

Lewes District Council Strategic Flood Risk Assessment

PPS25 Sequential and Exception Tests for the Lewes Core Strategy DPD

Introduction

The emerging Core Strategy for the Lewes District Council Local Development Framework is required to identify locations for residential and commercial development.

This document will set out the Sequential Tests relating to the locations or development areas of more than 50 units identified in the Core Strategy following the guidance in PPS25 and the accompanying Practice Guide. This will be carried out in detail once the Strategic Housing Land Availability Assessment and Employment Land Review are underway to inform the potential strategic development sites.

Part 1 will provide information about the general locations referred to in the core strategy.

Part 2 will set out the Sequential Test for each general location.

Part 3 will set out the Exception Test for particular uses in the general locations where this test is required.

Separate Sequential Tests will be prepared for land uses identified through the site allocations DPD and for any masterplans that are prepared as part of the Local Development Framework.

Part 1 - Context and Background

Major flood areas, flood zone 3, have been identified in the Lewes District Council area and result from a combination of fluvial and tidal flooding. Groundwater can also result in serious flooding but this is limited to relatively small specific areas.

The centre of Lewes, close to the River Ouse, has suffered serious flooding in the past, the most recent being the floods of October 2000. This area is particularly prone to fluvial flooding although increases in sea levels due to climate change will also impact on Lewes in the future.

Land either side of the River Ouse in Newhaven is also at risk of flooding and this is primarily due to tidal flooding.

Lewes District Council is severely constrained by other factors such as the National Park, Areas of Special Scientific Interest and Areas of outstanding Natural Beauty so that the number of development sites is limited.

The following table will set out the development sites that have been considered within the Sequential Test that are greater than 50 residential units. Existing land uses of each site will be included, where known, together with proposed uses, the flood risk vulnerability classification for the proposed uses and existing flood defences that provide protection for the site from flooding.

Sites within Flood Zone 1 are not assumed to be protected by flood defences as the land elevation is above the predicted flood level.

Table 1 – Analysis of proposed development areas identified for housing development						
Development Area	Flood risk Zone(s)	Existing Flood Defences	Existing uses	Proposed uses	Number of proposed units	Flood vulnerability Classification (according to PPS25 table D2)
Lewes						
Example Site Address	FZ3	None	Agricultural	Residential	100	More vulnerable
Newhaven						
Peacehaven / Telscombe						
Seaford						
Parishes						

Part 2 – The Sequential Test

The aim of decision-makers should be to steer new development to Flood Zone 1. Where there are no reasonable available sites in Flood Zone 1, decision-makers should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 and 2 should decision-makers consider the suitability of sites in Flood Zone 3, taking account the flood risk vulnerability of land uses and applying the Exception Test if required.

Within each flood zone, new development should be directed first to sites at the lowest probability of flooding and the flood vulnerability of the intended use matched to the flood risk of the site, ie higher vulnerability uses should be located on parts of the site at lowest probability of flooding.

The Lewes District Council site identification is likely to include development areas in Flood Zones 1,2 and 3 so the following tests will consider those locations in sequence.

It should be noted that Government guidance in PPS25 and the accompanying Practice Guide does not intend to prevent all development on sites liable to flooding, accepting that some form of development may have to be located there. Nevertheless, due to the risks of developing on land liable to flooding, the intention is to minimise risks to people and property.

Table 2 – the Sequential Test

1. Are the proposed development areas in Flood Zone 1 – Low probability of flood risk?	
Yes	<p>Development areas wholly within Flood Zone 1 include:</p> <p>Lewes: Example Site Addresses</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p>
No	<p>For areas wholly or partly within Flood Zone 2 and 3, proceed to Q2</p> <p>Relevant areas are:</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p>

2. Could the following proposed development areas in Flood Zones 2 and 3 be alternatively located in Flood Zone 1?

Lewes:

Newhaven:

Peacehaven / Telscombe:

Seaford:

Parishes:

<p>No</p>	<p>a) identify sites that were considered and explain why they were dismissed</p> <p>All development sites with the District above 50 units will be considered in the Sequential Test. These may include a number of sites within Flood Zone 1. Table 3 in the Appendices will give details of why a number of the sites within Flood Zones 1 have not been taken forward for residential development. The locations are:</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p> <p>The sites in Flood Zone 3 have also been reviewed and the details why these sites have not been taken forward for residential development are also in Appendix 3. These sites are:</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p>
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	<p>b) explain why the proposals cannot be directed to Flood Zone 1</p> <ul style="list-style-type: none"> • if the site is in Flood Zone 2, proceed to question 3 <p>None</p> <ul style="list-style-type: none"> • if the site is in Flood Zone 3a proceed to question 4 <p>Sites in this category are:</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p> <ul style="list-style-type: none"> • if the site is in Flood Zone 3b proceed to question 5 <p>Sites located in more than one Flood Zone will require answers to questions 3, 4 and 5 as necessary</p>
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3. Development Areas in Flood Zone 2	
<ul style="list-style-type: none"> • There are X development areas in Flood Zone 2, in whole or part. 	
3a – are the proposed uses in the “water compatible”, “less vulnerable”, “more vulnerable” or “essential infrastructure” Flood Risk Vulnerability Classifications as presented in table D2 of PPS25	
yes	List the proposed uses in these classifications:
No	List the proposed uses that are not within those classifications: For these proposed uses proceed to question 3b
3b – Can the “highly vulnerable” development types be directed to parts of the site where the risks are lower both for occupiers and the premises themselves?	
Yes	Identify how the risks have been reduced: Proceed to Exception Test
No	Explain why the development types cannot be relocated: Proceed to Exception Test

4. Development Areas in Flood Zone 3a
 Locations in flood zone 3a in part or in whole include:

Lewes:

Newhaven:

Peacehaven / Telscombe:

Seaford:

Parishes:

4a – Can the development be redirected to Flood Zone 2?

No	<p>Explain why the development types can not be relocated to Flood Zone 2:</p> <p>The SFRA clearly demonstrates that Flood Zone 2 is extremely small and is approximately the same extent as Flood Zone 3.</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p> <p>Proceed to Question 4b</p>
Yes	Not applicable

4b – Are the proposed uses in the “water compatible” or “less vulnerable” Flood Risk Vulnerability Classifications as presented in Table D2 of PPS25?

Yes	<p>List the proposed uses in these classifications:</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p>
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No	<p>List the proposed uses not in these classifications:</p> <p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p>
<p>4c Is the development in the “highly vulnerable” classification”?</p>	
No	<p>Lewes:</p> <p>Newhaven:</p> <p>Peacehaven / Telscombe:</p> <p>Seaford:</p> <p>Parishes:</p> <p>Proceed to question 4d</p>
<p>4d Can the more sensitive development use types be directed to parts of the site where the risks are lower for both occupiers and the premises themselves?</p>	
	<p>It is expected that planning policies will direct the more vulnerable uses away from the source of flooding and closer to the outer edges of Flood Zone 3. In general the most sensitive uses on each site should be located in areas of lower risk, if such locations can be identified. Site specific locations for the “more vulnerable” uses will be determined at the planning application stage.</p> <p>It must be demonstrated that an adequate standard of safety against flooding can be achieved through a site specific flood risk assessment and will comply with the Environment Agency’s requirements and the Exception Test if applicable.</p> <p>Proceed to the Exception Test</p>

5. For sites in Flood Zone 3b, the functional floodplain	
Locations in flood zone 3b in part or in whole include:	
5a Can the development proposal be redirected to Flood Zone 2?	
	Explain why
No	Not applicable
5b Can the development proposal be redirected to Flood Zone 3a?	
5c Is the development proposal in the “water compatible” classification?	
Yes	These forms of developments are appropriate in that location
No	Proceed to Question 5d
5d Is the development proposal in the “essential infrastructure” classification?	
Yes	
No	

Part 3 – The Exception Test

The Exception Test is applied to ensure the risks have been properly assessed and that appropriate mitigation measures are provided. All “more vulnerable” and “essential infrastructure” development proposals in Flood Zone 3a must pass the Exception Test and must already have passed the Sequential Test. “Essential infrastructure” development proposals in Flood Zone 3b must pass the Exception Test and must already have passed the Sequential Test.

Questions 1 to 4 are set out in PPS25

1. Do the development proposals make a positive contribution to sustainable communities and to the sustainable development objectives of the Lewes District Council Local Development Framework?	
	Lewes: Newhaven: Peacehaven / Telscombe: Seaford: Parishes:

2 Are the development proposals on developable brownfield land or where there are no reasonable alternative options on brownfield land?	
	Lewes: Newhaven: Peacehaven / Telscombe: Seaford: Parishes:

3. Has a flood risk assessment been produced that demonstrates the development is safe, the residual risks of flooding to people and property (including the likely effects of climate change) are acceptable and can be satisfactorily managed?	
	Lewes: The Strategic Flood Risk Assessment for Lewes District Council

included a Level 2 SFRA for Lewes –Phoenix site. The SFRA identified the flood risks, including depth, rate of onset, velocity and the residual risk to people and property for the existing situation and for the situation if the whole area was protected to a standard which would prevent flooding including the impact of climate change.

The analysis shows there is a small increase in flood risk upstream of the site when the whole area is protected and the Site Specific Flood Risk Assessment must show how these increased flood risks will be mitigated so that there is no adverse impact on adjacent properties and preferably some improvement.

Newhaven:

The Strategic Flood Risk Assessment for Lewes District Council included a Level 2 SFRA for Newhaven – Eastside. The SFRA identified the flood risks, including depth, rate of onset, velocity and the residual risk to people and property for the existing situation and for the situation if the whole area was protected to a standard which would protect the area against all flood risk, after taking account climate change.

The analysis shows there is a small but more significant increase in flood risk upstream of the development site when the whole area is protected and the Site Specific Flood Risk Assessment must show how these increased flood risks will be mitigated so that there is no adverse impact on adjacent properties and preferably some improvement.

The Environment Agency are proposing to investigate changes to the flood defences between Newhaven and Lewes which may result in more frequent flooding of the marshes. There is potential scope for combining these studies to maximise the benefits in any change to the existing or improved defences.

The detailed modelling carried out for the Newhaven Eastside also covered the area at Robinson Road. The detailed analysis showed that under present conditions only a very small part of the site is affected by flooding and the majority of the site is within flood zone 1.

Under the climate changes scenario, a greater proportion of the site is affected by shallow flooding. There is no discernible difference in the area flooded for the existing defences in 2115 or with raised defences around the Newhaven Eastside site.

Nevertheless there are other residential properties adjacent to the site and the Site Specific Flood Risk Assessment must show how the flood risk for the 2115 situation will be mitigated and that this will not cause a worsening of flood risk to those adjacent properties.

Peacehaven / Telscombe:

	Seaford: Parishes:
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1. Does the development make a positive contribution to reducing or managing flood risk	
	Lewes: Newhaven: Peacehaven / Telscombe: Seaford: Parishes:

Appendices

Development locations over 50 units that were considered

Table 3 –Locations that were considered in the strategy but rejected

Sites considered	Flood Zone	Reasons why not included in LDF
Lewes		
Newhaven		
Peacehaven / Telscombe		
Seaford		
Parishes		

Table 4 – Alternative ways of accommodating the development in order to locate it within Flood Zone 1

Alternative ways to accommodate the development considered	Reasons why not included in Core Strategy