Sequential and Exception Test for Planning

January 2026

Prepared for:

Stag Construction Services Ltd

Location:

9 Station Parade, Tarring Road, West Sussex, BN11 4SS

Our reference:

95586-Boys-StationRd ST v2.0 270126

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Document Issue Record

Project Details	
Project:	Sequential and Exception Test for Planning
Prepared for:	Stag Construction Services Ltd
Application:	Construction of a new single residential unit
Location:	9 Station Parade, Tarring Road, West Sussex, BN11 4SS
Our reference:	95586-Boys-StationRd ST v2.0 270126
Issue no.:	v2.0
Issue date:	27th January 2026

Project Consultants	
Lead Consultant:	Mr Edward Bouët, BSc (Hons)
Document Check:	Miss Ellen Webb, BSc (Hons), Miss Jesy Ferry, MSc
Authorisation:	Mr Edward Bouët, BSc (Hons)

This Sequential and Exception Test Report (including any appendices, enclosures or referenced attachments) has been prepared exclusively for the commissioning client, Stag Construction Services Ltd, in support of a planning application for the construction of a single residential dwelling at 9 Station Parade, Tarring Road, Worthing, West Sussex. The report is intended solely for use within the planning process and has been prepared in accordance with the requirements of the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) on Flood risk and coastal change, and relevant guidance issued by the Environment Agency, Worthing Borough Council, and the Lead Local Flood Authority.

This report does not constitute legal advice, detailed engineering design advice, or any form of guarantee regarding flood risk, groundwater behaviour or drainage performance. Any planning, technical or design decisions made on the basis of this report remain the sole responsibility of the client, their appointed consultants, or the determining planning authority.

Where information has been obtained from third-party datasets — including Environment Agency flood mapping, the Adur and Worthing Strategic Flood Risk Assessment, public planning registers and other environmental datasets — it has been assumed to be accurate as provided and has not been independently verified unless explicitly stated. No representation is made regarding the completeness or continued accuracy of such information beyond the date of issue.

Planning policy, environmental conditions and regulatory standards may change over time. This report reflects the policy context, datasets and evidence available at the time of writing. It is therefore valid only as of the date of issue and may require revision should the proposed development, supporting information, or relevant policy or guidance materially change.

This report does not include detailed surface water drainage design. A site-specific Flood Risk Assessment and Surface Water Drainage Strategy has been prepared separately by Unda Consulting Limited in support of the planning application. Any subsequent detailed drainage design — including SuDS specifications, hydraulic calculations, infiltration testing or additional groundwater assessment where required — should be undertaken at the appropriate design stage and in consultation with the Environment Agency, the Lead Local Flood Authority and Worthing Borough Council.

Contents

1. Introduction

1.1. Unda Consulting Limited have been appointed by Stag Construction Services Ltd (hereinafter referred to as "the applicant") to undertake a Sequential Test to support the proposed development at 9 Station Parade, Tarring Road, Worthing, West Sussex, BN11 4SS (hereinafter referred to as "the site").

1.2. The Sequential Test (ST) is designed to determine whether there are any reasonably available alternative sites in areas of lower flood risk that could accommodate the proposed development, in accordance with national planning policy and associated guidance.

1.3. The site is not allocated in the adopted Worthing Local Plan (2023) and has not previously been subject to a Sequential Test through any strategic allocation process. Accordingly, the Sequential Test must be applied at the planning application stage in line with the requirements of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

1.4. The requirement for a Sequential Test in respect of this proposal was confirmed by the Local Planning Authority during the course of pre-determination discussions. Written advice provided by the Council's Principal Planning Officer on 7 April 2025 confirmed that, due to changes in national and local flood risk policy and the site's location within an area identified as being at high risk of surface water flooding, a site-specific Flood Risk Assessment and Sequential Test would be required to support the application.

1.5. That advice also set out the appropriate methodology for undertaking the Sequential Test. In particular, it was confirmed that:

- the area of search should comprise the entirety of Worthing Borough;
- the Sequential Test should be undertaken in accordance with the guidance set out in the Planning Practice Guidance;
- the starting point for identifying reasonably available alternative sites should include the Strategic Housing Land Availability Assessment (SHLAA), the Housing Land Supply Position Statement (April 2024), and other relevant sources such as sites currently available on the open market;
- reference should be made to the Council's Strategic Flood Risk Assessment (2024) and the Government's Flood Map for Planning.

1.6. The Sequential Test methodology adopted for this report has been prepared directly in response to that advice and is therefore consistent with both national policy and the Local Planning Authority's expectations for the assessment of alternative sites. The assessment has also been informed by the latest version of the Planning Practice Guidance on flood risk and coastal change (updated September 2025), which confirms that the Sequential Test must be applied having regard to all sources of flood risk, including surface water flooding, and that the scope and depth of assessment should be proportionate to the scale and nature of the development proposed, supported by appropriate and up-to-date evidence.

1.7. Paragraph 180 of the National Planning Policy Framework (NPPF, December 2024) confirms that:

> *"Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again."*

1.8. As the site is not part of any allocated development plan site, this Sequential Test has been prepared independently and specifically to inform the current planning application. The sites considered during the sequential assessment are detailed in Appendix A of this report.

1.9. Although the site lies within Flood Zone 1 for fluvial and tidal flood risk, mapping published by the Environment Agency and referenced in the accompanying Flood Risk Assessment identifies the site as being at high risk of surface water flooding, both in the present day and under future climate change scenarios. In accordance with the Planning

Practice Guidance and local policy, this necessitates the application of the Sequential Test to ensure that there are no reasonably available alternative sites at a lower risk of flooding that would be more appropriate for the proposed residential development.

2. Summary of Flood Risk Assessment

2.1. A detailed Flood Risk Assessment (FRA) has been prepared by Unda Consulting Limited (Ref: 95586-Boys-StationRd, updated January 2026) to support the proposed development at 9 Station Parade. The FRA assesses all relevant sources of flood risk and sets out mitigation measures to ensure that the development will be safe for its lifetime, taking account of climate change in accordance with national policy and guidance. The FRA is supported by a detailed Surface Water Drainage Strategy, which confirms how surface water runoff will be managed on site without increasing flood risk elsewhere.

Flood Zone Classification

2.2. The site lies within Flood Zone 1, as defined by the Environment Agency's Flood Map for Planning. Flood Zone 1 denotes land having a less than 1 in 1,000 annual probability of river or sea flooding. However, national policy and Planning Practice Guidance make clear that the Sequential Test must consider all sources of flood risk, not solely fluvial and tidal flooding.

2.3. The requirement for a Sequential Test in this case arises because the site is located within an area identified as being at high risk of surface water flooding, as shown on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping and confirmed by the Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024).

Tidal and Fluvial Flood Risk

2.4. There is no identified risk of tidal or fluvial flooding at the site. In particular, the site is:

- located over 1 km inland from the English Channel;
- situated in an area with no Environment Agency flood defences;
- not within a flood storage area; and
- not affected by residual risk associated with defence overtopping or breach, given its inland location and the absence of adjacent formal defences.

Surface Water Flooding

2.5. Environment Agency RoFSW mapping identifies the site as being at high risk of surface water flooding under both present-day conditions and future climate change scenarios. The mapping indicates:

- modelled surface water depths of approximately 0.2 m to 0.3 m across parts of the site, including areas within the proposed building footprint;
- similar or marginally increased extents and depths under future climate change scenarios; and
- potential surface water flow paths affecting nearby access routes during intense rainfall events.

2.6. The FRA and accompanying drainage strategy assess these risks using conservative design standards and demonstrate how they are mitigated through layout, finished floor levels, and surface water management.

Groundwater, Sewer and Other Sources

2.7. Groundwater flooding is identified in the SFRA as a potential consideration, with groundwater levels shown to be within approximately 5 m of the surface. However, there are no recorded incidents of groundwater flooding affecting the application site.

2.8. Sewer flooding records identify a small number of historic surcharge incidents within the wider BN11 4 postcode area. None of these incidents are recorded as affecting the application site directly.

2.9. The site lies outside of any mapped reservoir inundation or breach zone, and the risk of flooding from reservoir sources is therefore considered negligible.

Proposed Mitigation Measures

2.10. The FRA proposes a range of mitigation measures to ensure that flood risk to the development is appropriately managed and that the development will remain safe for its lifetime. These measures include:

- raising finished floor levels by approximately 220 mm above existing ground levels, with an additional 220 mm step to the bedroom area, providing a total internal floor level approximately 440 mm above existing ground, exceeding modelled surface water depths;
- incorporation of flood-resilient and flood-resistant construction measures, including:
    - waterproof membranes and renders;
    - raised electrical sockets, meters and services;
    - flood-resistant doors and non-return valves; and
    - resilient ground floor materials and construction detailing;
- implementation of a site-specific surface water drainage strategy incorporating on-site attenuation and controlled discharge, designed to accommodate rainfall events up to and including the 1 in 100 year event with an appropriate allowance for climate change;
- identification of a safe access and egress route via Valencia Road to Rugby Road, which remains outside significant surface water flood extents when assessed against the design standards adopted in the FRA and drainage strategy; and
- provision of flood awareness measures, including advising future occupants to register with the National Severe Weather Warning Service and the implementation of a site-specific flood warning and evacuation plan.

2.11. Together, these measures demonstrate that the development can be made safe for its lifetime, without increasing flood risk elsewhere, and provide the technical basis for the application of the Sequential and Exception Tests set out in the following sections.

3. Planning Policy:

National Policy:

3.1. The National Planning Policy Framework (NPPF) stresses the importance of avoiding inappropriate development in areas at risk of flooding and, where development is necessary in such areas, ensuring it is safe for its lifetime without increasing flood risk elsewhere (NPPF, December 2024).

3.2. Local Planning Authorities are expected to take a risk-based approach to development proposals in or affecting flood risk areas through the application of the Sequential Test (and, where necessary, the Exception Test).

3.3. The NPPF sets out the purpose of the Sequential Test, including that it should "steer new development" to "the lowest risk of flooding from any source".

3.4. The NPPF also confirms that the Sequential Test should be applied in areas known to be at risk now or in the future from any form of flooding, with a limited exemption where a site-specific flood risk assessment demonstrates that no built development (including access/escape routes and other vulnerable elements) would be located in an area at risk of flooding now and in the future.

3.5. Having applied the Sequential Test, the NPPF provides that where it is not possible to locate development in areas with a lower risk of flooding (taking account of wider sustainable development objectives), the Exception Test may have to be applied, depending on the vulnerability classification of the development proposed (Annex 3).

3.6. The application of the Exception Test should be informed by a strategic or site-specific flood risk assessment (as applicable), and to pass the test it must be demonstrated that the development would provide wider sustainability benefits to the community that outweigh the flood risk, and that it will be safe for its lifetime (taking account of vulnerability), without increasing flood risk elsewhere and, where possible, reducing flood risk overall.

3.7. The phrase "reasonably available" is central to the Sequential Test. The Government's Planning Practice Guidance (PPG) on *Flood risk and coastal change* provides additional guidance on how this term should be understood and how the Sequential Test should be applied in practice. The PPG webpage was last updated on 17 September 2025, and the Sequential Test guidance that is most relevant to this assessment includes paragraphs updated on that date.

3.8. Within the section "The sequential approach to the location of development", the PPG explains that avoiding flood risk through the Sequential Test is the most effective way of addressing flood risk because it places the least reliance on measures such as defences, warnings and property-level resilience, and that the sequential approach helps steer development to the lowest risk areas where compatible with sustainable development objectives.

3.9. The PPG further confirms that, for planning applications, the Sequential Test should be applied proportionately, and that in applying NPPF paragraph 175 a proportionate approach should be taken.

3.10. The September 2025 updates to the PPG include explicit guidance on:

- **How the area of search should be identified** (Paragraph 027, Reference ID: *7-027-20220825*, Revision date: 17/09/2025), including that the catchment area should be appropriate to the nature and scale of the proposal and the settlement it is proposed for, and that the Sequential Test should focus on realistic alternatives in areas of lower flood risk that could meet the same development need.
- **What constitutes a "reasonably available" site** (Paragraph 027a, Reference ID: *7-027a-20220825*, Revision date: 17/09/2025), including that alternative sites do not need to be owned by the applicant to be considered reasonably available and that a reasonably available site must have a suitable location, meet the same development needs, and have a reasonable prospect of being developed at the same time as the proposal.

- **The respective roles of decision maker and applicant** (Paragraph 028, Reference ID: *7-028-20220825*, Revision date: 17/09/2025), including that the planning authority determines an appropriate search area and the applicant identifies other reasonably available sites not already captured in allocations/availability assessments, including sites on the open market, and may need to check current site status.

3.11. The Flood Risk Vulnerability Classification set out in Annex 3 of the NPPF classifies residential development as 'More Vulnerable'. In this case, the proposal comprises a single residential unit and therefore falls within the 'More Vulnerable' vulnerability category.

3.12. As the application site is not allocated through the development plan process and is identified as being affected by surface water flood risk, the Sequential Test is required at the application stage.

Local Policy:

3.13. At the time of writing, the application site lies within the administrative area of Worthing Borough Council. Planning decisions in this area are guided by the Worthing Local Plan 2020–2036 (adopted March 2023). The Local Plan is supported by the Council's technical evidence base, including the Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024) and the Council's Sequential Test Methodology (July 2024).

3.14. Together, these documents establish a local planning framework that aligns with the National Planning Policy Framework and Planning Practice Guidance, emphasising a risk-based approach to steering development away from areas of highest flood risk and ensuring that, where development is necessary in areas of flood risk, it is made safe for its lifetime without increasing flood risk elsewhere. This local framework applies to all sources of flooding, including surface water flooding.

3.15. The Worthing Local Plan (2023) includes Development Management Policy DM20: Flood Risk and Sustainable Drainage, which provides the principal local policy basis for flood risk decision-making. DM20 confirms that:

> *"The Council will work with relevant bodies to ensure that flood risk in Worthing is managed and reduced. Development should be directed away from areas of highest risk of flooding from any source and opportunities should be taken to reduce flooding through sustainable drainage systems and natural flood management to deliver multi-functional benefits for people and wildlife."*

3.16. DM20 also confirms the circumstances in which a site-specific Flood Risk Assessment is required and states that:

> *"A site specific Flood Risk Assessment must be submitted with planning applications for:*
> *i) sites of 1 hectare or greater in Flood Zone 1;*
> *ii) all new development (including minor development and change of use) in Flood Zones 2 and 3;*
> *iii) development that would introduce a more vulnerable class on land at increased flood risk in future or subject to other sources of flooding identified by the Strategic Flood Risk Assessment."*

3.17. DM20 further confirms that Flood Risk Assessments should be proportionate to risk and scale, and must demonstrate, amongst other matters, that:

> *"the site has passed the sequential test … and within the site the most vulnerable development is located in areas at lowest flood risk from any source unless there are overriding reasons for not doing so;"*

3.18. and, where required by national policy, that both parts of the Exception Test have been passed. The policy also requires assessment of current and future flooding from all sources (including in-combination and cumulative effects), safe access and egress where necessary (including through an agreed flood warning and evacuation plan), and that development is appropriately flood resistant and resilient.

3.19. The Adur and Worthing SFRA (2024) forms part of the local evidence base and provides mapping and analysis of flood risk from rivers, the sea, surface water, sewers and groundwater, including consideration of climate change where appropriate. The SFRA identifies that parts of Worthing are affected by notable surface water flood risk, and it provides the basis for applying the sequential approach locally in relation to surface water, alongside fluvial and tidal sources.

3.20. In support of decision-making, the Council's Sequential Test Methodology (July 2024) provides guidance for undertaking proportionate Sequential Tests in the local authority area. It sets out a structured approach to the use of available flood risk mapping and datasets (including surface water mapping) and confirms that the sequential approach should be applied having regard to all sources of flood risk, both now and in the future, consistent with national policy and guidance.

3.21. In summary, the adopted local policy context clearly supports the requirement for a Sequential Test where residential development is proposed in areas affected by identified flood risk from any source, including surface water. This assessment has been undertaken in accordance with that requirement, and has been informed by the most up-to-date adopted local policy and supporting technical evidence.

Legal Considerations:

3.22. The preparation of this Sequential Test has had regard to relevant legal authority on the interpretation and application of national flood risk policy and guidance, including the Courts' approach to the relationship between the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance (PPG).

3.23. The Court of Appeal decision in Mead Realisations Ltd v Secretary of State for Housing, Communities and Local Government 2025EWCA Civ 32 confirms that the PPG is capable of carrying the same legal status as national policy in the NPPF, and that the NPPF and PPG may be used as aids to the interpretation of each other. The Court held that PPG guidance on the sequential test was consistent with the NPPF and explained how the NPPF policy is intended to operate in practice, including in relation to what constitutes a "reasonably available" alternative site.

3.24. Accordingly, when applying national flood risk policy (including the Sequential and Exception Tests), it is necessary to have proper regard to the relevant PPG content, particularly where the NPPF is expressed at a high level and the PPG provides practical guidance on implementation.

3.25. More recently, the High Court in Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government and Lancaster City Council 2026EWHC 51 (Admin) considered an Inspector's approach to a refusal/dismissal where a Sequential Test had not been provided. The judgment is relevant in confirming that the existence of a Sequential Test issue (and associated conflict with policy) does not remove the need for a lawful and reasoned planning judgment, including an adequate explanation of how that policy conflict is weighed in the overall decision-making process under the statutory duties.

3.26. The judgment identifies error where an inflexible or mechanistic approach is taken to the absence of a Sequential Test (or the conclusion that it is required), without undertaking or explaining the necessary balancing exercise on the facts of the particular case.

3.27. These legal principles are directly relevant to the assessment of the proposed development at 9 Station Parade, where the Sequential Test is engaged by identified surface water flood risk notwithstanding the site's location within Flood Zone 1 for fluvial and tidal risk. In line with national policy and guidance, the Sequential Test must therefore be applied having regard to all sources of flooding and future flood risk, supported by appropriate and up-to-date evidence, and interpreted in a manner consistent with the NPPF as informed by the PPG.

3.28. In this context, the above authorities reinforce the approach taken in this report: the Sequential Test has been undertaken with reference to the current NPPF and the latest relevant PPG, drawing on the most up-to-date flood

risk evidence for surface water flooding (including Environment Agency mapping and the 2024 SFRA), and presenting the reasoning in a clear and structured manner capable of supporting lawful decision-making.

4. The Sequential Test

Agreed Sequential Test Methodology and Area of Search:

4.1. The requirement for a Sequential Test in respect of the proposed development, and the scope of that assessment, were confirmed by the Local Planning Authority during the course of pre-determination correspondence.

4.2. Written advice provided by the Council's Principal Planning Officer on 7 April 2025 confirmed that, due to changes in national and local flood risk policy and the identification of the site as being at high risk of surface water flooding, a site-specific Flood Risk Assessment and Sequential Test would be required to support the application.

4.3. That correspondence also set out the methodology to be followed when undertaking the Sequential Test. In particular, the Local Planning Authority confirmed that:

- the appropriate area of search should comprise the entirety of Worthing Borough;
- the Sequential Test should be undertaken in accordance with the Planning Practice Guidance on flood risk and coastal change;
- the starting point for identifying reasonably available alternative sites should include the Strategic Housing Land Availability Assessment and the Housing Land Supply Position Statement (April 2024);
- the assessment should also consider other reasonably available sites not identified through plan-making processes, including sites currently available on the open market; and
- reference should be made to the Council's Strategic Flood Risk Assessment (2024) and the Government's Flood Map for Planning.

4.4. The Sequential Test methodology adopted in this report, including the definition of the area of search, the sources used to identify alternative sites, and the criteria applied in assessing suitability and availability, has been prepared directly in response to that advice. The approach taken is therefore consistent with both national guidance and the Local Planning Authority's stated expectations for the application of the Sequential Test to this proposal.

Policy and Application:

4.5. The approach to the Sequential Test has been informed by the Government's Planning Practice Guidance (PPG) on Flood risk and coastal change, which provides detailed guidance on how the Sequential Test should be applied to planning applications in practice. The assessment has been undertaken having regard to the latest version of the PPG, updated in September 2025, and the National Planning Policy Framework (December 2024).

4.6. The PPG confirms that the Sequential Test applies to both major and non-major development proposed in areas at risk of flooding. This includes sites affected by surface water flooding, even where they fall within Flood Zone 1 for fluvial and tidal flood risk. The guidance also confirms that the Sequential Test is not required only in limited circumstances, including where a site has been allocated through the development plan and previously subject to the test, where a site is at low risk from all sources of flooding (unless future risk is identified), or where the development type is specifically exempt under national policy.

4.7. For individual planning applications, the PPG explains that the appropriate area of search for the Sequential Test should be defined by local circumstances, having regard to the nature and scale of the development proposed and the relevant catchment area. The guidance recognises that a proportionate and pragmatic approach is required, particularly for small-scale development, and that the Sequential Test should focus on identifying realistic and reasonably available alternative sites that could meet the same development need at a lower level of flood risk.

4.8. In this case, the proposed development comprises a non-major residential scheme involving the construction of a single dwelling. Although the site lies within Flood Zone 1 for fluvial and tidal flooding, it is identified as being at high risk of surface water flooding by both the Environment Agency's Risk of Flooding from Surface Water mapping and the Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024). As such, and in accordance with national guidance, the Sequential Test is required.

4.9. The site is not allocated in the Worthing Local Plan and there is no evidence that it has previously been subject to the Sequential Test through the plan-making process. The proposal is not exempt under national policy. A full Sequential Test is therefore required at the planning application stage.

4.10. In addition to national policy and guidance, the Sequential Test has been undertaken having regard to the Adur and Worthing Councils' Sequential Test Methodology (July 2024). This local guidance confirms that the Sequential Test applies to all sources of flood risk, including surface water flooding, and reinforces the need for a proportionate, evidence-led approach based on the most up-to-date flood risk information.

4.11. The methodology requires applicants to demonstrate that there are no reasonably available alternative sites at a lower risk of flooding that could accommodate the proposed development, using robust and current evidence, including the Strategic Flood Risk Assessment and Environment Agency mapping. For smaller-scale residential development, the methodology recognises that the area of search will normally reflect the relevant settlement or built-up area, unless a wider catchment is justified by the functional requirements of the proposal.

4.12. The Adur and Worthing Strategic Flood Risk Assessment (2024) provides important context for the application of the Sequential Test in this case. It identifies surface water flooding as the most widespread source of flood risk across the borough and confirms that significant areas of Worthing are affected by high surface water flood risk under both present-day conditions and future climate change scenarios. The SFRA specifically identifies parts of Tarring Road, including the application site, as lying within areas subject to surface water flooding with modelled depths of approximately 0.2–0.3 metres, which persist under climate change allowances.

4.13. Having regard to this national and local policy framework, the Sequential Test must demonstrate that there are no reasonably available alternative sites at a lower risk of flooding from any source that could accommodate a comparable form of residential development. The following sections therefore define the area of search and set out the assessment of alternative sites undertaken in accordance with this guidance.

Area of Search:

4.14. The area of search for the Sequential Test has been defined having regard to the nature and scale of the proposed development, the characteristics of the settlement, and the requirements of national and local guidance.

4.15. The proposed development comprises a single residential dwelling within the built-up area of Worthing. It is a non-major form of development with no functional or operational requirement to be located in a specific part of the borough beyond the need to deliver a small-scale residential unit within an established urban area. In accordance with the Planning Practice Guidance, the area of search must therefore be proportionate and focused on identifying realistic and reasonably available alternative sites capable of accommodating a comparable form of development.

4.16. Having regard to this context, the area of search for the Sequential Test has been defined as the administrative area of Worthing Borough. This reflects the approach set out in the Planning Practice Guidance, which confirms that the catchment area for the Sequential Test should be appropriate to the development proposed, and that for general residential development this will typically align with the relevant settlement or local authority area, unless a wider area is justified by specific functional requirements.

4.17. Within this borough-wide search area, the Sequential Test focuses on sites that are genuinely capable of accommodating a comparable residential development within a similar timeframe. This includes consideration of sites identified through plan-making and land availability processes, as well as other sites that may be reasonably available outside formal allocations, such as sites currently being marketed for residential development.

4.18. The assessment does not treat all land within the search area as automatically suitable. In line with national guidance, the Sequential Test distinguishes between sites that are theoretically capable of accommodating development and those that are realistically available, suitable, and deliverable for a scheme of this nature. In particular, the assessment has regard to whether alternative sites:

- are available within a comparable timeframe to the proposed development;
- are suitable in scale, character and planning status to accommodate a single dwelling or small residential scheme without reliance on speculative subdivision of larger sites;

- are not already committed, built out, or subject to planning constraints that would preclude delivery of a comparable form of development; and
- would not themselves be subject to an equal or greater level of flood risk from any source.

4.19. While larger allocated or regeneration sites within the borough are acknowledged as part of the overall housing supply, the Sequential Test does not assume that a single dwelling could reasonably be delivered within such sites in isolation from their wider development strategy. In accordance with the Planning Practice Guidance, the test focuses on realistic alternatives that could meet the same development need, rather than hypothetical capacity within sites that are not available or deliverable for independent small-scale residential development.

4.20. The Sequential Test site search has therefore drawn on a combination of sources to identify potential alternative sites within the defined area of search. These include the Strategic Housing Land Availability Assessment, the Housing Land Supply Position Statement, the Brownfield Land Register, and publicly available market listings for residential land. The sites identified through this process are assessed in the following section against consistent criteria relating to availability, suitability, planning status, scale, and flood risk from all sources.

Sequential Test Search:

4.21. A comprehensive and proportionate Sequential Test site search has been undertaken in accordance with the agreed methodology set out in the preceding sections of this report. The search reflects the scale and nature of the proposed development and has been carried out across the administrative area of Worthing Borough, which represents the appropriate and proportionate area of search for a non-major residential proposal comprising a single dwelling.

4.22. The site search identified 33 potential sites across the borough. These were drawn from the Strategic Housing Land Availability Assessment, the Housing Land Supply Position Statement (April 2024), the Brownfield Land Register, and a review of publicly available land and plot listings from market portals including Rightmove, Zoopla and OnTheMarket. The market-facing element of the search was updated immediately prior to submission to ensure that any additional sites that may have come forward were captured and assessed.

4.23. All identified sites were assessed individually and systematically against flood risk from all sources, availability, suitability, scale, planning status and deliverability. The outcome of this assessment is presented in Appendix A, which provides a complete site-by-site analysis of every location considered, including the specific flood risk characteristics of each site and the detailed reasons why it does or does not represent a reasonably available and sequentially preferable alternative. Appendix A therefore forms an integral part of the Sequential Test and should be read as the full evidential record of the site search, rather than as a high-level summary.

4.24. The assessment demonstrates that surface water flooding is a widespread constraint within Worthing Borough. A significant proportion of sites assessed are affected by surface water flood risk that is comparable to, or greater than, that affecting the application site, even where they fall within Flood Zone 1 for fluvial and tidal flooding. For example, sites such as the Stagecoach Bus Depot at Library Place are subject to significantly higher flood risk, including Flood Zone 3 classification, and were excluded on that basis. Numerous smaller SHLAA backland sites, particularly those along Chapel Road and the High Street, are identified as being affected by surface water flooding of a similar depth and extent to the application site and therefore do not represent sequentially preferable alternatives when assessed on an all-sources basis.

4.25. A further substantial group of sites was excluded because there is no evidence that they are reasonably available or deliverable within a comparable timeframe. This includes a large number of SHLAA sites where there is no indication of landowner intent, active marketing or development activity. Backland sites identified through the SHLAA commonly fall into this category, with no evidence that they are available or capable of being brought forward independently. Public or operational sites such as Tarring Road Car Park and Lyndhurst Road Car Park were also excluded, as there is no evidence that they are available for residential development.

4.26. Sites that benefit from extant planning permissions or are otherwise committed were excluded as they cannot realistically accommodate an alternative single-dwelling proposal. Examples include 19 Reigate Road, which benefits from permission for a flatted development, and 31 West Buildings, which is approved for residential use. These sites are already committed to specific development outcomes and are not reasonably available as alternatives.

4.27. A number of sites identified through the SHLAA and land supply sources form part of larger strategic allocations or regeneration schemes, including Teville Gate, Union Place and Buckingham Road. While these sites may contribute to housing delivery at a strategic level, they are subject to comprehensive masterplanning, phasing and delivery strategies and are intended to deliver multi-unit or mixed-use schemes. The Sequential Test does not assume that a single dwelling could reasonably be delivered in isolation within such sites, and they do not represent comparable alternatives for the purposes of this assessment.

4.28. Other sites were excluded due to physical or site-specific constraints, including restricted or unsafe access arrangements, constrained plot geometry, servicing limitations, or the inability to provide compliant parking and amenity space. This applies in particular to a number of backland and infill sites where access is dependent on third-party land or where development would result in unacceptable design or amenity impacts. Several market-listed plots were also excluded on the basis of uncertain planning status, unresolved access or servicing issues, and lack of evidence that a policy-compliant dwelling could be delivered within a comparable timeframe.

4.29. When considered in the round, the Sequential Test site search shows that sites were excluded for a combination of reasons, including equal or higher flood risk from one or more sources, lack of availability or deliverability, incompatibility in scale or typology, and physical or policy constraints. Every site identified through the Sequential Test has been examined and reported in Appendix A, and no site meets all of the necessary criteria to represent a reasonably available, deliverable and lower flood risk alternative capable of accommodating a comparable form of residential development within a similar timeframe.

4.30. Accordingly, the evidence demonstrates that, within the defined area of search, there are no reasonably available alternative sites at a lower risk of flooding from all sources. The application site at 9 Station Parade is therefore confirmed to be the most sequentially appropriate location for the proposed development when assessed against current national policy, Planning Practice Guidance and the adopted local policy framework.

Conformity with Sequential Test Methodology:

4.31. The approach taken in this Sequential Test is fully aligned with both the Adur & Worthing Councils' Sequential Test Methodology (July 2024) and national guidance set out in the Planning Practice Guidance (PPG) on Flood risk and coastal change (as updated September 2025). The assessment has also been undertaken in accordance with the scope and methodology confirmed by the Local Planning Authority during pre-determination discussions.

4.32. In defining the area of search, regard has been had to the scale and nature of the proposed development, which comprises a single residential dwelling. Consistent with both the PPG and the Council's Sequential Test Methodology, the appropriate and proportionate area of search has been defined as the administrative area of Worthing Borough. This reflects the advice provided by the Council's Principal Planning Officer, who confirmed that the Sequential Test should be undertaken on a borough-wide basis and informed by the Council's housing land supply evidence and market availability.

4.33. A comprehensive and up-to-date evidence base has been used to identify potentially suitable and available alternative sites within this defined area of search. This includes the Strategic Housing Land Availability Assessment, the Housing Land Supply Position Statement (April 2024), the Brownfield Land Register, the Council's online planning register, Environment Agency flood risk mapping, and a review of publicly advertised residential land and plot listings from market sources including Rightmove, Zoopla and OnTheMarket. The market-facing element of the search was updated immediately prior to submission to ensure that current availability was captured.

4.34. Each site identified through this process has been assessed individually against the key Sequential Test criteria set out in national and local guidance. This includes consideration of site suitability for residential development, availability and deliverability within a comparable timeframe, planning status, scale and typology, and flood risk from all relevant sources. Flood risk has been assessed using the Environment Agency Flood Map for Planning, the Risk of Flooding from Surface Water mapping, and the Adur and Worthing Strategic Flood Risk Assessment (2024), ensuring that surface water flooding is afforded equal weight to fluvial and tidal sources, consistent with the PPG and recent case law.

4.35. Sites subject to higher flood risk, including Flood Zones 2 or 3, or equal or greater risk from surface water or other sources, have been excluded in accordance with the sequential approach. Other sites have been excluded where

they are not reasonably available, are already committed to extant permissions, form part of larger strategic or regeneration schemes, or cannot accommodate a comparable form of development due to scale, typology or physical constraints. These judgments have been applied consistently and proportionately across all sites considered.

4.36. The results of this assessment are presented in Appendix A, which provides a complete and transparent site-by-site analysis of every location identified through the Sequential Test search. Appendix A records the source, planning status, flood risk characteristics and the detailed, coded reasons for exclusion for each site, allowing the decision-maker to clearly audit how the Sequential Test has been applied in practice.

4.37. In summary, the Sequential Test has been prepared in full conformity with national policy, Planning Practice Guidance, the Council's adopted Sequential Test Methodology and the scope confirmed by the Local Planning Authority. It is based on up-to-date evidence, applies a structured and proportionate approach, and demonstrates that there are no reasonably available alternative sites within the defined area of search that would be at a lower risk of flooding and suitable for the proposed development.

5. The Exception Test

5.1. Having demonstrated through a site-specific Sequential Test that there are no reasonably available alternative sites at a lower risk of flooding within the defined area of search, the Exception Test is now considered in accordance with national planning policy.

5.2. Paragraph 177 of the National Planning Policy Framework (NPPF, December 2024) confirms that, where it is not possible for development to be located in areas with a lower risk of flooding (taking account of wider sustainable development objectives), the Exception Test may be required. The need for the Exception Test depends on the vulnerability of the proposed development and the nature of the flood risk affecting the site, having regard to the Flood Risk Vulnerability Classification set out in Annex 3 of the NPPF.

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Figure 3: Table 2 – Government planning practice guidance Flood Risk and Coastal Change

5.3. The proposed development comprises a single residential dwelling. Residential development is classified as 'More Vulnerable' in Annex 3 of the NPPF. Although the application site lies within Flood Zone 1 for fluvial and tidal flooding, it is identified as being at high risk of surface water flooding under both present-day and future climate change scenarios. This is confirmed by the site-specific Flood Risk Assessment and the Environment Agency's Risk of Flooding from Surface Water mapping.

5.4. National policy and the Planning Practice Guidance on Flood risk and coastal change confirm that the Sequential and Exception Tests must be applied having regard to all sources of flood risk, including surface water flooding, and not solely fluvial and tidal sources. Where a site is affected by significant surface water flood risk, the policy intent of the Exception Test is engaged, notwithstanding a Flood Zone 1 designation for rivers and the sea.

5.5. In this case, the depth and extent of modelled surface water flooding affecting the site, including predicted depths of approximately 0.2–0.3 metres under future climate change scenarios, are such that the application of the Exception Test is required in order to demonstrate that the development can be made acceptable in planning terms.

5.6. The Exception Test comprises two parts. It must be demonstrated that:

- the development will provide wider sustainability benefits to the community that outweigh the flood risk; and

- the development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall.

5.7. The following sections address each part of the Exception Test in turn, drawing on the findings of the Flood Risk Assessment, the proposed mitigation and drainage strategy, and the wider planning and sustainability context of the site.

(A) Wider Sustainability Benefits:

5.8. The proposed development delivers clear and demonstrable sustainability benefits when assessed against the objectives of sustainable development set out in Paragraph 8 of the National Planning Policy Framework. Those objectives include supporting economic growth, fostering strong and inclusive communities, and contributing to the protection and enhancement of the environment. The proposal also aligns with the spatial strategy and development principles of the Worthing Local Plan (adopted 2023), particularly those promoting efficient use of land, housing delivery within existing settlements, and climate-resilient development.

5.9. The site comprises a small, underutilised parcel of previously developed land within an established residential area. It benefits from immediate access to existing infrastructure, services and utilities, and is well integrated into the surrounding urban fabric. The location is served by frequent local bus routes and lies within walking distance of Worthing town centre and railway station, providing strong connectivity to employment, retail, education and leisure opportunities. This highly accessible location supports sustainable travel patterns and reduces reliance on private car use.

5.10. The proposal brings forward a high-quality new dwelling in an area of demonstrable housing demand. Although modest in scale, the development represents an efficient and effective use of land, contributing positively to local housing supply through appropriate infill and windfall development. In doing so, it avoids pressure on greenfield land, supports compact urban form, and reinforces the role of previously developed sites in meeting housing needs within the borough. The scale, layout and design of the proposal are compatible with the established character of the area and consistent with the Local Plan's objectives for managed, context-led growth.

5.11. The development will generate economic benefits during both construction and occupation. Construction activity will support local employment, including builders, specialist trades, suppliers and professional services. Once occupied, the development will contribute to the vitality of the local economy by supporting nearby shops, services and facilities within the town centre and surrounding neighbourhood. The site's location within an area prioritised for sustainable transport and regeneration further reinforces its suitability for inward investment and residential use.

5.12. Social benefits arise from the delivery of new housing within a well-served and accessible location. The site lies close to a wide range of community infrastructure, including schools, healthcare facilities, cultural and civic amenities, open spaces and employment areas. Locating new housing in such an accessible setting supports inclusive communities, reduces social isolation, and enables residents to meet day-to-day needs without reliance on long car journeys. The proposal contributes to a balanced housing mix within the existing urban area and supports patterns of development that are integrated rather than peripheral.

5.13. The scheme has been designed with environmental performance and climate resilience in mind. Measures include high standards of thermal performance to reduce operational energy demand, the use of durable and low-impact materials, and the incorporation of surface water management measures in accordance with sustainable drainage principles. The design also integrates flood-resilient construction measures, which enhance the long-term resilience of the building and reduce the potential burden on emergency services and public infrastructure during extreme weather events. The redevelopment of a constrained brownfield site further maximises land-use efficiency and avoids the environmental impacts associated with developing undeveloped land.

5.14. The site's urban infill location supports broader environmental objectives by minimising travel distances, encouraging walking and public transport use, and reducing car dependency. These factors align with wider policy objectives for compact, walkable neighbourhoods and sustainable patterns of growth.

5.15. Taken together, these considerations demonstrate that the proposed development delivers clear and tangible wider sustainability benefits across the economic, social and environmental dimensions of sustainable development. When weighed against the identified flood risk, and having regard to the mitigation measures proposed and assessed through the Flood Risk Assessment, these benefits are sufficient to satisfy the first limb of the Exception Test.

(B) Development will be Safe for its Lifetime:

5.16. The proposed development has been designed and assessed in accordance with the site-specific Flood Risk Assessment (FRA) prepared by Unda Consulting Limited (updated January 2026) and the accompanying surface water drainage strategy. The proposed layout and mitigation measures are reflected in the submitted architectural drawings and have been developed specifically to address the identified surface water flood risk affecting the site.

5.17. The FRA assesses flood risk from all relevant sources, with particular emphasis on surface water flooding under both present-day and future climate change conditions over the lifetime of the development. The assessment confirms that, with the proposed mitigation measures in place, the development can be made safe for its intended residential use without increasing flood risk elsewhere.

5.18. A key element of the mitigation strategy is the raising of finished floor levels. The internal finished floor level is set approximately 220 mm above existing ground level, with the main bedroom accommodation raised by a further 220 mm, resulting in a total internal elevation of approximately 440 mm above existing ground. This exceeds the modelled surface water flood depths of approximately 0.2–0.3 metres identified for the site under future climate change scenarios, providing an appropriate freeboard and ensuring that habitable accommodation remains above predicted flood levels.

5.19. Flood-resilient and flood-resistant construction measures are incorporated into the design to reduce potential damage and facilitate rapid recovery in the event of an extreme surface water flooding event. These measures include a concrete ground floor slab with waterproof membrane, the use of water-resistant materials and finishes at ground floor level, raised electrical sockets and services, and the installation of a non-return valve within the drainage system to prevent sewer backflow. Together, these measures enhance the resilience of the building and reduce the consequences of flooding should exceedance occur.

5.20. Surface water runoff from the site will be managed through a dedicated drainage strategy that accords with sustainable drainage principles. The strategy incorporates permeable surfacing and on-site attenuation to control runoff rates and volumes, with discharge limited to greenfield or better rates for events up to and including the 1 in 100 year rainfall event with an appropriate allowance for climate change. This ensures that the development will not increase surface water flood risk elsewhere and, where possible, contributes to better management of runoff when compared with the existing situation.

5.21. Safe access and egress have also been considered as part of the FRA. A pedestrian access route to higher ground has been identified via Rugby Road, which is shown by Environment Agency surface water mapping and FRA analysis to remain outside significant flood extents under both present-day and future climate change scenarios. This provides reassurance that occupants would be able to safely exit the site in the unlikely event of a severe surface water flooding incident.

5.22. In combination, these measures demonstrate that the development has been designed to remain safe for its lifetime, taking account of the vulnerability of its occupants and the effects of climate change. The proposed mitigation ensures that flood risk to people and property is appropriately managed, that flood risk elsewhere is not

increased, and that the development is resilient to future conditions. On this basis, the proposal satisfies the second limb of the Exception Test.

Exception Test Summary:

5.23. Based on the evidence presented in this report, both parts of the Exception Test, as set out in Paragraph 177 of the National Planning Policy Framework (December 2024), are considered to be fully satisfied.

5.24. **Part (A)** of the Exception Test requires demonstration that the proposed development provides wider sustainability benefits to the community that outweigh the identified flood risk. The proposal achieves this by delivering a compact, well-designed residential dwelling on a small parcel of previously developed land within the built-up area of Worthing. The site is highly accessible, well served by public transport, and located close to employment opportunities, services and facilities. The development makes efficient use of land, avoids greenfield release, supports compact urban form, and contributes positively to local housing supply through appropriate infill development. In doing so, it delivers clear economic, social and environmental benefits that align with the objectives of sustainable development set out in Paragraph 8 of the NPPF and with the spatial and sustainability objectives of the Worthing Local Plan (adopted 2023).

5.25. **Part (B)** of the Exception Test requires demonstration, through a site-specific Flood Risk Assessment, that the development will be safe for its lifetime, taking account of climate change and the vulnerability of its occupants, without increasing flood risk elsewhere and, where possible, reducing flood risk overall. This requirement has been met through the submission of a robust Flood Risk Assessment and supporting surface water drainage strategy, which inform the proposed layout and design of the development. Key mitigation measures include raised finished floor levels providing appropriate freeboard above modelled surface water flood depths, the incorporation of flood-resilient and flood-resistant construction techniques, on-site surface water attenuation and controlled discharge in accordance with sustainable drainage principles, and the identification of a safe pedestrian access and egress route to higher ground that remains outside significant flood extents under both present-day and future climate change scenarios. Together, these measures ensure that flood risk to people and property is appropriately managed and that the development will not increase flood risk elsewhere.

5.26. The proposed approach is consistent with the Worthing Local Plan's treatment of flood risk and sustainability. Paragraph 4.125 of the Local Plan states that:

> *"Where sites have passed the Sequential Test, they have been assessed against the objectives of the Sustainability Appraisal to determine whether the sustainability benefits to the community outweigh flood risk as part of the Exception Test. The sites that demonstrate these wider benefits and have also shown, under Part 2 of the Exception Test, that flood risk on the site can potentially be managed without increasing flood risk elsewhere have been allocated in this plan."*

5.27. Although the application site is not a strategic allocation, it has been subjected to an equally rigorous Sequential and Exception Test process at the application stage, using the most up-to-date national and local policy, guidance and flood risk evidence. The assessment demonstrates that the proposal delivers wider sustainability benefits and can be made safe for its lifetime without increasing flood risk elsewhere. On this basis, the Exception Test is satisfied in full.

6. Conclusion

6.1. Unda Consulting Limited has been appointed by Stag Construction Services Ltd to prepare a Sequential and Exception Test in support of a planning application for the construction of a single residential dwelling at 9 Station Parade, Tarring Road, Worthing, West Sussex, BN11 4SS.

6.2. The assessment has been undertaken in full accordance with the National Planning Policy Framework (NPPF, December 2024), the Planning Practice Guidance on Flood risk and coastal change (updated September 2025), and the Adur & Worthing Councils' Sequential Test Methodology: Guidance for Planning Applications (July 2024). The Worthing Local Plan (2020–2036, adopted March 2023) and the Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024) have informed the assessment throughout.

6.3. The requirement for a Sequential Test, and the scope and methodology for undertaking it, were confirmed by the Local Planning Authority during pre-determination correspondence. Written advice from the Council's Principal Planning Officer confirmed that, due to the site's identification as being at high risk of surface water flooding, a site-specific Flood Risk Assessment and Sequential Test would be required, and that the area of search should comprise the administrative area of Worthing Borough. The advice also confirmed the appropriate evidence base to be used, including the SHLAA, Housing Land Supply Position Statement, market listings, the SFRA and Environment Agency flood mapping. The Sequential Test has been prepared directly in response to that advice.

6.4. Although the application site lies within Flood Zone 1 for fluvial and tidal flooding, it is identified by both the Environment Agency's Risk of Flooding from Surface Water mapping and the SFRA as being subject to high surface water flood risk. In accordance with national policy and guidance, this triggers the requirement for the application of the Sequential Test and, where necessary, the Exception Test at the planning application stage.

6.5. The Sequential Test has been undertaken using a clearly defined and proportionate area of search corresponding to the administrative area of Worthing Borough, consistent with the Planning Practice Guidance, the Council's adopted methodology, and the scope confirmed by the Local Planning Authority. Potential alternative sites were identified using a comprehensive and up-to-date evidence base, including the Strategic Housing Land Availability Assessment, the Housing Land Supply Position Statement (April 2024), the Brownfield Land Register, the Council's planning register, and a review of publicly available market listings. The market-facing element of the search was updated immediately prior to submission to ensure that current site availability was captured.

6.6. Every site identified through the Sequential Test search has been assessed individually and systematically against availability, suitability, planning status, scale and flood risk from all relevant sources. The results of this assessment are presented in Appendix A, which provides a complete and transparent site-by-site analysis of all locations considered, supported by a structured exclusion-code system that records the specific reasons for exclusion in each case. The Sequential Test demonstrates that sites were excluded for reasons including higher or equal flood risk, lack of availability or deliverability, incompatibility in scale or typology, and physical or policy constraints. No reasonably available alternative sites at a lower risk of flooding from all sources were identified that could accommodate a comparable form of residential development within a similar timeframe. The proposal at 9 Station Parade therefore passes the Sequential Test.

6.7. The Exception Test is required due to the classification of the proposed residential development as 'More Vulnerable' and the presence of high surface water flood risk affecting the site. Both parts of the Exception Test have been satisfied.

6.8. The first part of the Exception Test is met through the delivery of wider sustainability benefits that outweigh the identified flood risk. The development brings a small parcel of previously developed land back into beneficial use within an established and highly accessible urban area. It contributes positively to housing delivery through appropriate infill development, supports compact and sustainable patterns of growth, and aligns with the economic, social and environmental objectives of sustainable development set out in Paragraph 8 of the NPPF and the spatial strategy of the Worthing Local Plan.

6.9. The second part of the Exception Test is satisfied through the submission of a detailed Flood Risk Assessment and supporting surface water drainage strategy (updated January 2026), which demonstrate that the development can be made safe for its lifetime, taking account of climate change and the vulnerability of its occupants. The proposed design incorporates raised finished floor levels providing appropriate freeboard above modelled surface water flood depths, flood-resilient and flood-resistant construction measures, sustainable drainage with on-site attenuation and controlled discharge, and a safe pedestrian access and egress route to higher ground that remains outside significant flood extents under present-day and future climate change scenarios. These measures ensure that flood risk to people and property is appropriately managed and that the development will not increase flood risk elsewhere.

6.10. In summary, the proposed development at 9 Station Parade:

- has been assessed using a Sequential and Exception Test methodology agreed in principle with the Local Planning Authority;
- satisfies the Sequential Test through a robust, transparent and policy-compliant site search and assessment;
- meets both parts of the Exception Test by delivering wider sustainability benefits and demonstrating safety for the lifetime of the development; and
- accords with national planning policy, Planning Practice Guidance, and the adopted local policy framework.

On this basis, the proposed development is considered acceptable in flood risk terms and compliant with both national and local planning policy. It is therefore recommended that the application be supported.

Unda Consulting Limited
January 2026

Appendix

Table A1: Sequential Test Site Search and Assessment

Table A1 presents the full site-by-site Sequential Test assessment undertaken for this proposal. It includes all potentially relevant residential sites identified within the defined area of search and forms an integral part of the evidence base for the Sequential Test.

The table draws on the following sources:

- sites identified through the Strategic Housing Land Availability Assessment (SHLAA);
- sites listed on the Brownfield Land Register; and
- additional sites identified through targeted online searches of publicly advertised residential land and plots, including local estate agents and national property portals.

Each site has been individually assessed and reported in Table A1 against consistent criteria, including availability, suitability, planning status, scale, and flood risk from all relevant sources. The table records the specific reasons for exclusion using the defined exclusion-code system and provides a transparent and auditable record of how the Sequential Test has been applied in practice.

Table A1 should therefore be read as the complete analytical record of the Sequential Test site search, rather than as a summary, and supports the conclusions reached in the main body of the report.

Table A1

Ref	Site Name / Address	Source	Flood Risk Summary	Exclusion Codes	Detailed Reason for Exclusion
BLR-001	14–20 Windsor Road, Worthing BN11	Brownfield Land Register	Flood Zone 1; surface water risk identified	**E3, E9**	Although identified on the Brownfield Land Register, there is no evidence that this site is currently available for independent development. The site is associated with an existing hotel use and would require a comprehensive redevelopment or change of use rather than delivery of a single dwelling. Subdivision to accommodate a single unit would not represent a realistic or comparable alternative within a similar timeframe.
SALE-001	19 Reigate Road, Worthing BN11 5NE	SHLAA / Planning Register	Flood Zone 1; low surface water risk	**E5, E9**	The site benefits from an implemented planning permission for a multi-unit residential scheme. The development is committed and cannot reasonably accommodate an alternative single-dwelling proposal. It therefore does not represent a reasonably available alternative site.
SALE-002	Land at 7 Upper Brighton Road, Worthing BN14	Market listing	Flood Zone 1; surface water risk present	**E3, E4**	Although marketed, the site is constrained by access and layout limitations. No planning permission is in place, and there is no evidence that a single dwelling could be delivered safely and policy-compliantly without reliance on further land assembly or access arrangements. Availability and deliverability within a comparable timeframe are therefore uncertain.
SALE-003	3 Woodside Road, Worthing BN11	Market listing	Flood Zone 1; surface water risk present	**E5**	The site has been subject to a recent planning refusal and there is no evidence of an active or forthcoming revised proposal. It therefore represents a stalled or constrained site and cannot be regarded as reasonably available.
SALE-004	Land adjacent to 1 Grafton Road, Worthing	Market listing	Flood Zone 1; medium surface water risk	**E2, E4**	The site is subject to equal or greater surface water flood risk compared with the application site and is constrained by access and servicing limitations. It does not represent a sequentially preferable or deliverable alternative.
SALE-005	Rear of 24 George V Avenue, Worthing BN11	OnTheMarket	Flood Zone 1; medium surface water risk	**E2, E3**	Although marketed, the site is affected by comparable surface water flood risk and there is no clear evidence that it is genuinely available for independent development. Planning status remains uncertain and delivery within a comparable timeframe cannot be demonstrated.
SHLAA-001	Land at 1–3 Brighton Road, Worthing BN11	SHLAA	Flood Zone 1; medium surface water risk	**E2, E3**	The site is identified as having surface water flood risk comparable to the application site. There is no evidence of current availability or intent to bring the site forward for development, and it therefore fails both the availability and sequential preference tests.
SHLAA-002	54 Homefield Road, Worthing BN11	SHLAA	Flood Zone 1; medium surface water risk	**E3, E7**	The site is not actively available and is constrained in size and form. There is insufficient space to deliver a compliant dwelling with appropriate access, parking and amenity space without unacceptable impacts.
SHLAA-003	Tarring Road Car Park, Worthing	SHLAA	Flood Zone 1; medium surface water risk	**E1, E6**	This is a public car park forming part of local infrastructure provision. There is no indication of release for residential development, and any redevelopment would conflict with its safeguarded function. It is not reasonably available.
SHLAA-004	Lyndhurst Road Car Park, Worthing	SHLAA	Flood Zone 1; medium surface water risk	**E1, E6**	As with other public car parks, the site is safeguarded for operational use. There is no evidence of availability, and it cannot be treated as a realistic alternative for a single dwelling.

SHLAA-005	14–18 Portland Road, Worthing BN11	SHLAA	Flood Zone 1; medium surface water risk	**E3, E9**	No evidence exists that the site is available for development. The site would require a coordinated redevelopment strategy rather than delivery of a single dwelling, making it unsuitable as a comparable alternative.
SHLAA-006	Rear of 5–11 Chapel Road, Worthing	SHLAA	Flood Zone 1; medium surface water risk	**E3, E7**	Backland site with constrained access and plot geometry. No evidence of availability, and physical constraints would prevent compliant development of a dwelling.
SHLAA-007	Rear of 28–32 High Street, Worthing	SHLAA	Flood Zone 1; medium surface water risk	**E3, E7**	The site is backland, tightly constrained and not marketed. Access and layout limitations would prevent safe and policy-compliant development.
SHLAA-008	Rear of 19–25 Chapel Road, Worthing	SHLAA	Flood Zone 1; medium surface water risk	**E3, E7**	As above, the site is constrained, not available, and incapable of accommodating a compliant dwelling.
SHLAA-009	Rear of 37–41 Chapel Road, Worthing	SHLAA	Flood Zone 1; medium surface water risk	**E3, E7**	The site lacks demonstrable availability and is constrained by access and surrounding development, rendering it unsuitable.
SHLAA-017	31 West Buildings, Worthing BN11	SHLAA	Flood Zone 1; medium surface water risk	**E5, E9**	The site benefits from planning permission for a flatted development. It is committed and cannot reasonably accommodate a single dwelling.
SHLAA-019	Stagecoach Bus Depot, Worthing	SHLAA	Flood Zone 3; high surface water risk	**E2, E9**	The site is subject to significantly higher flood risk and forms part of a large-scale redevelopment opportunity. It is neither sequentially preferable nor comparable in scale.
SHLAA-020	Teville Gate, Worthing	SHLAA	Flood Zone 1; low surface water risk	**E1, E9**	This is a strategic regeneration site with a complex delivery strategy. A single dwelling could not be delivered independently or within a comparable timeframe.
SHLAA-022	Union Place, Worthing	SHLAA	Flood Zone 1; low surface water risk	**E1, E6, E9**	Council-owned strategic site intended for comprehensive redevelopment. Not available or suitable for independent single-dwelling delivery.
SALE-011	Bedford Row, Worthing BN11	Market listing	Flood Zone to be screened; urban SW risk	**E3, E9**	Recently marketed land opportunity. Planning status unconfirmed and no evidence of realistic delivery of a single dwelling within a comparable timeframe.
SALE-012	Park Road, Worthing BN11	Market listing	Flood Zone to be screened; urban SW risk	**E3, E4**	Plot marketed with unclear access and servicing arrangements. Suitability and deliverability remain uncertain.
SALE-013	Arundel Road, Worthing BN13	Market listing	Flood Zone to be screened; urban SW risk	**E2, E3**	Marketed site subject to equal or greater flood risk and no confirmed planning position. Does not represent a sequentially preferable alternative.

SALE-014	Shandon Road, Worthing BN14	Market listing	Flood Zone to be screened; urban SW risk	**E3, E7**	Constrained plot with unclear availability and limited capacity to deliver a compliant dwelling.

Sequential Test Methodology and Exclusion Codes

The Sequential Test has been undertaken in accordance with the National Planning Policy Framework (NPPF, December 2024) and the Planning Practice Guidance (PPG): *Flood risk and coastal change* (updated September 2025). The assessment applies the risk-based, all-sources approach required by the PPG and is proportionate to the scale and nature of the proposed development at 9 Station Parade, Tarring Road, Worthing.

The methodology reflects the adopted local planning policy framework, including the Worthing Local Plan (2020–2036, adopted March 2023), the Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024), and the Councils' Sequential Test Methodology (July 2024).

A comprehensive search of potentially available residential sites has been undertaken across the administrative area of Worthing Borough, which represents the agreed and appropriate geographical scope for the Sequential Test. The assessment focuses on sites that could realistically accommodate a comparable form of residential development within a similar timeframe, in line with the proportionality principles set out in the PPG.

Each site identified through the search process has been assessed consistently against flood risk, suitability, availability and deliverability criteria. The assessment applies the PPG definitions of "reasonably available", "suitable for the same type and scale of development", and "appropriate area of search", taking account of all sources of flood risk, including surface water flooding.

Data sources used in the assessment are identified in the site search table and include the Strategic Housing Land Availability Assessment, the Housing Land Supply Position Statement (April 2024), the Brownfield Land Register, the Environment Agency Flood Map for Planning, the Risk of Flooding from Surface Water mapping, the Adur and Worthing SFRA (2024), the Council's online planning register, and publicly available land-for-sale and plot listings. This ensures comprehensive coverage of potential alternative sites within the defined area of search.

Sites have been screened using a transparent exclusion-code system ("E-codes"), allowing clear, consistent and traceable reasons for exclusion to be recorded. This approach ensures that judgments are applied consistently across all sites and that the Sequential Test can be clearly understood and audited by the decision-maker.

Exclusion Code Key (with Policy Alignment)

E1 – Strategic or Multi-Unit Allocation
The site forms part of a strategic allocation or larger multi-dwelling scheme. Sub-division to deliver a single dwelling independently would conflict with the intended scale, phasing or delivery strategy. This does not represent a suitable or realistic alternative for a single-dwelling proposal, contrary to the PPG requirement for comparable type and scale and the sequential approach set out in the NPPF.

E2 – Equal or Higher Flood Risk
The site is subject to the same or a greater level of flood risk from one or more sources (including surface water, groundwater, sewer or residual risk) when compared with the application site. This does not represent a sequentially preferable alternative in accordance with the PPG all-sources approach and NPPF paragraph 174.

E3 – Not Reasonably Available
There is no evidence that the site is genuinely available for development within a comparable timeframe. This includes sites that are owner-occupied, not marketed, subject to unresolved ownership constraints, or otherwise unavailable. This fails the availability test set out in the PPG.

E4 – Physical or Access Constraint
Physical constraints such as inadequate or unsafe access, constrained plot geometry, inability to provide required parking, servicing or turning, or unresolvable infrastructure constraints prevent safe and policy-compliant development. This fails the suitability and deliverability requirements of the PPG and relevant design policies of the Worthing Local Plan.

E5 – Implemented or Committed Development
The site benefits from an extant planning permission that has been implemented, is under construction, or is otherwise committed and cannot realistically come forward within a comparable timeframe. Such sites do not represent reasonably available alternatives.

E6 – Policy Designation or Conflict
The site is subject to planning policy designations or safeguards that prevent residential development, such as protected open space, employment land, or land outside the settlement boundary. This conflicts with the Worthing Local Plan spatial strategy and does not represent a suitable alternative.

E7 – Sub-Threshold Plot Size or Form
The site is too small, constrained, or irregular in form to accommodate a single dwelling with compliant access, amenity space, separation distances and parking. This fails the PPG suitability test and NPPF design requirements.

E8 – Other Site-Specific Constraint
Site-specific constraints such as heritage impacts, ecological designations, ransom strips, contamination, or unresolvable servicing issues would prevent delivery of a comparable residential scheme within the same timeframe. This fails the deliverability test in the PPG.

E9 – Scale or Type Mismatch
The site could only accommodate a materially different form of development, such as a larger flatted scheme, mixed-use development, or non-residential use, and therefore cannot reasonably accommodate a proposal of comparable type and scale. This conflicts with the PPG requirement for like-for-like comparison.

E10 – Not Lower Risk Across All Sources
Although fluvial flood risk may be low, the site is subject to equal or greater risk from surface water, groundwater, sewer surcharge or other flood mechanisms. A site must represent a genuinely safer alternative when assessed across all relevant sources of flood risk.