Sequential and Exception Test for Planning

May 2025

Prepared for:

Stag Construction Services Ltd

Location:

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

Our reference:

95586-Boys-StationRd ST v1.0 190525

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Document Issue Record

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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 their 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.

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 national planning policy.

1.4. Paragraph 180 of the National Planning Policy Framework (NPPF, 2024) states 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."

1.5. 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. Sites considered during the sequential assessment are detailed in Appendix A of this report.

1.6. Although the site lies within Flood Zone 1 for fluvial and tidal risk, mapping published by the Environment Agency (EA) and referenced in the accompanying Flood Risk Assessment (prepared by Unda, May 2025) identifies the site as being at high risk of surface water flooding, both in the present day and under future climate change scenarios. As per Planning Practice Guidance and local policy, this triggers the requirement for a Sequential Test to ensure that more appropriate, lower-risk sites are not reasonably available 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 Ltd (Ref: 95586-Boys-StationRd, May 2025) to support the proposed development at 9 Station Parade. The FRA assesses all relevant sources of flood risk and proposes mitigation measures to ensure the development remains safe for its lifetime, taking climate change into account.

Flood Zone Classification

2.2. The site lies within Flood Zone 1, as defined by the Environment Agency's Flood Map for Planning. This classification denotes land having a less than 1 in 1,000 annual probability of river or sea flooding. However, it is recognised in national guidance that the Sequential Test must consider all sources of flood risk—not just fluvial and tidal.

2.3. The requirement for the Sequential Test in this case arises due to the site being located within an area of high surface water flood risk, as identified by the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps and confirmed by the 2024 Worthing Strategic Flood Risk Assessment (SFRA).

Tidal/Fluvial Flood Risk

2.4. There is no identified risk of fluvial or tidal flooding. The site is:

- Over 1 km from the English Channel;
- Located in an area with no EA flood defences;
- Not within a flood storage area;
- Not affected by residual risk from overtopping or breach, due to its inland location and lack of adjacent formal defences.

Surface Water Flooding

2.5. The RoFSW mapping indicates the site is at high risk of surface water flooding under both present day and future climate scenarios (2040–2060):

- Depths of 0.2m–0.3m across parts of the site, including the proposed building footprint;
- These extents and depths persist or intensify slightly under future climate modelling;
- Flood hazard mapping shows potential risk along access routes during heavy rainfall events.

Groundwater, Sewer and Other Sources

2.6. **Groundwater Flooding:** The 2024 Worthing SFRA shows groundwater within 5m of the surface, but no historical flooding is recorded.

2.7. **Sewer Surcharge:** Three historic incidents are noted in the BN11 4 postcode area, but none directly linked to the application site.

2.8. **Reservoir Flooding:** The site lies outside of any mapped reservoir breach zone. Risk is negligible.

Proposed Mitigation Measures

2.9. The FRA proposes the following to ensure flood risk is appropriately mitigated:

- Finished Floor Level (FFL) raised by 220mm above existing ground, with an additional 220mm for the bedroom (total elevation: 440mm);
- Flood resilient construction measures, including:
    - Waterproof membranes and render;
    - Raised electrical outlets and meters;
    - Flood-resistant doors and non-return valves;
    - Resilient ground floor materials and construction detailing;
- Safe access route identified via Valencia Road to Rugby Road, shown to be outside of significant surface water risk even under climate change allowances;
- Occupants will be advised to register for the National Severe Weather Warning Service and implement a site-specific flood warning and evacuation plan.

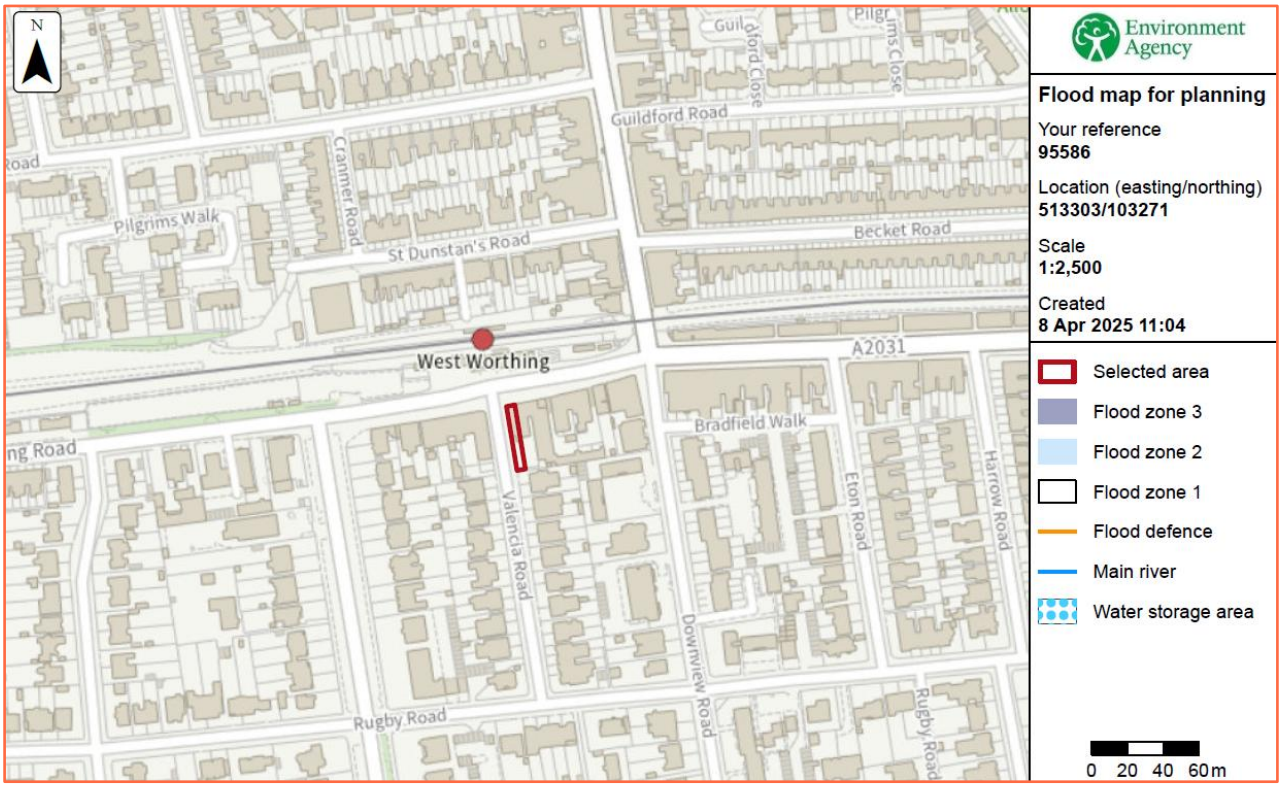

Figure 1: EA Environment Agency Flood Map for Planning (Rivers and Sea) (Source: EA)

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 it should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 178).

3.2. Local Planning Authorities (LPA) are encouraged to take a risk-based approach to development proposals in or affecting flood risk areas through the application of the ST.

3.3. The NPPF Paragraph 174 states:

> *"The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding"*

3.4. Paragraph 175 states:

> "*The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).*"

3.5. Paragraph 177 states:

> "*Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.*"

3.6. The phrase "*reasonably available*" is key to Paragraph 174 and Government Planning Practice Guidance "Flood risk and coastal change" provides additional guidance on this.

> *The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test. Other forms of flooding need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so that the sequential approach can be applied across all areas of flood risk.*
>
> *Paragraph: 023 Reference ID: 7-023-20220825*
>
> *The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not*

possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- *Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.*

Initially, the presence of existing flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain. Climate change will also impact upon the level of protection infrastructure will offer throughout the lifetime of development. The Sequential Test should then consider the spatial variation of risk within medium and then high flood risk areas to identify the lowest risk sites in these areas, ignoring the presence of flood risk management infrastructure.

It may then be appropriate to consider the role of flood risk management infrastructure in the variation of risk within high and medium flood risk areas. In doing so, information such as flood depth, velocity, hazard and speed-of-onset in the event of flood risk management infrastructure exceedance and/or failure, should be considered as appropriate. Information on the probability of flood defence failure is unsuitable for planning purposes given the substantial uncertainties involved in such long-term predictions.

Paragraph: 024 Reference ID: 7-024-20220825

3.7. Table 2 of the NPPF classifies Flood Risk Vulnerability for residential buildings as 'more vulnerable'. Table 3 of the NPPF shows that 'more vulnerable' developments require that the Sequential Test is passed for development to be acceptable.

3.8. Table 2 of the NPPF classifies flood risk vulnerability for residential buildings as 'more vulnerable'. Table 3 confirms that 'more vulnerable' development located within Flood Zone 3a must satisfy both the Sequential Test and the Exception Test to be considered acceptable in planning terms. As the application site is not allocated in the Selby Local Plan, the Sequential Test must be undertaken at the application stage. The Exception Test is also required and is addressed in the following section.

Local Policy:

3.9. 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 (adopted March 2023), which is supported by the Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024) and the Sequential Test Methodology Guidance (July 2024).

3.10. These documents establish a local planning framework that aligns with the NPPF, emphasising a risk-based approach to directing development away from areas at highest flood risk, and applying the Sequential Test (and, where necessary, the Exception Test) where development is proposed in areas of identified flood risk, including surface water.

3.11. The Worthing Local Plan (2023) includes several policies that directly inform the preparation of this assessment. Strategic Objective 6 seeks to:

> *"Ensure that development is designed to respond to climate change, including minimising the risk from flooding, improving water efficiency and promoting the use of sustainable drainage systems."*

3.12. Policy DM18: Flood Risk and Sustainable Drainage confirms that:

> *"Development will be directed away from areas at risk of flooding in accordance with the Sequential Test. Where development is necessary in such areas, it must be demonstrated that it is safe, will not increase flood risk elsewhere and incorporates appropriate mitigation and sustainable drainage systems."*

3.13. The policy also notes that:

> *"A site-specific Flood Risk Assessment must accompany proposals in areas at risk from any source of flooding, including surface water,"*

3.14. and requires that:

> *"Relevant evidence from the Adur and Worthing Strategic Flood Risk Assessment and surface water mapping… including climate change considerations" be taken into account.*

3.15. The Adur and Worthing Strategic Flood Risk Assessment (SFRA, 2024) forms part of the local evidence base. It maps flood risk from rivers, the sea, surface water, sewers and groundwater, and includes updated hazard and depth mapping under climate change scenarios. The SFRA identifies 9 Station Parade, Tarring Road, as lying within an area of "high surface water flood risk" in both the present day and between 2040–2060. This risk classification directly informs the requirement for a Sequential Test, despite the site's location in Flood Zone 1 for fluvial and tidal risk.

3.16. In support of this, the Councils' Sequential Test Methodology (2024) provides guidance for undertaking proportionate Sequential Tests. It confirms that:

> *"Applicants must provide robust evidence that there are no suitable alternative sites at lower risk of flooding that could accommodate the proposed development type and footprint within the defined search area."*

3.17. The document also emphasises that:

> *"The use of SFRA mapping to assess surface water flood risk should be treated with the same level of scrutiny as river or tidal flooding."*

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

Legal Considerations:

3.19. The preparation of this Sequential Test has been undertaken with reference to recent legal precedent, in particular the Court of Appeal's judgment in Mead Realisations Ltd v Secretary of State for Levelling Up, Housing and Communities [2024] EWCA Civ 18. This case provides important clarification on the status and interpretation of the government's Planning Practice Guidance (PPG), and its relationship with the National Planning Policy Framework (NPPF).

3.20. In the Mead case, the Court of Appeal held that:

> *"The Planning Practice Guidance is not merely a set of optional or advisory notes, but carries significant weight and should be interpreted in line with the policy intentions of the NPPF."*

3.21. The ruling emphasised that both the NPPF and PPG must be read together, and that decision-makers must treat PPG content as material to the application of planning policy — particularly in complex or borderline flood risk scenarios.

3.22. This has direct relevance to the application site at 9 Station Parade, where the Sequential Test is triggered by surface water flood risk, rather than fluvial or tidal sources. As the PPG explicitly states:

"The Sequential Test should be applied to all sources of flooding, including surface water, groundwater and sewer flooding, in addition to fluvial and tidal risk."
(PPG: Flood risk and coastal change, Paragraph: 019 Reference ID: 7-019-20220825)

3.23. The Mead judgment reinforces that this guidance has the same weight as policy, and therefore must be properly applied when considering development proposals in high surface water risk areas — even those located within Flood Zone 1.

3.24. In this context, the legal precedent strengthens the position taken by Worthing Borough Council in requiring a Sequential Test for the proposed development. It also supports the methodology followed in this report, which draws on the most up-to-date surface water flood risk evidence (EA RoFSW mapping and the 2024 Worthing SFRA), consistent with both national guidance and case law.

3.25. In summary, the legal context confirms that the Sequential Test for this site must be conducted with full regard to surface water risk and climate change, and that local and national guidance documents — including the PPG — carry binding material weight in the assessment of flood risk and site suitability.

4. The Sequential Test

Guidance:

4.1. The approach to this Sequential Test has been informed by the Government's Planning Practice Guidance (PPG) on "Flood risk and coastal change", which provides clear direction on how the Sequential Test should be applied to planning applications.

4.2. The relevant guidance confirms that the Sequential Test should be applied to both major and non-major development where there is a known flood risk. This includes areas at risk from surface water flooding, even if they fall within Flood Zone 1 for fluvial and tidal sources.

4.3. The PPG (Paragraph: 027 Reference ID: 7-027-20220825) states:

> *'The Sequential Test should be applied to 'Major' and 'Non-major development' proposed in areas at risk of flooding, but it will not be required where:*
>
> - *The site has been allocated for development and subject to the test at the plan making stage (provided the proposed development is consistent with the use for which the site was allocated and provided there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test).*
> - *The site is in an area at low risk from all sources of flooding, unless the Strategic Flood Risk Assessment, or other information, indicates there may be a risk of flooding in the future.*
> - *The application is for a development type that is exempt from the test, as specified in footnote 56 of the National Planning Policy Framework.*
>
> *For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. Equally, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.*
>
> *For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary.'*
>
> Paragraph: 027 Reference ID: 7-027-20220825

4.4. In this case, the proposed development is a non-major residential scheme comprising a single dwelling. While the site lies within Flood Zone 1 for fluvial and tidal flooding, it is located in an area of high surface water flood risk, as confirmed by both the Environment Agency RoFSW mapping and the 2024 Adur and Worthing Strategic Flood Risk Assessment. Accordingly, the Sequential Test must be applied, in line with both national guidance and the local planning policy framework.

4.5. 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 development is not exempt under footnote 56 of the NPPF. Therefore, a full Sequential Test is required at the application stage.

4.6. In addition to national policy, this assessment has followed the approach set out in the Adur & Worthing Sequential Test Methodology: Guidance for Planning Applications (July 2024). This local guidance confirms that the Sequential Test should apply to all sources of flood risk and reinforces the need to use a proportionate, evidence-led approach.

4.7. The methodology states:

> *"Applicants must demonstrate there are no reasonably available alternative sites at lower risk of flooding that could accommodate the proposed development, and that the Sequential Test has been applied using robust and up-to-date evidence, including the latest SFRA and Environment Agency mapping."*
>
> (Section 3.1)

4.8. It also confirms:

> *"The Sequential Test applies to all sources of flood risk, including fluvial, tidal, surface water, groundwater and sewer flooding."*
>
> (Section 1.2)

4.9. For smaller-scale residential schemes, such as the proposed development, the methodology recommends that the area of search should typically be confined to the built-up area boundary of Worthing, unless a broader catchment is justified based on the functional requirements of the proposal.

4.10. The Sequential Test must therefore consider any suitable and available sites within this defined area that could accommodate a comparable form of residential development and are at lower flood risk, based on all available data sources.

4.11. Supporting this, the Adur and Worthing Strategic Flood Risk Assessment (SFRA), 2024 identifies surface water flooding as a significant concern within the borough, noting that:

> *"Surface water flooding is the most common source of flood risk across the study area... with significant areas of Worthing shown to be at high risk under both present-day and future climate change conditions."*
>
> (SFRA, Section 6.2)

4.12. Specifically, the SFRA confirms that parts of Tarring Road, including the application site, fall within surface water hazard zones with modelled flood depths of 0.2–0.3m, which persist under climate change scenarios. This reinforces the requirement for the Sequential Test to consider surface water as a material source of risk.

4.13. The following sections define the area of search and present the assessment of alternative sites in accordance with this national and local guidance.

Sequential Test Considerations:

4.14. The proposed development is not part of an allocated site in the Worthing Local Plan (2023). Therefore, it cannot be assumed that the Sequential Test has previously been satisfied, and it must be applied in full at the planning application stage.

4.15. The proposal involves the construction of a single new residential unit on a previously developed urban site. Residential development is classified as 'more vulnerable' under the NPPF's flood risk vulnerability classification. While the site lies within Flood Zone 1 for fluvial and tidal flood risk, it has been identified in both the Adur and Worthing Strategic Flood Risk Assessment (2024) and EA surface water mapping as being at high risk of surface water flooding, with predicted flood depths of up to 0.3m.

4.16. As such, and in line with both national guidance and the Sequential Test Methodology (2024), the Sequential Test must be applied. It must demonstrate that there are no reasonably available sites at lower risk of flooding from any source that could accommodate the proposed development

Sequential Test Search:

4.17. The applicant has undertaken a thorough and proportionate search for alternative sites within the built-up area of Worthing to support the Sequential Test. This assessment utilised a 3km search radius as a proxy for local housing need and was undertaken in accordance with the Adur & Worthing Councils' Sequential Test Methodology (2024).

The search covered the full extent of the Adur & Worthing Strategic Housing Land Availability Assessment (SHLAA, 2023), the Brownfield Land Register (BLR, 2023), and publicly available residential land listings from estate agents including Rightmove, Zoopla, and OnTheMarket. The results of the assessment are summarised in Appendix A (Table A1).

4.18. The SHLAA yielded a wide range of sites, many of which were assessed and excluded due to flood risk or unavailability. For example:

- Stagecoach Bus Depot, Library Place (SHLAA-004) and Grafton Car Park, Augusta Place (SHLAA-009) both fall within Flood Zone 3 and were excluded on that basis.
- Gas Holder Station, Lyndhurst Road (SHLAA-005) and Land West of Fulbeck Avenue (SHLAA-010), while in Zone 1, are large, contaminated or constrained regeneration sites with no current availability for independent residential schemes.
- Several sites such as Teville Gate (SHLAA-002) and Union Place (SHLAA-003) are strategic allocations already subject to major town centre regeneration and were therefore excluded as they are not comparable in scale or typology.

4.19. The BLR provided a smaller number of sites. The only BLR site within the search area, Land between 76 and 78a Brighton Road, Lancing (BLR-001), lies outside Worthing's administrative boundary and was excluded on geographic grounds. No BLR sites within Worthing remained both suitable and available.

4.20. A focused review of residential land listings on public portals was also undertaken. Several candidate sites were identified, including:

- 14–20 Windsor Road (SALE-001 & SALE-002) – two separate listings for a former hotel, with prior approval for 9 flats. This was excluded as the proposal involved conversion, not new-build, and is not comparable in scale or typology.
- Pavilion Road (SALE-005) – a vacant infill plot potentially suitable for one dwelling but with no planning permission and unclear deliverability.
- Land adjacent to 36 The Plantation (SALE-006) – a plot with full planning permission for a single dwelling in Flood Zone 1, but of a different typology and potentially unavailable.

4.21. Each of the agent-sourced sites was reviewed against EA flood risk mapping. Some, like Land at Mill Road and Grand Avenue, were granted consent for large detached homes, but were either not available or outside the applicant's development profile in terms of scale, market type, or viability.

4.22. Across all sources, sites were excluded where:

- They lay within Flood Zone 2 or 3, such as Stagecoach Depot or Grafton MSCP.
- They were already approved or built out, including Jupps Garage (SHLAA-015), 42–46 Teville Road (SHLAA-011), and 19 Reigate Road (SHLAA-016).
- They were not suitable in scale, such as large strategic allocations like Centenary House (SHLAA-012) or Northbrook College Canteen (SHLAA-017).
- They were unavailable, including Council-led or institutional sites with no prospect of sale.

4.23. This evidence demonstrates that, within the defined area of search, no reasonably available sites at lower flood risk exist that could accommodate a scheme of a similar scale and type. The application site at 9 Station Parade remains the most sequentially appropriate location when assessed against current guidance.

Conformity with Sequential Test Methodology:

4.24. 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.

4.25. A proportionate area of search has been defined, consistent with the scale and type of development proposed — namely, a single residential unit. The methodology recommends that, for minor residential development, the area of search should be confined to the Worthing built-up area. This has been approximated using a 3km radius around the application site, which captures a realistic range of alternative sites within the local context.

4.26. A comprehensive evidence base has been used to identify potentially suitable and available sites. This includes:

- The Adur & Worthing Strategic Housing Land Availability Assessment (SHLAA, 2023);
- The Brownfield Land Register (BLR, 2023); and
- Publicly advertised residential plots from agents via Rightmove, Zoopla, and OnTheMarket.

4.27. Each site has been assessed against key Sequential Test criteria including:

- Site suitability for residential use;
- Availability (including whether the site is in active use or constrained by lease or allocation);
- Planning status (extant permissions, refusals, or strategic allocation);
- Flood risk (both fluvial/tidal and surface water) using the EA Flood Map for Planning and Long-Term Flood Risk Map.

4.28. Sites located in Flood Zones 2 or 3 have been excluded in accordance with the principle of directing development to the lowest-risk areas. Sites with medium or high surface water risk have been considered with equal weight, in line with recent legal precedent and updated PPG.

4.29. The Sequential Test also includes a comprehensive site table (Appendix A, Table A1), which presents the evidence transparently and allows for clear audit of the decision-making process. Each site entry includes a standardised reference code, source, planning status, flood zone, surface water risk, and a reasoned justification for inclusion or exclusion.

4.30. In conclusion, the Sequential Test has been prepared in a manner that is fully compliant with local and national policy. It is based on up-to-date evidence, applies a proportionate and structured methodology, and demonstrates that no reasonably available alternative sites exist within the search area that would be at a lower risk of flooding and suitable for the proposed development.

5. The Exception Test

5.1. Having passed the Sequential Test through a site-specific assessment at application stage, as required by NPPF Paragraph 177, the Exception Test (ET) is considered to be the next stage. Paragraph 177 states:

> *"Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3."*

5.2. NPPF Annexe 3 defines residential use as being 'more vulnerable'. The NPPF, and the Government Planning Practice Guidance "Flood risk and coastal change" recommends the use of Table 2 below to determine whether the ET is required.

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 unit. As defined in Annex 3 of the NPPF, residential development is classified as 'More Vulnerable'. While the application site lies within Flood Zone 1 for fluvial and tidal flooding, it is designated as being at high risk of surface water flooding under both current and future climate change scenarios, as confirmed by the Flood Risk Assessment (Unda, 2025) and EA RoFSW mapping.

5.4. The Planning Practice Guidance (PPG) and the Flood Risk and Coastal Change guidance confirm that surface water flood risk must be given equivalent weight to fluvial and tidal flood risk in determining whether the Exception Test applies. As a result, the Exception Test must be applied in this case, despite the fluvial designation being Zone 1, due to the confirmed high surface water hazard affecting the site.

5.5. Figure 3 (PPG Table 2) provides a matrix for applying flood zone and vulnerability classification. For 'More Vulnerable' development in Flood Zone 3a, the Exception Test is required.

5.6. Although the proposal is not located in fluvial Flood Zone 3, the site's surface water flood profile (which includes predicted depths of 0.2–0.3m under future climate scenarios) triggers the same policy obligation for Exception Test consideration.

5.7. The following section sets out how the development satisfies the two criteria of the Exception Test:

- That the development provides wider sustainability benefits to the community that outweigh the flood risk; and
- That it will be safe for its lifetime without increasing flood risk elsewhere, and where possible, will reduce overall flood risk.

Application of the Exception Test:

5.8. Following the application of the Sequential Test and confirmation that no reasonably available alternative sites exist at lower flood risk, it is appropriate to apply the Exception Test in accordance with Paragraph 177 of the National Planning Policy Framework (NPPF, 2024). While the site is located in Flood Zone 1 for fluvial and tidal flooding, it is designated as high surface water flood risk, which under both national and local guidance, triggers the Exception Test.

5.9. The proposed development is classified as 'More Vulnerable' in the NPPF's Flood Risk Vulnerability Classification. National Planning Practice Guidance confirms that surface water flooding must be considered with the same weight as other forms of flooding. Therefore, both limbs of the Exception Test must be satisfied.

5.10. To pass the Exception Test, the following must be demonstrated:

(A) That the development provides wider sustainability benefits that outweigh the flood risk; and

(B) That the development will be safe for its lifetime, without increasing flood risk elsewhere, and where possible, will reduce overall risk.

(A) Wider Sustainability Benefits:

5.11. The proposed development delivers meaningful contributions to the principles of sustainable development as defined by Paragraph 8 of the NPPF, which encompass economic, social, and environmental objectives. It also aligns with the goals and spatial priorities set out in the Worthing Local Plan (2023), particularly those promoting compact growth, housing delivery on brownfield land, and the creation of resilient, inclusive neighbourhoods.

5.12. The site comprises a small, underutilised parcel of previously developed land located within an established residential area, with direct access to existing infrastructure, transport links, services, and employment opportunities. Its location adjacent to local bus routes and within walking distance of Worthing town centre and train station provides excellent access to sustainable transport, reducing reliance on private car use.

5.13. The proposal brings forward a small, high-quality home in an area with demonstrable housing demand, contributing to local targets for windfall and infill development. While modest in scale, the scheme makes optimal use of land, delivering housing in a manner that:

- Avoids urban sprawl or greenfield encroachment;
- Supports compact, mixed-use growth; and
- Aligns with the built character and strategic aims for the neighbourhood.

Economic Benefits

5.14. The proposed development contributes to the local economy both short-term and long-term:

- Construction activity will create jobs for local contractors, suppliers, and service providers.

- The future occupier(s) will support local businesses, amenities and services within walking distance, including shops, schools, and transport hubs.
- The site is within the Town Centre Sustainable Transport Zone, meaning it benefits from strategic transport investment and policy support for inward development.

Social Benefits

5.15. By contributing to local housing supply, the development helps meet local housing need in a well-served location. The site lies in a highly accessible area with proximity to:

- Education facilities, including primary and secondary schools;
- Healthcare, including GP surgeries and community health services;
- Cultural and civic infrastructure, such as Worthing Library, parks and recreation areas;
- Local employment centres.

5.16. The compact form of development supports social inclusion by promoting housing delivery within existing communities, not on the edge of town or in isolated locations. It contributes to a diverse housing mix, and its walkable urban location helps reduce transport inequality.

Environmental Benefits

5.17. The scheme has been designed to integrate passive and active sustainability measures, including:

- High thermal performance and low operational energy demand;
- Use of durable, low-impact materials;
- Surface water attenuation and SuDS integration, contributing to the site's climate resilience;
- Zero-carbon operational potential, subject to final specification;
- Enhanced flood resilience through design, reducing the future burden on public infrastructure;
- Redevelopment of a small, constrained brownfield plot — which would otherwise remain vacant — thereby maximising land-use efficiency.

5.18. The development's urban infill character also supports broader environmental goals by minimising travel distances, reducing the need for car-dependent living, and contributing to the 15-minute neighbourhood concept endorsed by many local and regional strategies.

5.19. Together, these benefits demonstrate that the proposal clearly meets and exceeds the first limb of the Exception Test — providing wider sustainability gains that significantly outweigh the localised flood risk..

Site-Specific Flood Risk

5.20. The FRA outlines a building design response, against a measured climate change adjusted risk factor, from all known flood sources, and will detail how the property will remain safe over the course of its lifetime. The FRA is summarised in the following section.

(B) Development will be Safe for its Lifetime:

5.21. The proposed development has been designed in line with the site-specific Flood Risk Assessment (FRA, Unda, 2025) and verified by the proposed architectural plans (Drawing No. 02A, Rev A, dated 17.04.25).

5.22. The following key measures demonstrate that the development will be safe for its lifetime:

- **Finished Floor Levels (FFL):**
  - The internal floor is raised 220 mm above ground level, with the bedroom platform raised a further 220 mm, giving a total elevation of 440 mm, which exceeds modelled flood depths of up to 0.3 m.

- **Flood-Resilient Design Measures:**
  - The ground floor is constructed using a concrete slab and waterproof membrane. Materials include closed-cell insulation, water-resistant fittings, and raised sockets. A non-return valve is incorporated in the drainage system to prevent backflow.

- **Drainage Strategy and SuDS:**
  - Surface water runoff will be managed via permeable paving and attenuation features. The strategy includes on-site water storage and staged discharge, reducing peak flows and mitigating offsite flood impacts.

- **Safe Access and Egress:**
  - The FRA confirms a safe pedestrian route to higher ground along Rugby Road, which remains dry under modelled scenarios for both present-day and climate change conditions.

5.23. These measures exceed standard mitigation and show how surface water risk is reduced, not just managed. The development therefore satisfies the second limb of the Exception Test, ensuring long-term resilience and safety.

Exception Test Summary:

5.24. 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 (2024), are considered to be fully satisfied.

5.25. Part A of the test requires demonstration that the proposed development provides wider sustainability benefits to the community that outweigh flood risk. The development responds to this by delivering a compact, energy-efficient residential unit on a vacant brownfield site within the built-up area of Worthing. It contributes to housing delivery in a location that is well-connected by sustainable transport, close to services and employment, and within a neighbourhood supported by the Local Plan. The scheme delivers measurable economic, social and environmental benefits, including reduced per capita carbon emissions, support for local economic activity, and integration into an established community. These benefits are directly aligned with the objectives of Paragraph 8 of the NPPF and the sustainability aims of the Worthing Local Plan (2023).

5.26. Part B requires that a site-specific Flood Risk Assessment (FRA) demonstrates the development will be safe for its lifetime, taking account of climate change and user vulnerability, and will not increase flood risk elsewhere. This requirement has been met through the submission of a robust FRA (Unda, May 2025), supported by proposed architectural plans (Drawing No. 02A, Rev A) which incorporate:

- Finished Floor Levels raised 440 mm above external ground level, exceeding modelled surface water flood depths;

- Flood-resilient construction measures, including waterproof materials, raised utilities, and non-return valves;

- A sustainable drainage strategy (SuDS) incorporating permeable surfaces and attenuation features;

- Verified safe access and egress via Rugby Road, which remains dry under all modelled conditions and provides a safe route to refuge.

5.27. These measures ensure that flood risk to the site is reduced and managed appropriately, and that no offsite impacts will result from the development.

5.28. In addition to national policy, the proposal aligns with guidance set out in Paragraph 4.125 of the Worthing Local Plan, which states:

> *"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."*

5.29. While the application site is not a strategic allocation, it has been subjected to an equally rigorous Sequential and Exception Test process, using the most up-to-date flood data and planning guidance available. The development demonstrates both sustainability merit and flood safety, and it has therefore passed the Exception Test in full.

6. Conclusion

6.1. Unda Consulting Limited have 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, BN11 4SS.

6.2. This assessment has been undertaken in full compliance with the National Planning Policy Framework (NPPF, 2024), the Planning Practice Guidance (PPG) on flood risk and coastal change, and the Adur & Worthing Councils' Sequential Test Methodology: Guidance for Planning Applications (July 2024). Local policy and evidence base documents, including the Worthing Local Plan (2023) and the Adur & Worthing Strategic Flood Risk Assessment (SFRA, 2024), have also informed this assessment.

6.3. While the site is located within Flood Zone 1 for fluvial and tidal flooding, it is identified by both the EA Risk of Flooding from Surface Water (RoFSW) maps and the SFRA as being subject to high surface water flood risk. As such, both the Sequential and Exception Tests are applicable and have been applied accordingly.

6.4. The Sequential Test has been undertaken using a clearly defined and locally appropriate area of search, corresponding with the built-up area of Worthing. This approach is explicitly supported by the Adur & Worthing methodology for developments of this scale. Sites within this area were identified using three main sources:

- The Adur & Worthing Strategic Housing Land Availability Assessment (SHLAA, 2023);
- The Brownfield Land Register (BLR, 2023); and
- Publicly available listings from Rightmove, Zoopla, and OnTheMarket, supplemented by local estate agent sites.

6.5. Each identified site was assessed for suitability, availability, planning status, flood zone classification, and surface water risk, and the results are summarised transparently in Appendix A (Table A1). The Sequential Test found that:

- Sites within Flood Zones 2 and 3 were excluded due to higher risk;
- Many SHLAA and BLR sites were either already built out, consented, or unavailable for independent residential development;
- Marketed sites were either unsuitable in size, typology, or subject to flood risk constraints.

6.6. In accordance with national and local guidance, the Sequential Test concludes that there are no reasonably available alternative sites at lower flood risk capable of accommodating the proposed development. The proposal at 9 Station Parade, therefore, passes the Sequential Test.

6.7. The Exception Test is required due to the site's classification as 'More Vulnerable' and the presence of high surface water flood risk. Both parts of the test have been met:

Part A (Wider Sustainability Benefits)

6.8. The development brings a small, previously developed site back into beneficial use, contributing to local housing delivery within an established urban area. It aligns with the spatial strategy of the Worthing Local Plan and the aims of sustainable development in the NPPF (Paragraph 8), delivering environmental, economic, and social benefits. These include low-carbon construction, support for active travel, optimised land use, and support for local services and infrastructure. Its location within a walkable neighbourhood minimises transport emissions and supports climate adaptation goals.

Part B (Safety Over Lifetime of Development)

6.9. A detailed Flood Risk Assessment (Unda, May 2025) and the accompanying architectural proposals (Drawing No. 02A, Rev A) demonstrate that the site can be safely developed. The dwelling incorporates raised floor levels (up to 440mm above ground), flood-resilient construction, a sustainable drainage system (SuDS), and verified safe access and egress via Rugby Road, which remains outside the modelled surface water flood extents under all climate change scenarios. The development not only avoids increasing flood risk elsewhere but actively improves on-site drainage conditions and reduces local flood risk impacts.

6.10. This approach has been developed in full accordance with the Sequential and Exception Test Methodology published by Adur & Worthing Councils, including transparent site filtering, up-to-date evidence, and flood zone mapping as required by the NPPF and PPG.

6.11. In conclusion, the proposed development at 9 Station Parade:

- Satisfies the Sequential Test through a robust and policy-compliant assessment process;
- Meets both criteria of the Exception Test through demonstrated sustainability benefits and verified safety measures;
- Aligns with the aims of the Worthing Local Plan and contributes to the borough's sustainable development objectives.

6.12. **Accordingly, 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
May 2025

Appendix

Table A1:

- Potentially Available Residential sites in the SHLAA;
- Brownfield Register;
- Local agent online searches.

Table A1

Ref	Site Name / Address	Source	Site Size (ha)	Proposed Capacity	Planning Status	Flood Zone (EA)	Surface Water Risk	Reason for Exclusion / Notes
BLR-001	14 - 20 Windsor Road, Worthing BN11	BLR	0.16	10 units	No Application	Zone 1	Low	Potential hotel conversion; unclear availability.
SALE-001	19 Reigate Road, Worthing BN11 5NE	SHLAA	0.1	6 units	Approved	Zone 1	Low	Former care home; permission for flats granted
SALE-002	22 Lyndhurst Road, Worthing BN11 2DG	SHLAA	0.2	24 units	Refused	Zone 1	Low to Medium	Principle of residential accepted; appeal dismissed on design grounds
SHLAA-001	24 Richmond Road, Worthing BN11 1PS	SHLAA	0.3	6 units	Pending	Zone 1	Low	Appeal pending; principle supported
SHLAA-002	38 Northcourt Road, Worthing BN14 7DT	SHLAA	0.05	7 units	Approved, Pending	Zone 1	Low	Already consented; progressing to development.
SHLAA-003	42 - 46 Teville Road, Worthing BN11 1UG	SHLAA	0.06	9 units	Approved, Pending	Zone 1	Low	Already approved and deliverable. / Application approved post-monitoring; small site
SHLAA-004	Approximate site off Dominion Road/Queen Street, Worthing BN14	SHLAA	0.1	2 units	No Application	Zone 2	Medium	Excluded due to higher flood risk (Zone 2 or 3)
SHLAA-005	Arundel Road, Worthing BN13	Agent	0.02	1 units	No Application	Zone 1	Low	Small plot; subject to planning approval.
SHLAA-006	Caravan Site, Titnore Way, Worthing BN13 3RT	SHLAA	2.7	100 units	No Application, Not Available	Zone 1	Medium	Council-owned; Not released; subject to lease retention and isolated.
SHLAA-007	Centenary House, Durrington Lane, Worthing BN13 2QB	SHLAA	3.88	250 units	No Application	Zone 1	Low to Medium	One Public Estate redevelopment; feasibility ongoing
SHLAA-008	Former Canteen, Northbrook College	SHLAA	0.35	20 units	Pending	Zone 1	Low	Initial refusal; revised lower density expected
SHLAA-009	Former Canteen, Northbrook College, Carnegie Road, Worthing BN13 1AR	SHLAA	0.35	20 units	Refused	Zone 1	Low	Refused but potentially resubmittable; not currently deliverable.
SHLAA-010	Former Gas Holder Site, Lyndhurst Road, Worthing BN11 2DG	SHLAA	1.13	150 units	No Application	Zone 1	Low to Medium	Contamination and access constraints.
SHLAA-011	Grafton MSCP, Augusta Place, Worthing BN11 3QA	SHLAA	0.76	150 units	No Application, Pending	Zone 3	Medium to High	Excluded due to higher flood risk (Zone 2 or 3)
SHLAA-012	Jubilee Hall & 10 Greenland Road, Worthing BN13 2RQ	SHLAA	0.28	14 units	Pending	Zone 1	Low	Community use to be relocated; accepted in principle
SHLAA-013	Jubilee Hall and 10 Greenland Road	SHLAA	0.28	14 units	Pending	Zone 1	Low	Too large for comparison; scheme progressing.
SHLAA-014	Jupps Garage, Queens Road, Worthing BN11 3LX	SHLAA	0.1	5 units	Approved	Zone 1	Low	Former garage, now approved for terraced dwellings
SHLAA-015	Land North of Beeches Avenue, Worthing BN14 8AW	SHLAA	2.8	90 units	Refused	Zone 1	Low	Greenfield site adjacent SDNP; promoted in emerging plan / SDNP edge; access and sensitivity constraints.
SHLAA-016	Land West of Fulbeck Avenue, Worthing BN13 3RS	SHLAA	0.85	120 units	Approved, No Application	Zone 1	Medium	Proposed allocation; recent application subject to S106 / Site approved; not available.

SHLAA-017	Land adjacent to 31 Mill Road, Worthing, BN11	Zoopla	0.05	1 units	Approved	Zone 1	Low	Permission for modest dwelling; comparable and potentially suitable.
SALE-003	Land adjacent to 36 The Plantation, Worthing BN13 2AJ	Zoopla	0.05	1 units	Approved	Zone 1	Low to Medium	Directly comparable site with permission; availability subject to market.
SALE-004	Land at 14â€“20 Windsor Road, Worthing, BN11	Rightmove	0.16	9 units	Prior Approval	Zone 1	Low	Conversion of hotel to flats; not comparable in development type.
SALE-005	Land at Upper Brighton Road, Worthing BN14 9JH	SHLAA	7.5	123 units	No Application	Zone 1	Low	Greenfield with landscape sensitivity; allocated in emerging plan
SALE-006	Land between 19â€“21 Pavilion Road, Worthing BN14 7EL	OnTheMarket	0.05	1 units	No Application	Zone 1	Medium	No current permission, may be deliverable but uncertain planning status.
SALE-007	Land between 76 and 78a Brighton Road, Lancing BN15 8LW	BLR	0.1	8 units	Pending	Zone 1	Low	Outside Worthing boundary; planning application pending.
SALE-008	Land east of Titnore Lane	SHLAA	6.9	60 units	No Application	Zone 1	Medium to High	Limited development supported with mitigation
SALE-009	Land opposite 5 New Road, Worthing BN13 3PB	Agent	0.02	1 units	No Application	Zone 1	Low	Small plot; subject to planning approval.
SALE-010	NHS Property Services Site, The Causeway, Worthing BN13 1AR	SHLAA	0.32	48 units	Prior Approval	Zone 1	Low	Permitted development conversion of offices
SHLAA-018	Rear of 15 Grand Avenue, Worthing, BN11	Zoopla	0.06	1 units	Approved	Zone 1	Low	Higher-end market; technically suitable, viability may differ.
SHLAA-019	Stagecoach Bus Depot, Library Place, Worthing BN11 1DH	SHLAA	0.69	60 units	No Application	Zone 3	Medium to High	Excluded due to higher flood risk (Zone 2 or 3)
SHLAA-020	Teville Gate, Railway Approach, Worthing BN11 1TY	SHLAA	1.47	250 - 378 units	Approved, Pending	Zone 1	Low	Strategic regeneration site; not comparable in scale or function
SHLAA-021	The Wheatsheaf, Richmond Road	SHLAA	0.3	6 units	Pending	Zone 1	Medium	Uncertain status; outcome pending appeal.
SHLAA-022	Union Place, Worthing BN11 1LG	SHLAA	1.12	150 - 186 units	Pending	Zone 1	Low	Council-owned; proposed for residential and commercial/leisure use. Not available; part of wider mixed-use regeneration.