan should be prepared and submitted with any application for development. This plan should consider actions occupants should take on receipt of an Environment Agency flood warning, safe access and egress routes, and areas of safe refuge within the building, above the design event (0.5% AEP including climate change). For further details refer to the Level 1 SFRA.

It is recommended that occupiers within existing Flood Zone 3a and 3b (residential and commercial occupiers) sign up to Flood Warning Service operated by the Environment Agency.

Safe access/egress is available for the Site along Filsham Road to the east of the Site. Access to the Site would only be available through crossing Hollington Stream. Given the west and south of the Site is surrounded by floodplain, the flood hazard around the Site should be evaluated before a detailed proposal is developed in order to determine the safest locations for access and egress to and from the Site during a flood event.

Recommendation

The above weighs in favour of this site progressing as an allocation

HS11 Cinque Ports Way

Ranking: 1

Vulnerability: More Vulnerable (Dwellings)

Capacity: 58

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 58 dwellings. It is in a highly sustainable location, close to Bexhill Road retail centre and sustainable transport links. It is within walking distance of Mulberry St Leonards Academy and local doctors surgeries.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Cinque Ports Way Site lies within close proximity to the sea, and the Combe Haven Main River flows adjacent to the Site's western perimeter. As such, the Site is at risk from tidal and fluvial flooding. Additionally, the Site is at a high risk of flooding from surface water. The Site is proposed for residential use which is classed as "More Vulnerable". In accordance with the Flood Map for Planning the Site is located within Flood Zone 3a. Geological data suggests there is potential for groundwater flooding to occur at surface. There is no predicted risk of flooding to the Site from reservoirs.

Combe Haven flows outside of the western Site boundary, from north-west to south-east. The Combe Haven Coastal Model indicates that during a 0.5% AEP flood event, there is out of bank flooding along Combe Haven with depths greater than 2 m. Within this return period depths of up to 1 m are estimated throughout the Site, with depths increasing in the east of the Site up to and including 2 m.

During 0.5% AEP flood events (2115), mapping indicates there is flooding of up to 2 m throughout the Site with areas of depths greater than 2 m in the east and west of the Site. Mapping estimates there is a "Danger to All" Flood Hazard Rating covering the whole of the Site.

Overall, the risk of flooding to the Site is high.

As the Site is larger than 1 ha and lies within Flood Zone 3a, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements. This should include interrogation of

the flood levels on Site as predicted by the detailed hydraulic modelling of the Combe Haven Coastal Model. Additionally, updated modelling may be required to reflect the latest climate change allowances which should be discussed with the Environment Agency.

Given the east and west of the Site is surrounded by floodplain and is in close proximity to the sea to the south, the flood hazard around the Site should be evaluated in order to determine the safest locations for access and egress to and from the Site during a flood event. This may require an engineered solution.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A 10 m wide undeveloped buffer strip should be retained alongside a Main River and the floodplain preserved to provide flood storage function. New development within 8 m of a Main River will require a Flood Risk Activity Permit from the Environment Agency.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. No residential floorspace or utilities systems including battery storage, meters, circuitry and distribution boards should be positioned at ground floor level to avoid saturation zones. Finished floor levels should be provided with a 600 mm freeboard above the modelled 0.5% AEP tidal flood level, including an allowance for climate change. Any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See the SFRA for specific details.

A Flood Warning and Evacuation Plan should be prepared and submitted with any application for development. This plan should consider actions occupants should take on receipt of an Environment Agency flood warning, safe access and egress routes, and are as of safe refuge within the building, above the design event (0.5% AEP including climate change). For further details refer to the Level 1 SFRA.

This Site is located within the "English Channel" Flood Warning Area. It is recommended for all those within this Flood Warning Area (residential and commercial occupiers) to sign up to Flood Warning Service operated by the Environment Agency.

A preliminary Hydrogeological Risk Assessment (HyRA) should be undertaken to determine ground conditions and groundwater levels in proximity to the Site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage. Should the preliminary HyRA identify potential for impact, a full HyRA should be prepared to identify proposed mitigation measures. These may include finished floor levels above the maximum wet-season groundwater level; avoiding the use of below-ground structures, and ensuring utilities systems sit well above potential saturation zones, including battery storage, meters, circuitry and distribution boards.

Recommendation

The above weighs in favour of this site progressing as an allocation

HS6 Ore Valley (Former Power Station)

Ranking: 4

Vulnerability: More Vulnerable (Dwellings)

Capacity: 78

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 78 dwellings. It is in a highly sustainable location, close to local shops and services and sustainable transport links including Ore Station Ashford – Brighton Marshlink line. It is within walking distance of Mulberry Baird Primary Academy, East Sussex College Group (Ore Campus) and local doctors surgeries.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Former Power Station, Ore Valley Site is proposed for residential development which is classed as "More Vulnerable". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The risk of surface water flooding mapping (RoFfSW) highlights the location of an existing pond to the south-west of the Site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the pond is predicted to fill to depths of up to 0.60 m and 1.20 m respectively. During low probability rainfall events, a surface water flow path is predicted between the pond in the south-west corner of the Site and an area of ponding outside of the south-western Site boundary, with depths of up to 0.60 m. Another surface water flow path is also predicted adjacent to the eastern perimeter along Broomgrove Road, where flows are conveyed south towards an unnamed Ordinary Watercourse.

During high probability rainfall events, the risk of surface water flood risk within the site is considered to be low although localised areas of ponding in the centre of the Site are predicted with depths of up to 0.90 m.

Mapping indicates that an unnamed Ordinary Watercourse flows through the centre of the Site. Further investigation should be undertaken to understand the extent and flood risk associated from this watercourse.

Overall, the risk of flooding to the Site is low.

As the Site is larger than 1 ha, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

Some of the Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is high.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

Given infiltration is unlikely due to the nature of the soil, subsoil and underlying strata, it is recommended to discharge surface water to the unnamed Ordinary Watercourse which flows adjacent to the southern Site boundary following attenuation.

It is predicted that large volumes of surface water would be stored in the south-western area of the Site during a flood event and therefore the development should be designed around this pond to avoid displacing flood risk elsewhere. The development design could utilise this existing pond as an integrated water management feature which would provide amenity, biodiversity and water quality benefits.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

An Ordinary Watercourse runs through the centre of the Site and outside of the southern Site boundary and a minimum 5 m wide undeveloped buffer strip must be maintained along all reaches. ESCC sets out in their "Guidance for Application for Ordinary Watercourse Consent" document which works in the vicinity of the Ordinary Watercourses are permitted and which need their consent. Where consent is required, this should be discussed with ESCC prior to submission of a planning application.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, to the east of the Site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Maintaining the eastern boundary levels between Broomgrove Road and the Site will ensure that flow will not be diverted onto the Site from the road during flood events.

Safe access/egress is available for the Site, along Firtree Road via Parker Road to access the west of the Site or along Logie Bard Way or Fellows Road via Parker Road to access the north-east or east of the Site.

Recommendation

The above weighs in favour of this site progressing as an allocation

HS18 Land at Tilekiln Farm

Ranking: 1

Vulnerability: More Vulnerable (Dwellings); Water-Compatible (Open Space and Equipped Play Facilities).

Capacity: 75

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in a scheme that is capable of delivering 75 dwellings. It is in close proximity to the Ore Village Local Centre and sustainable transport routes to Hastings and Rye. It is within walking distance of Ore Village Primary Academy and Nursery and Mulberry Hastings Academy.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 40% affordable homes, in line with Policy SP2. The site would additionally be expected to introduce new areas of publicly accessible open space (a minimum of 2.09ha) and opportunities for equipped play in an area (Clive Vale/ Ore (Batchelor's Bump)) with wider deficiencies in access to equipped play and open space.

The delivery of the site is also expected to deliver onsite green and blue infrastructure and biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

It would also deliver improvements to the Public Right of Way (PROW) that crosses the site.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

Land at Tilekiln Lane is bound by the Bourne Stream ordinary watercourse at its southern boundary. In accordance with the Flood Map for Planning, the site is located in Flood Zone 1, Flood Zone 3a (2.56%) and a small area of Flood Zone 3b (2.19%) along the line of the stream. The Site is proposed for mixed use which is classed as "More Vulnerable". Geological data suggests there is potential for groundwater flooding to occur at surface across slightly less than half (45.72%) of the site. There is potential for sewer flooding in close proximity to the site. There is limited potential for surface water flooding. There is no predicted risk of flooding to the Site from reservoirs.

The section of the Bourne Stream Ordinary Watercourse within the site currently accepts discharges from surface water sewers at higher elevations in the Ore locality. There is a surface water flow pathway running north-south through the approximate centre of the site, following the steep site topography where flows are conveyed south towards the Bourne Stream Ordinary Watercourse. There is some surface water flood risk conveyed east-west along the line of the Bourne Stream Ordinary Watercourse, overlapping with Flood Zone 3. Surface water is also capable of collecting in an existing pond within the site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the pond is predicted

to fill to depths of up to 0.30 m and 0.60 m respectively. During high probability rainfall events, the risk of surface water flood risk within the site is considered to be low.

Overall, the risk of flooding to the Site is low.

A Flood Risk Assessment should be undertaken for the site to inform further scheme planning for the site, which should be informed by any site-specific recommendations proposed in the SFRA Update (2026). This should include interrogation of the flood levels on site, and an appropriate programme of groundwater monitoring to determine the potential for groundwater flooding to occur at surface and how this may be avoided and/ or mitigated through proposal design.

The Environment Agency and ESCC (LLFA) will be the main consultees on any planning application submitted for this Site. They should be consulted through pre-application process to inform the Site layout and development design. Due to the presence of surface water sewer discharges and the limited potential for sewer flooding in the surrounding area, engagement with Southern Water should also take place at this stage.

The Bourne Stream Ordinary Watercourse runs along the southern boundary of the Site and a minimum 5 m wide undeveloped buffer strip must be maintained along all reaches, preferentially to 10 m. ESCC sets out in their "Guidance for Application for Ordinary Watercourse Consent" document which works in the vicinity of the Ordinary Watercourses are permitted and which need their consent. Where consent is required, this should be discussed with ESCC prior to submission of a planning application.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, within the north western part of the Site. Water-compatible development, such as open space and play facilities, may be directed more freely throughout the site provided it takes into account the recommendations of the SFRA (2026) and this document.

A 'dry' access/egress must be provided in the form of a route located above the 1% annual probability flood level including an allowance for climate change for all flood sources (0.5% annual probability flood level including climate change should be used for fluvial flooding). There are no obvious barriers to the delivery of such access/egress.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall- particularly through reducing the volume and velocity of water entering the Bourne Stream during periods of heavy rainfall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk, including that arising from existing surface water sewer discharges into the Stream. The development design could utilise the existing pond as an integrated water management feature which would provide amenity, biodiversity and water quality benefits.

Given the Site is greenfield, development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates to greenfield rates for all events up to and including the 1% AEP flood event with an allowance for climate change.

At the quantum of development proposed, it is not anticipated that there should be any loss of flood storage capacity within the floodplain, and proposals should seek to ensure that capacity is retained. Should this not be possible, any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site. Maintaining the existing boundary levels between Fairlight

Road, Tilekiln Lane, Fairlight Avenue and the Site will ensure that flow will not be diverted onto the Site from the road during flood events.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See the Level 1 SFRA for specific details.

Safe access/ egress to the site is available from Fairlight Road

A preliminary Hydrogeological Risk Assessment (HyRA) should be undertaken to determine ground conditions and groundwater levels both within and in proximity to the Site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage, and to provide a more detailed understanding of where within the site groundwater flooding is most likely to occur. Should the preliminary HyRA identify potential for impact, a full HyRA should be prepared to identify proposed mitigation measures. These may include finished floor levels above the maximum wet-season groundwater level; avoiding the use of below-ground structures, and ensuring utilities systems sit well above potential saturation zones, including battery storage, meters, circuitry and distribution boards.

Recommendation

The above weighs in favour of this site progressing as an allocation.

HS26 Four Courts, Stonehouse Drive

Ranking: 2

Vulnerability: More Vulnerable (Dwellings)

Capacity: 450 (net 64)

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the regeneration of a housing estate site as part of a scheme that is expected to deliver a minimum of 450 dwellings, with a minimum net increase of 64 dwellings. It is in a highly sustainable location, close to the Battle Road retail centre and sustainable transport links. It is within walking distance of Silverdale Baird Primary Academy and local doctors surgeries.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

It is also expected to deliver new equipped play/ enhanced equipped play and retain/ replace and enhance the existing community centre and nursery and deliver a more usable, central public open space.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Four Courts, Stonehouse Drive Site lies within close proximity to the Hollington Stream Main River, with 0.86% of the site currently with some risk from fluvial flooding. There is limited potential for surface water flooding. The Site is proposed for residential development which is classed as "More Vulnerable". In accordance with the Flood Map for Planning, some parts of the Site are located within Flood Zones 2, 3 and 3b. Flood Zone 3b extends along the western Site boundary following the Main River. Flood Zones 2 and 3 are set back from existing built development within the Site. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The Hollington Stream Main River flows along and outside of the western Site boundary. It briefly enters a culvert in the south west corner of the site when it is crossed by Stonehouse Drive.

The risk of surface water flooding mapping (RoFfSW) highlights some areas of ponding at Sydney Close and associated with the existing high-rise blocks. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, this localised ponding is predicted to fill to depths of up to 0.2 m and 0.3 m respectively at Sydney Close, and up to 0.2 m in low probability events in the areas associated with existing buildings. During low

probability rainfall events, a surface water flow path is predicted to run east-west through the centre of the Site, following its topography until the pathway is capable of discharging into the Hollington Stream Main River. This flow pathway originates from the junction of Battle Road and Stonehouse Drive, and conveys water through the area of ponding at Sydney Close. During high probability rainfall events, the risk of surface water flood risk within the site is considered to be low.

As the Site is larger than 1 ha, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements. This should include interrogation of the flood levels on Site as predicted by detailed hydraulic modelling. Additionally, updated modelling may be required to reflect the latest climate change allowances which should be discussed with the Environment Agency.

Given the west of the Site is surrounded by floodplain, the flood hazard around the Site should be evaluated in order to determine the safest locations for access and egress to and from the Site during a flood event.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

"More Vulnerable" development is not permitted within Flood Zone 3b Functional Floodplain. A 10 m wide undeveloped buffer strip should be retained alongside a Main River and the floodplain preserved to provide flood storage function. New development within 8 m of a Main River will require a Flood Risk Activity Permit from the Environment Agency. In line with the sequential approach, development should be steered towards those areas located within Flood Zone 1 to the eastly areas of the Site, with more compatible development (such as open space) located in areas at greater risk.

Some of the Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Finished floor levels should be provided with a 600 mm freeboard above the modelled 0.5% AEP tidal flood level, including an allowance for climate change. Any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See the SFRA for specific details.

A Flood Warning and Evacuation Plan should be prepared and submitted with any application for development. This plan should consider actions occupants should take on receipt of an Environment Agency flood warning, safe access and egress routes, and are as of safe refuge within the building, above the design event (0.5% AEP including climate change). For further details refer to the Level 1 SFRA.

Safe access/egress is available for the Site along Stonehouse Drive (north), joining Hollington Old Lane, although consideration of existing and potential surface water flow pathways should be a factor when identifying whether engineered solutions may be required.

Recommendation

The above weighs in favour of this site progressing as an allocation

HSS14 Former Hillesden Mansions, 7-11 Chapel Park Road

Ranking: 4

Vulnerability: More Vulnerable (Dwellings)

Capacity: 15

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 15 dwellings. It is in a highly sustainable location, close to St Leonards District Centre and sustainable transport links including St Leonards Warrior Square Station on the London - Hastings line. It is within walking distance of St Mary Star of the Sea Primary School and local doctors surgeries.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Former Hillesden Mansions Site is proposed for residential development which is classed as "More Vulnerable". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The risk of surface water flooding mapping (RoFfSW) identifies areas of surface water flood risk within the Site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the areas of surface water are predicted to fill to depths of up to 0.20 m and 0.30 m respectively.

During high probability rainfall events, the risk of surface water flood risk within the site is considered to be high, affecting around a fifth of the site, with depths of up to 0.20 m.

Overall, the risk of flooding to the Site is moderate.

As the Site has a moderate risk of flooding from surface water, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

The Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield

run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is moderate.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, to the centre of the site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk.

Safe access/egress is available for the Site along Chapel Park Road (north), although consideration of existing and potential surface water flow pathways should be a factor when identifying whether engineered solutions may be required.

Recommendation

The above weighs in favour of this site progressing as an allocation

ES8 Land at junction of The Ridge West and Queensway

Ranking: 1

Vulnerability: Less Vulnerable (Employment)

Capacity: 4,700 sqm

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in a scheme that is capable of delivering 4,700 sqm B2/B8 employment floorspace. It is part of a wider industrial estate (Ridge West) and within the Queensway employment corridor, making it well located and close to logistics corridors for transporting freight to sea and air ports at Newhaven and London Gatwick, and by road to inland logistics hubs such as Thurrock, Gatwick and the outer Midlands.

The delivery of the site will contribute to the supply of employment floorspace needed to support the needs of a growing Borough. The delivery of workspace is important to the delivery of the overall spatial strategy.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Land at the Junction of Ridge West and Queensway Site is proposed for employment use which is classed as "Less Vulnerable". In accordance with Flood Map for Planning the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

There is an unnamed Ordinary Watercourse which flows through the south-east corner of the Site in a southerly direction. The risk of flooding from surface water mapping (RoFfSW) predicts that during high probability (3.33% AEP) and medium probability (1% AEP) rainfall events, a surface water flow path closely follows the alignment of the Ordinary Watercourse. The surface water flow path within the Site has predicted flood depths of up to 0.15 m and 0.30 m respectively. The Ordinary Watercourse is culverted under Whitworth Road and during high probability rainfall events there is a predicted flow path crossing Whitworth Road with depths up to 0.60 m.

Overall, the risk of flooding to the Site is low.

As the Site is larger than 1 ha, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

Given the Site is greenfield, development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates to greenfield rates for all events

up to and including the 1% AEP flood event with an allowance for climate change. The predicted risk of flooding from surface water to the Site is considered high.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

Given infiltration is unlikely due to the nature of the soil, subsoil and underlying strata, it is recommended to discharge surface water to the unnamed Ordinary Watercourse located to the south-east of the Site.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, away from the south-east of the Site.

An Ordinary Watercourse runs through the south-east of the Site and a minimum 5 m wide undeveloped buffer strip must be maintained along all reaches. ESCC sets out in their "Guidance for Application for Ordinary Watercourse Consent" document which works in the vicinity of the Ordinary Watercourses are permitted and which need their consent. Where consent is required, this should be discussed with ESCC prior to submission of a planning application.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Culverting of the watercourse should be avoided where possible and flow from the Site should not be increased post construction due to any watercourse modifications or due to an increase in Site runoff.

Safe access and egress are available for the Site, along The Ridge West (A2100) to access the north of the Site, Queensway (A2690) to access the west of the Site or Whitworth Road via Queensway (A2690) to access the south of the Site.

Recommendation

The above weighs in favour of this site progressing as an allocation

Opportunity Sites and Area of Development Potential

The council has identified a number of sites that may be capable of coming forward during the plan period, but which cannot get be considered to meet the tests of suitability, availability and/ or achievability. These sites have been identified as Regeneration Area Opportunity Sites and an Area of Development Potential.

The majority of these sites have also been identified as requiring the Exception Test through the performance of the Sequential Test.

OS1: Priory Street Carpark, ESK and Gizmo House

Ranking: 2

Vulnerability: More Vulnerable (Dwellings); Less Vulnerable (Town Centre Commercial Uses)

Capacity: 160 dwellings; 10,000 sqm commercial floorspace

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 160 dwellings and/ or 10,000 sqm commercial floorspace. It is in a highly sustainable location in Hastings Town Centre, close to Hastings railway station, bus station, shops, services, key evening and night time economy locations and the Resort Area. It is within walking distance of St Mary Star of the Sea Primary School and East Sussex College Group Hastings Campus.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2. It may also contribute to local economic growth needs through the provision of commercial floorspace.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Priory Street Site is proposed for mixed use which is classed as "More Vulnerable" and "Less Vulnerable". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. Geological data suggests there is potential for groundwater flooding to occur at the surface. There is no predicted risk of flooding to the Site from reservoirs.

The risk of flooding from surface water (RoFfSW) predicts an extensive area of surface water flooding during low probability (0.1% AEP) rainfall events where most of the Site is predicted to flood with depths greater than 1.2 m. During the medium probability (1% AEP) rainfall events, surface water flood risk is significantly reduced within the site boundary where localised areas to the north of the site with depths up to 0.6 m are predicted.

The Combe Haven Coastal Model indicates that during a 0.5% AEP flood event (2115), most of the Site is considered dry, with the exception of predicted tidal flooding to the north of the Site with depths of up to 2 m. Within this return period, depths of up to 1 m are estimated outside of the eastern Site boundary.

Overall, the risk of flooding to the Site is moderate.

Given the Site is brownfield, development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is high.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, in the south of the Site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Finished floor levels should be provided with a 600 mm freeboard above the modelled 0.5% AEP tidal flood level, including an allowance for climate change. Any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site.

A Flood Warning and Evacuation Plan should be prepared and submitted with any application for development. This plan should consider actions occupants should take on receipt of an Environment Agency flood warning, safe access and egress routes, and are as of safe refuge within the building, above the design event (0.5% AEP including climate change). For further details refer to the Level 1 SFRA.

Safe access and egress are available for the Site along Cambridge Road (A21) to the south of the Site.

A preliminary Hydrogeological Risk Assessment (HyRA) should be undertaken to determine ground conditions and groundwater levels in proximity to the Site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage. Should the preliminary HyRA identify potential for impact, a full HyRA should be prepared to identify proposed mitigation measures.

Recommendation

The above weighs in favour of this site progressing as an Opportunity Site.

OS4: Priory Meadow

Ranking: 1

Vulnerability: More Vulnerable (Dwellings); Less Vulnerable (Town Centre Commercial Uses)

Capacity: 130 Dwellings

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering 130 dwellings at higher elevations and retained commercial floorspace. It is in a highly sustainable location in Hastings Town Centre, close to Hastings railway station, bus station, shops, services, key evening and night time economy locations and the Resort Area. It is within walking distance of ARK Castledown Primary School and East Sussex College Group Hastings Campus.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Priory Meadow Site lies within close proximity to the sea and is therefore at risk from tidal flooding. Additionally, the Site is at a high risk of flooding from surface water. The Site is proposed for mixed use which is classed as "More Vulnerable" and "Less Vulnerable". In accordance with the Flood Map for Planning a marginal area in the east and western corner of the Site is located within Flood Zone 1, with the rest of the Site located within Flood Zones 3a and 2. Geological data suggests there is potential for groundwater flooding to occur at the surface. The Site also falls within the predicted flood extent in the unlikely event of a reservoir breach.

The Combe Haven Coastal Model indicates that during a 0.5% AEP flood event, the north-west, south-west and centre section of the Site is most vulnerable to tidal flooding. Within this return period, depths of up to 1 m are estimated, including localised areas predicted to reach depths of up to 2 m.

During the 0.5% AEP flood event (2115), the extent of flooding is predicted to increase with depths of up to 2 m in the east and western corner of the Site, with a "Danger to Most" Flood Hazard Rating. Mapping suggests the north-west, south-west and centre section of the Site are most vulnerable with depths of over 2 m and a "Danger to All" Flood Hazard Rating.

Overall, the risk of flooding to the Site is high.

As the Site is larger than 1 ha and lies within Flood Zone 3a, an Exception Test and a Site-Specific Flood Risk Assessment will be required as per NPPF requirements. This should include interrogation of the flood levels on Site as predicted by the detailed hydraulic modelling of the Combe Haven Coastal Model. Additionally, updated modelling may be required to reflect the latest climate change allowances which should be discussed with the Environment Agency.

Given the Site is surrounded by floodplain along the northern and southern boundaries and the sea to the south, the flood hazard around the Site should be evaluated in order to determine the safest locations for access and egress to and from the Site during a flood event.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

The overall risk of flooding to the Site is considered high and therefore it is recommended that the Site is not suitable for 'More Vulnerable' development.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk. Finished floor levels should be provided with a 600 mm freeboard above the modelled 0.5% AEP tidal flood level, including an allowance for climate change. Any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See the SFRA for specific details.

A Flood Warning and Evacuation Plan should be prepared and submitted with any application for development. This plan should consider actions occupants should take on receipt of an Environment Agency flood warning, safe access and egress routes, and are as of safe refuge within the building, above the design event (0.5% AEP including climate change). For further details refer to the Level 1 SFRA.

This Site is located within the "English Channel" Flood Warning Area. It is recommended for all those within this Flood Warning Area (residential and commercial occupiers) to sign up to Flood Warning Service operated by the Environment Agency.

Safe access and egress are available for the Site, along Queens Road (A2101), South Terrace, Station Road and Middle Street to access the south, east, north and west of the Site.

A preliminary Hydrogeological Risk Assessment (HyRA) should be undertaken to determine ground conditions and groundwater levels in proximity to the Site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage. Should the preliminary HyRA identify potential for impact, a full HyRA should be prepared to identify proposed mitigation measures.

Site proposals need to consider emergency planning requirements relating to residual risk from Reservoirs.

Recommendation

The above weighs in favour of this site progressing as an Opportunity Site.

OS6: Muriel Matters House

Ranking: 4

Vulnerability: More Vulnerable (Dwellings/ Hotel); Less Vulnerable (Town Centre Commercial Uses)

Capacity: Up to 35 Dwellings

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering up to 35 dwellings. It is in a highly sustainable location in Hastings Town Centre, close to Hastings railway station, bus station, shops, services, key evening and night time economy locations and the Resort Area. It is within walking distance of ARK Castledown Primary School and East Sussex College Group Hastings Campus.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include minimum 25% affordable homes, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Muriel Matters House Site is proposed for residential development which is classed as "More Vulnerable" and "Less Vulnerable". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The risk of surface water flooding mapping (RoFfSW) identifies areas of surface water flood risk within the Site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the areas of surface water are predicted to fill to depths of up to 0.20 m and 0.30 m respectively.

During high probability rainfall events, the risk of surface water flood risk within the site is considered to be high, affecting around a fifth of the site, with depths of up to 0.20 m.

Overall, the risk of flooding to the Site is moderate.

As the Site has a moderate risk of flooding from surface water, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

The Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff

rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is moderate.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, to the centre of the site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk.

Safe access/egress is available for the Site along Breeds Place/ Castle Hill Road although consideration of existing and potential surface water flow pathways should be a factor when identifying whether engineered solutions may be required.

Recommendation

The above weighs in favour of this site progressing as an Opportunity Site.

OS7: Land south of Ellenslea Road

Ranking: 4

Vulnerability: More Vulnerable (Dwellings); Less Vulnerable (Town Centre Commercial Uses); Water Compatible (Play Space).

Capacity: 6 Dwellings

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering up to 6 dwellings. It is in a highly sustainable location in St Leonards District Centre, close to St Leonards Warrior Square railway station, bus station, shops, services, key evening and night time economy locations and the Resort Area. It is within walking distance of St Mary Star of the Sea Primary School.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include affordable homes or a sum in lieu, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Land South of Ellenslea Road Site is proposed for residential development which is classed as "More Vulnerable", "Less Vulnerable" and "Water Compatible". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The risk of surface water flooding mapping (RoFfSW) identifies areas of surface water flood risk within the Site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the areas of surface water are predicted to fill to depths of up to 0.30 m and 0.20 m respectively.

During high probability rainfall events, the risk of surface water flood risk within the site is considered to be high, affecting around 40% of the site, with depths of up to 0.30 m.

Overall, the risk of flooding to the Site is high.

As the Site has a high risk of flooding from surface water, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

The Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield

run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is high.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, to the centre of the site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk.

Safe access/egress is available for the Site along Ellenslea Road.

Recommendation

The above weighs in favour of this site progressing as an Opportunity Site.

OS8: Land north of St Johns Road

Ranking: 4

Vulnerability: More Vulnerable (Dwellings); Less Vulnerable (Town Centre Commercial Uses); Water Compatible (Play Space).

Capacity: 10

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering up to 10 dwellings. It is in a highly sustainable location in St Leonards District Centre, close to St Leonards Warrior Square railway station, bus station, shops, services, key evening and night time economy locations and the Resort Area. It is within walking distance of St Mary Star of the Sea Primary School.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include affordable homes or a sum in lieu, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Land North of St Johns Road Site is proposed for residential development which is classed as "More Vulnerable", "Less Vulnerable" and "Water Compatible". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The risk of surface water flooding mapping (RoFfSW) identifies areas of surface water flood risk within the Site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the areas of surface water are predicted to fill to depths of up to 0.30 m and 0.60 m respectively.

During high probability rainfall events, the risk of surface water flood risk within the site is considered to be moderate, affecting around one third of the site, with depths of up to 0.30 m.

Overall, the risk of flooding to the Site is moderate.

As the Site has a moderate risk of flooding from surface water, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

The Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff

rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is moderate.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, to the centre of the site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk.

Safe access/egress is available for the Site along St Johns Road.

Recommendation

The above weighs in favour of this site progressing as an Opportunity Site.

OS9: Land south west of St Leonards Warrior Square Station

Ranking: 4

Vulnerability: More Vulnerable (Dwellings); Less Vulnerable (Town Centre Commercial Uses); Water Compatible (Play Space).

Capacity: 1

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

The delivery of the site will result in the redevelopment of a suitable Brownfield site as part of a scheme that is capable of delivering up to 1 dwelling. It is in a highly sustainable location in St Leonards District Centre, close to St Leonards Warrior Square railway station, bus station, shops, services, key evening and night time economy locations and the Resort Area. It is within walking distance of St Mary Star of the Sea Primary School.

The delivery of the site will contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing the housing need which has been identified in the Local Plan. This would include affordable homes or a sum in lieu, in line with Policy SP2.

The development of the site is also expected to deliver onsite green and blue infrastructure, biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's sustainability is considered to outweigh the flood risk.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

The Land south west of St Leonards Warrior Square Station Site is proposed for residential development which is classed as "More Vulnerable", "Less Vulnerable" and "Water Compatible". In accordance with the Flood Map for Planning, the Site is located within Flood Zone 1. The Site lies outside the region susceptible to groundwater flooding. There is no predicted risk of flooding to the Site from reservoirs.

The risk of surface water flooding mapping (RoFfSW) identifies areas of surface water flood risk within the Site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the areas of surface water are predicted to fill to depths of up to 0.20 m and 0.30 m respectively.

During high probability rainfall events, the risk of surface water flood risk within the site is considered to be moderate, affecting around one third of the site, with depths of up to 0.30 m.

Overall, the risk of flooding to the Site is moderate.

As the Site has a moderate risk of flooding from surface water, a Site-Specific Flood Risk Assessment will be required as per NPPF requirements.

The Site has previously been developed. For brownfield sites, the development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates for the 1% AEP rainfall event up to as close as reasonably practicable to the greenfield run-off rate. The runoff should never exceed the rate of discharge from the development prior to redevelopment for that event. The predicted risk of flooding from surface water to the Site is moderate.

Future development must be undertaken in consultation with ESCC to identify opportunities to alleviate flooding in the local area. Development proposals for the Site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing. Mitigation measures will be required to reduce or manage the risk of flooding from surface water to the proposed development; consideration should be given to the impact of those measures on the risk of flooding in the surrounding area.

The Environment Agency and ESCC will be the main consultees on any planning application submitted for this Site. They should be consulted throughout the pre-application process to inform the Site layout and development design.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, to the centre of the site.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk.

Safe access/egress is available for the Site along Station Approach.

Recommendation

The above weighs in favour of this site progressing as an Opportunity Site.

D1 Land at Breadsell

Ranking: 1

Vulnerability: More Vulnerable (Dwellings)

Capacity:

Assessment against NPPF 2026 Policy F6:

Provide wider sustainability benefits to the community that outweigh the flood risk

This is a cross-boundary site, with the southern portion in Hastings Borough and the northern portion in neighbouring Rother District. The delivery of the site would result in a scheme that may be capable of delivering 200-300 dwellings in Hastings and additional dwellings in neighbouring Rother. The site is not considered reasonably available at present as the suitability of the site for residential development has not yet been established. Taken in isolation, the Hastings portion alone or the Rother portion alone would be considered to be in a less sustainable location than reasonable alternatives. However, as a cross-boundary site and at the quantum of development proposed, the site may be viewed as more sustainable due to the connection of the site as a whole to the Hastings settlement area. The wider sustainability impacts of development in this location should therefore be considered in the cross-boundary context, and not solely the Hastings nor Rother context. Sustainable transport connections both within the site and to surrounding facilities and services including retail centres, schools and doctors surgeries would need to be established through the development of the site.

The delivery of the site would contribute to the supply of housing in the Borough, contributing to the housing requirement and addressing local housing needs for both Hastings and neighbouring Rother due to the cross-boundary nature of the site. This would include minimum 40% affordable homes, in line with Policy SP2. The site would additionally be expected to introduce new areas of publicly accessible open space and opportunities for equipped play in an area with wider deficiencies in access to equipped play and open space.

The delivery of the site is also expected to deliver onsite green and blue infrastructure and biodiversity net gain and urban greening, all of which will contribute to local and regional biodiversity and nature recovery objectives.

On this basis, the site's cross boundary sustainability is considered to outweigh the flood risk. Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

Be safe for its anticipated lifetime and not increase flood risk elsewhere and, where possible, reduce flood risk overall.

Land at Breadsell is bound by an ordinary watercourse at parts of its eastern, south western and northern boundaries. In accordance with the Flood Map for Planning, the site is located in Flood Zone 1, Flood Zone 3a and a small area of Flood Zone 3b along the line of the stream. The Site is proposed for mixed use which is classed as "More Vulnerable". The Site lies outside the region susceptible to groundwater flooding. There is limited potential for surface water flooding. There is no predicted risk of flooding to the Site from reservoirs.

There is a flow path through the site and runoff follows the route of Ordinary Watercourse, into Hastings Borough, however the extent in the Rother boundary is minimal. There are pockets of surface water associated with the wooded shaw to the west-centre of the site. During high probability (3.33% AEP) and low probability (0.1% AEP) rainfall events, the pockets are predicted to fill to depths of up to 0.30 m and 0.60 m respectively. During high probability rainfall events, the risk of surface water flood risk within the site is considered to be low.

Overall, the risk of flooding to the Site is low.

A Flood Risk Assessment should be undertaken for the site to inform further scheme planning for the site, which should be informed by any site-specific recommendations proposed in the SFRA Update (2026). This should include interrogation of the flood levels on site.

The Environment Agency and ESCC (LLFA) will be the main consultees on any planning application submitted for this Site. They should be consulted through pre-application process to inform the Site layout and development design.

An Ordinary Watercourse is present at various points along the boundary of the Site and a minimum 5 m wide undeveloped buffer strip must be maintained along all reaches, preferentially to 10 m. This should not be conflated with ecological buffers required for adjacent SSSI. ESCC sets out in their "Guidance for Application for Ordinary Watercourse Consent" document which works in the vicinity of the Ordinary Watercourses are permitted and which need their consent. Where consent is required, this should be discussed with ESCC prior to submission of a planning application.

A sequential approach to Site planning should be applied within new development sites. Development with higher vulnerability should be preferentially allocated to areas with lower flood depths, set back from the boundaries of the Site and the wooded shaw. Water-compatible development, such as open space and play facilities, may be directed more freely throughout the site provided it takes into account the recommendations of the SFRA (2026) and this document.

A 'dry' access/egress must be provided in the form of a route located above the 1% annual probability flood level including an allowance for climate change for all flood sources (0.5% annual probability flood level including climate change should be used for fluvial flooding). There are no obvious barriers to the delivery of such access/egress from Hastings Road.

Any development should not affect flood routing and not increase flood risk elsewhere and where possible, reduce flood risk overall. The development should integrate opportunities within the Site design to accommodate water and reduce the flood risk, with regard to the findings of any monitoring associated with the hydrological and hydrogeological conditions required by the SSSI.

Given the Site is greenfield, development will be required to control surface water runoff arising from the Site and restrict surface water runoff rates to greenfield rates for all events up to and including the 1% AEP flood event with an allowance for climate change.

At the quantum of development proposed, it is not anticipated that there should be any loss of flood storage capacity within the floodplain, and proposals should seek to ensure that capacity is retained. Should this not be possible, any net loss of flood storage capacity within the floodplain will need to be compensated for on a level for level, volume by volume basis elsewhere within the Site. Maintaining the existing boundary levels between Breadsell

Lane and the Site will ensure that flow will not be diverted onto the Site from the road during flood events.

Any development within Flood Zones 2 or 3 should include flood resistant or resilient measures. See the Level 1 SFRA for specific details.

Safe access/ egress to the site is available from Hastings Road

A preliminary Hydrogeological Risk Assessment (HyRA) should be undertaken to determine ground conditions and groundwater levels both within and in proximity to the Site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage, and to provide a more detailed understanding of where within the site groundwater flooding is most likely to occur. Should the preliminary HyRA identify potential for impact, a full HyRA should be prepared to identify proposed mitigation measures. These may include finished floor levels above the maximum wet-season groundwater level; avoiding the use of below-ground structures, and ensuring utilities systems sit well above potential saturation zones, including battery storage, meters, circuitry and distribution boards.

Recommendation

The above weighs in favour of this site progressing as an Area of Development Potential.

