



Horsham District Council

Sequential and Exception Flood Risk Tests

Horsham Local Plan 2023-2040

September 2024

1.0 Introduction

- 1.1 This Sequential Test and Exception Test relate to the allocations put forward in the Horsham District Local Plan 2023-2040 (the HDLP).
- 1.2 This is a procedure document to help evidence how the HDLP has been prepared in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance in respect of flood risk. The purpose of the document is to demonstrate that sites allocated for development in the plan are suitable for development based on the Sequential and, where necessary, Exception Test. This takes into account all sources of flood risk, in a manner which is accepting of the limitations associated with the data currently available.
- 1.3 In December 2023, a revised NPPF was published. Paragraph 230 (Annex 1) sets out transitional arrangements for plan-making. The HDLP reached regulation 19 stage (pre-submission) before 19 March 2024 and so will be examined under the September 2023 version of the NPPF. For this reason, any references to the NPPF in this topic paper should be assumed to be to the September 2023 NPPF¹.
- 1.4 The Sequential Test draws upon information gathered and detailed within the District Council's Strategic Flood Risk Assessment (SFRA) (2020) and SFRA Update (2024). The tests were carried out in line with the steps outlined in the NPPF and accompanying technical guidance. It follows examples of best practice as highlighted by the Environment Agency.

2.0 The Strategic Flood Risk Assessment

- 2.1 The NPPF requires that strategic policies should be informed by a SFRA and should manage flood risk from all sources (paragraph 166). More details regarding the requirements pertaining to the SFRA are set out in the Planning Practice Guidance (PPG)² and in guidance issued by the Environment Agency³. A Level 1 SFRA was produced in 2020 to support the preparation of the HDLP. In 2024, consultants were commissioned to produce an updated version of the SFRA to reflect changes in planning policy as well as improvements in flood mapping and modelling datasets. This update was intended to support the submission version of the HDLP and assess all sources of flooding in the plan area, both now and in the future as a result of climate change. In addition, it provides guidance for how the Sequential Test should be applied, established in partnership with the Council.
- 2.2 A Level 2 SFRA considers the flood risk aspects of potential allocated sites in more detail. Fundamentally, the Level 2 assessment establishes whether the development in question can be made safe (while also not increasing flood risk elsewhere). In assessing sites as part of the SFRA Update 2024, it is considered that it is appropriate for detailed modelling on the allocated sites to take place at the planning application

¹

<https://webarchive.nationalarchives.gov.uk/ukgwa/20230929144819/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.gov.uk/guidance/flood-risk-and-coastal-change#taking-flood-risk-into-account-in-preparing-plans>

³ <https://www.gov.uk/guidance/local-planning-authorities-strategic-flood-risk-assessment>

stage. This is because the sites which might require further assessment have relatively small areas within Flood Zones and these have been taken forward in the knowledge that all development would take place in Flood Zone 1 only while delivering the necessary number of homes. The site allocation policy also makes this requirement clear.

3.0 Horsham District Local Plan site allocations

- 3.1 The HDLP makes provision for at least 13,212 homes and associated infrastructure within the period 2023-2040. This is made up of 3 strategic site allocations, 31 non-strategic site allocations, existing commitments (sites that have planning permission) and an allowance for windfall housing growth. The HDLP also allocates 4 further sites for employment uses, 3 of which are extensions to existing sites (38 Allocations in total).
- 3.2 As part of its evidence base, the Council is obliged to apply the Sequential Test to the whole planning authority area to increase the possibilities of accommodating development away from areas at risk of flooding now and in the future. As part of the preparation of the Local Plan, the Council undertook an assessment of all sites promoted to the Council that had some degree of potential for allocation. The outcomes from this exercise are set out in the Site Assessment Report (SAR – reference HO11 in the Local Plan Examination Library⁴) which clearly identifies to what degree sites meet criteria that reflect NPPF principles. One of these criteria is 'Flooding / Drainage', such that for all reasonable alternatives, a high-level assessment was made of flood risk, including consideration of whether any part of the site is affected by Flood Zone 2 or 3. It should be noted that in Part F⁵ Appendix 2 of the SAR, there is a list of excluded housing sites located within a protected area or subject to constraint – this includes sites having a significant area affected by Flood Zone 3 thereby compromising those sites' deliverability.
- 3.3 Flood risk constraints must be considered alongside many other planning issues when identifying suitable areas for development in line with other criteria identified in the NPPF. Therefore, whilst there may be a small number of sites with no flood risk, they may be constrained by other factors (such as being in unsustainable locations or having significant impacts on heritage/transport/landscape/etc) which make them unsuitable for allocation.
- 3.4 Consequently, the site selection process, and hence the site allocation options considered as part of the Local Plan review, involved the incorporation of flood risk considerations from the outset of the process. Nevertheless, there is still a need for this stand-alone Sequential Test report to evidence how development has focused on the locations at the lowest risk of flooding, and to include consideration of non-fluvial sources of flood risk.

⁴ See Site Assessment Report Parts A to F in the Examination Library:

<https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Examination-Library>

⁵ https://www.horsham.gov.uk/_data/assets/pdf_file/0006/131739/HDC-Reg-19-Site-Assessment-Report-Part-VI-Appendices-1-and-2-Excluded-Sites-Dec-2023.pdf

4.0 The Sequential Test

- 4.1 The NPPF sets out the essential requirements of the Sequential Test in paragraph 162: *“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. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding”.*
- 4.2 The objective of the test is not to prevent development of land that has higher risk of flooding but rather to ensure that development safely responds to the identified risk and can be sustainably delivered. The Sequential Test has been applied to all reasonable alternatives as set out in this paper.

Applying the Sequential Test

- 4.3 The process of application the Sequential Test in the preparation of a Local Plan is illustrated in Figure 1.

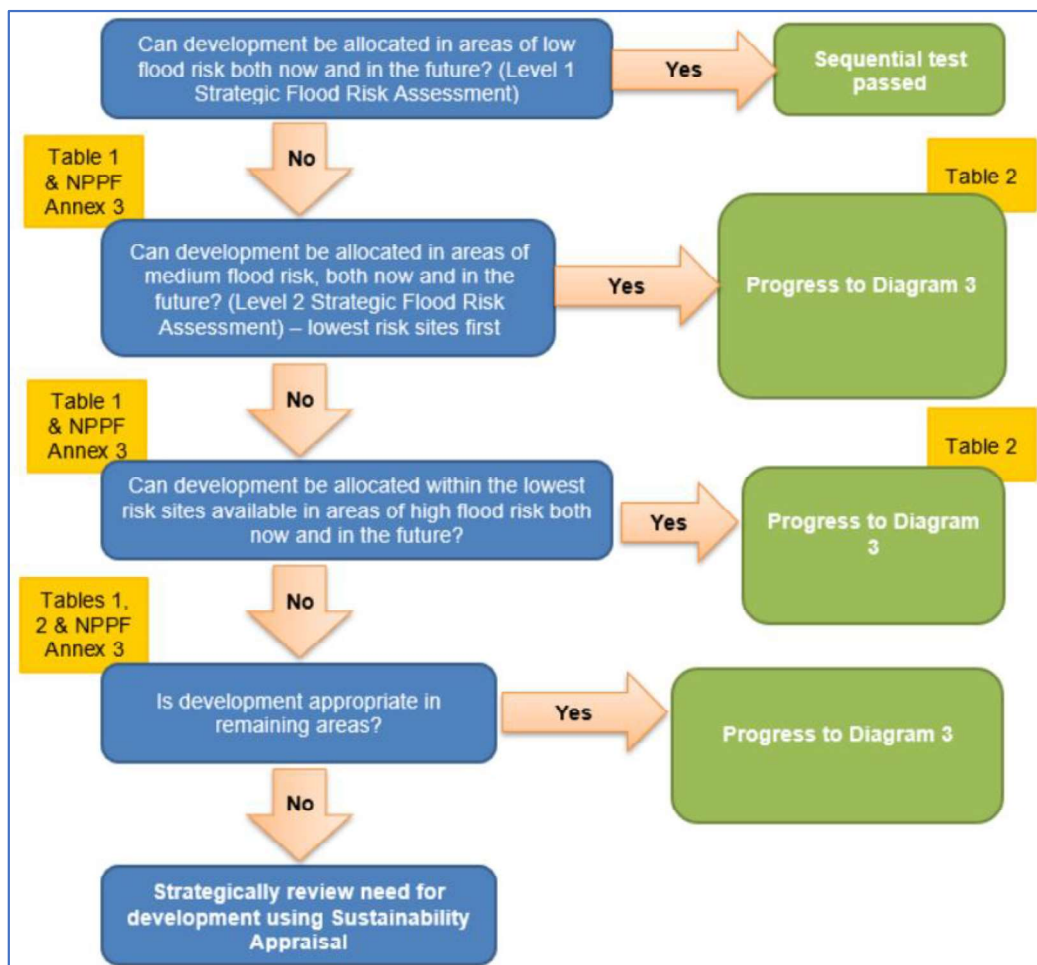


Figure 1 – Application of the Sequential Test for Local Plan Preparation (taken from Diagram 2 of the Planning Practice Guidance: Flood Risk and coastal change)

- 4.4 The 'sequential approach' requires that development can only be located on land identified as high flood risk if there are no reasonably available sites for development in low flood risk, and then medium flood risk. In line with the NPPF, the sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.
- 4.5 In essence, the test seeks to establish sites which are preferable in flood risk terms, i.e. the sites with the lowest risk of flooding. It does this by looking at the mapped extent of flood risk from all sources (incorporating climate change) as detailed in the SFRA Update (2024) Appendix A.
- 4.6 Appendix C of the SFRA Update (2024) provides an assessment of potential development sites against the latest flood risk information available, to enable Horsham District Council to apply a sequential, risk-based approach to the location of development. This is based on the following set of criteria:

Table 1: Summary of ranking criteria applied to sites to assess overall flood risk

Flood Risk Score	Criteria
1	Over 1% of the site is within Flood Zone 3
2	Over 1% of the site is within Flood Zone 2 and/or the modelled fluvial and tidal flood extent
3	The site is defined as Flood Zone 1 and over 10% intersects an area at high risk of flooding from surface water and/or intersects an area in groundwater Class 1
4	The site is defined as Flood Zone 1 and over 10% intersects an area at medium risk of flooding from surface water and/or intersects an area in groundwater Class 2
5	The site is defined as Flood Zone 1 and over 10% intersects an area at low risk of flooding from surface water and/or intersects an area in groundwater Class 3
6	The site is defined as Flood Zone 1 and is at risk of reservoir flooding in the event of a failure or a breach on a wet or dry day.
7	The site is defined as Flood Zone 1 and is not shown to be susceptible to surface water or groundwater flooding.

- 4.7 The above table summarises how the risk of flooding has been assessed, based on the location or features of the site in question. This considers the following:
- The proportion of the site which sits within either Flood Zone 1, 2 or 3,
 - The proportion of the site which is at risk of 1000 year, 100 year and 30 year risk of flooding from surface water,
 - The proportion of the site at risk of flooding based on GeoSmart groundwater datasets. These are ranked from Class 1 (high risk) through to Class 4 (Negligible risk),
 - The proportion of the site at risk of flooding due to reservoir failure.

- 4.8 Flooding from surface water, groundwater, sewers, reservoirs and other artificial sources is not classified into flood zones. However, as part of the SFRA, information has been collected on flood risk from all sources and this has been referred to in order to ensure that development is directed to areas with a lower probability of flooding. For consistency, modelling may show an area at risk of surface water flooding with an annual probability of between 1% - 3.3% (Medium to High Risk) and this has been treated, in the absence of evidence to the contrary, as an area of High Risk of surface water flooding.
- 4.9 Surface water mapping does not strictly describe the same conceptual risk zone as is defined for river and sea flooding (even though it is notionally associated with the same probability) as the mapping is based on different assumptions. However, it does create a product that can accommodate sequential testing, as it can facilitate strategic decisions that direct development to land in a “low risk of surface water flooding zone”. It is not anticipated that the Sequential Test for surface water would necessarily require the consideration of alternative sites at lower risk, as the widespread and dendritic nature of surface water flood risk is conceptually very different to river and sea flood risk. The assessment has taken into account both the location of the risk within the site and association of the area at risk with the flow path.

Findings and conclusions

- 4.10 The SAR identified 38 sites suitable for allocation and 123 alternative sites (‘rejected sites’) which may be available for development but were not recommended for allocation. The SFRA update 2024 ranks each of these sites from 1 to 7, reflective of the flood risk level (with ‘1’ being, in technical terms, the most at-risk of flooding from one or more source, and ‘7’ being least at-risk of flooding). This provides technical metrics to indicate sites with the lowest and highest flood risk and is predicated on the degree of site coverage (as shown in technical modelling) related to any flood risk.
- 4.11 The Sequential Test has been applied to the 38 proposed site allocations within the Regulation 19 Horsham District Local Plan. The findings are set out in Appendix 1 and the conclusions summarised below:
- 30 sites are wholly located in low flood risk areas throughout the lifetime of the development and are therefore deemed suitable for development including residential use.
 - 3 sites are exclusively affected by surface water flooding and will need to be considered further as part of the Exception Test process.
 - 5 sites are affected by one of more of flood zones 2, 3a or 3b as well as surface water flooding, and will need to be considered further as part of the Exception Test process.
- 4.12 Appendix 2 of this paper sets out the findings in relation to the sequential preferability of the reasonable alternatives in relation to flood risk.
- 4.13 Of the 38 Local Plan allocation sites, 35 are sequentially preferable on the basis of the current or future risk of flooding. Where those sites do have some risk of flooding, it will be a requirement for the site to be developed in a manner which accords with national policy requirements and proposed policies in the Local Plan (particularly Strategic

Policy 10) relating to flooding. This has also been covered in site specific allocation policies, where appropriate.

- 4.14 Five of the proposed site allocations, which were identified in the sequential test as requiring further assessment, have broader parts of their area at risk of flooding (greater than 1% within Flood Zones 1 or 2 and future fluvial or tidal flooding) and on this basis reasonable alternatives of these have been assessed (see Appendix 2):
- HA2 – Land West of Ifield, Rusper
 - BRH1 – Land at Lower Broadbridge Farm, Broadbridge Heath
 - HOR1 – Land at Hornbrook Farm, Brighton Road, Horsham
 - STE1 – Land at Glebe Farm, Steyning
 - EM1 – Land South of Star Road, Partridge Green
- 4.15 However, the Council considers that, given the sustainability of their location, the sites should still be considered acceptable in Sequential Test terms if there are no other sustainable sites which are reasonably available.
- 4.16 This interpretation is considered to accord with the NPPF paragraph 163 which states: *“if it is not possible for development to be located in areas with lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied.”*
- 4.17 The Council has undertaken extensive work via the Sustainability Appraisal and throughout the Plan’s preparation to identify what it considers to be the most appropriate development strategy in sustainability terms. This builds on the HDLP Strategic Policy 2: Development Hierarchy and is reflected in the site allocations. The SAR provides an assessment of the sites’ sustainability against economic, social and environmental criteria as expected by NPPF. All sites were also appraised in the Council’s Sustainability Appraisal against a number of sustainability objectives, which included flooding. The LUC Sustainability Appraisal (July 2021), and the Sustainability Appraisal Update (December 2023) contain the detail of these appraisals (SD03a-d in the Local Plan examination library).
- 4.18 As part of the Sequential Test process, a number of reasonable alternatives to HA2, BRH1, HOR1, STE1 and EM1 have been subject to further assessment to consider whether sites in comparable locations or, in the case of the strategic site HA2, whether sites of a similar scale, would be preferable. This is set out in more detail in Appendix 2 and an overview of the site selection rationale is given in paragraphs 4.19 to 4.23 below.
- 4.19 **HA2: Land West of Ifield** is located adjacent to Crawley Borough, in the north east of Horsham District. Although residents are likely to rely on Crawley town for most of their needs, there are good transport links to Horsham town, which is also relatively close and is the main settlement in the District. Given the scale of the site, **other strategic sites** have been considered as reasonable alternative alongside development in **Horsham** town.
- 4.20 **BRH1: Land South of Lower Broadbridge Farm** is in Broadbridge Heath, a Small Town / Larger Village according to the development hierarchy, with a good range of

services and facilities, community networks and employment. Similar categories of settlements, in a similar area of the District are **Southwater** and **Billingshurst**.

- 4.21 **HOR1: Land at Hornbrook Farm** is adjacent to **Horsham**, the main settlement in the District and, consequently, there are no more sustainable settlements to consider according to the settlement hierarchy and reasonable alternatives in Horsham town have been considered.
- 4.22 **STE1: Land at Glebe Farm** is adjacent to Steyning a Small Town / Larger Village according to the development hierarchy, with a good range of services and facilities, community networks and employment. Similar categories of settlements, in the Southern part of the District are **Storrington and Sullington, Upper Beeding, Bramber** and **Henfield**.
- 4.23 **EM1: Land South of Star Road** is located in Partridge Green, a Medium Village in the development hierarchy with a moderate level of services which meet day to day needs but require larger settlements to meet a number of their requirements. Similar or higher (in development hierarchy terms) settlements for review of reasonable alternatives are **Cowfold** and **Henfield**.
- 4.24 It is essential to consider the implications that allocation of reasonable alternatives assessed as part of the Sequential Test would have on housing distribution and the spatial strategy, given the constraints of the District, the infrastructure requirements necessary to deliver the scale of development to be delivered during the Plan period and other considerations such as housing market needs and wider deliverability. The Council has, therefore, exercised professional judgement, on the basis of the objectives of the Plan, to ensure the most sustainable combination of sites is allocated. On this basis, none of the reasonable alternatives have been assessed as being more suitable than the 5 outlined in para 4.14 above.
- 4.25 The table below identifies allocation sites which have passed the sequential test. These pass the test because the flood risk vulnerability of the proposed use is appropriate for the Flood Zone. The sites ranked 5, 6 and 7 have less than 1% of their total area within Flood Zone 2 or 3 (in the great majority of cases it is zero) and contain no land with more than a low risk of surface water flooding. In the few cases where there are areas of Flood Zone 2 or 3 on the site, the sequential approach will be required as part of the site design process to avoid any inappropriate development in those areas.

Table 2 – Allocation sites which pass the sequential test

Site ref	Site name	Number of homes allocated	Ranking (see SFRA Update Appendix 2)	Sequential Test outcome
HA3	Land North West of Southwater	1,000	5	Pass
HA4	Land East of Billingshurst	650	7	Pass
ASN1	Land East of Moudsell Close,	75	7	Pass

Site ref	Site name	Number of homes allocated	Ranking (see SFRA Update Appendix 2)	Sequential Test outcome
BRG2	Land South of Muntham Drive,	25	5	Pass
BRG3	Land at the Old School Site	20	5	Pass
CW1	Field West of Cowfold, North of A272,	35	7	Pass
CW2	Fields West of Cowfold, South of A272, Cowfold / Fields West of Cowfold, South of A272, West of Little Potters	35	5	Pass
HNF1	Land at Sandgate Nurseries	55	7	Pass
HOR2	Land at Mercer Road	300	5	Pass
LWB1	Land at Glayde Farm West of Church Lane	30	7	Pass
LWB2	Land at Trinity Cottage (Land South of Church Farm House)	7	7	Pass
LWB3	Land At Cyder Farm	6	5	Pass
PG2	Land North of The Rise,	55	5	Pass
PG3	Land at Dunstans Farm	120	7	Pass
PLB1	Land at Highfields	25	7	Pass
RD1	Land North of Guildford Road	60	7	Pass
RD2	The Former Pig Farm	6	7	Pass
RS1	Land at Rusper Glebe	12	7	Pass
RS2	Land North of East Street	20	7	Pass
SMD1	Land West of Shoreham Road	40	7	Pass
STO1	Land to the North of Melton Drive, Storrington and Land South of Northlands Lane	70	7 / 5	Pass

Site ref	Site name	Number of homes allocated	Ranking (see SFRA Update Appendix 2)	Sequential Test outcome
STO2	Land at Rock Road	55	7	Pass
TH1	Land North of High Bar Lane	25	7	Pass
WRN1	Land South of Bell Road	20	7	Pass
WCH1	Land at Hatches Estate	15	5	Pass
WCH2	Land West of Smock Alley	15	7	Pass
WCH3	Land East of Hatches House	8	7	Pass
EM2	Land to the West of Graylands Estate, Langhurstwood Road, Horsham	Employment	7	Pass
EM3	Land at Broomers Hill Business Park, Pulborough	Employment	7	Pass
EM4	Land South West of Hop Oast Roundabout, Southwater	Employment	7	Pass

4.26 There are 8 sites being allocated which, following the application of the Sequential Test, require an Exception Test. They are shown in Table 3.

Table 3 – Allocation sites which require an Exception Test

Site ref	Site name	Number of homes allocated	Ranking (see SFRA Update Appendix C)	Sequential Test outcome
HA2	Land West of Ifield	3,000	1	Apply Exception Test
BGR1	Land South of Smugglers Lane	50	4	Apply Exception Test
BRH1	Land South of Lower Broadbridge Farm	133	1	Apply Exception Test

Site ref	Site name	Number of homes allocated	Ranking (see SFRA Update Appendix C)	Sequential Test outcome
HOR1	Land at Hornbrook Farm	100	1	Apply Exception Test
PGR1	Land North of the Rosary	80	3	Apply Exception Test
STE1	Land at Glebe Farm	240	2	Apply Exception Test
TH2	Land West of Stream House	40	4	Apply Exception Test
EM1	Land South of Star Road Industrial Estate	Employment	2	Apply Exception Test

5.0 The Exception Test

Purpose

- 5.1 As previously mentioned, the NPPF states that if it is not possible for development to be located in areas with lower risk of flooding (**taking into account wider sustainable development objectives**), the Exception Test may have to be applied. For reasons outlined earlier relating to development strategy development and Sustainability Appraisal, taking into account wider sustainability objectives, the Council has evidenced that it is not possible to accommodate all development needed to meet NPPF and Local Plan objectives on 'preferred' sites under the Sequential Test. Therefore the Exceptions Test is engaged for a small number of sites.
- 5.2 The NPPF sets out the essential requirements of the Exception Test:

“163. 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.

164. The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

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

165. Both elements of the exception test should be satisfied for development to be allocated or permitted”

Application

5.3 The process of application the Exception Test in the preparation of a Local Plan is illustrated in Figure 2.

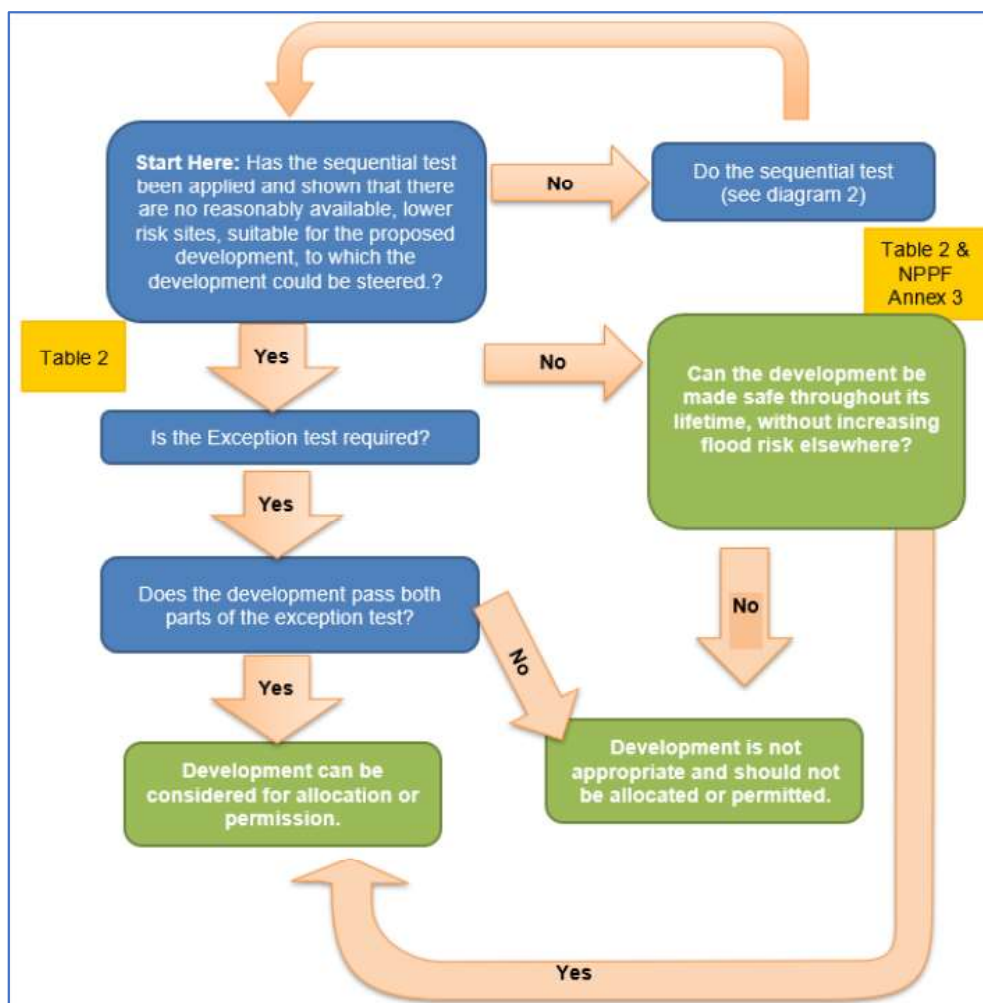


Figure 2: Application of the Exception Test for Local Plan Preparation (taken from Diagram 3 of the Planning Practice Guidance: Flood Risk and coastal change)

5.4 The Exception Test must follow on from completion of the Sequential Test and both elements of the test need to be passed for the site, or sites, in question to be allocated within the Local Plan.

5.5 Furthermore, as referred to in the NPPF, the application of the Exception Test depends upon the level of vulnerability of the proposed land-use. The definition as to what land uses fall within the different designations is set out in Table 2 of the Planning Practice Guidance: Flood Risk and coastal change and is repeated in table 4.

Table 4: Flood Risk vulnerability and flood zone compatibility taken from Table 2 of the Planning Practice Guidance: Flood Risk and coastal change

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 functional floodplain	Exception test required	X	X	X	✓

Key: ✓ Development is appropriate
 X Development should not be permitted

Findings and conclusions

- 5.6 The Council has directed development to the most sustainable locations, thereby in most cases having low level of flood risk. Nevertheless, of the proposed allocations, 8 sites require further assessment.
- 5.7 For each of these 8 sites, the Council has undertaken an Exception Test. This is set out in Appendix 3. The SFRA Update (2024) (CC04) sets out a range of mitigation measures which will need to be adhered to in future site-specific flood risk assessment along with master-planning, where relevant, and development of the site, and will need to be reflected in HDLP policies.
- 5.8 All 8 proposed allocations have satisfied both requirements of the Exceptions Test, subject to adhering to the mitigation measures outlined which reflect both the site assessments and the overarching or, where appropriate, the site specific Local Plan policies.

Appendix A: Sequential Test of Allocated Sites

Site Address	Site Name	Area (Ha)	Capacity	Reference	Vulnerability	Dev. Type	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Recorded Flood Outline within 500m	Distance to Main River (m)	Name of Main River	Distance to Ordinary Watercourse (m)	Proportion of Site within 1000 year RoFSW (%)	Proportion of Site within 100 year RoFSW (%)	Proportion of Site within 30 year RoFSW (%)	Proportion Overlap with Geosmart GW Class 1 - High (%)	Proportion Overlap with Geosmart GW Class 2 - Moderate (%)	Proportion Overlap with Geosmart GW Class 3 - Low (%)	Proportion Overlap with Geosmart GW Class 4 - Negligable (%)	Proportion of Site at risk from Reservoir Failure - Dry day (%)	Proportion of Site at risk from Reservoir Failure - Wet day (%)	Flood Warning Area	Flood Alert Area
South of Lower Broadbridge Farm (Slinfold Parish)	SA386	6.8	133	BRH1	More Vulnerable	Residential	1	94	2.8	2.9	5.9	WARNHAM 1981	43.9	River Arun	36	7.8	2.7	1.3	0.0	0.0	0.0	100.0	0.0	7.4	Solent and South Downs	Solent and South Downs
Land at Hornbrook Farm, Horsham	SA074	10.4	100	HOR1	More Vulnerable	Residential	1	93	1.8	5.4	7.2	HORSHAM RURAL 1960 HORSHAM 1968	425.5	River Arun	0	5.2	2.3	1.1	0.0	0.0	0.0	100.0	0.0	0.0		
Land West of Ifield, Rusper	SA101	171.2	1600	STRATEGIC	More Vulnerable	Residential	1	86	3.9	10.3	14.4	Ifield_Dec2013 06MarchSpring1947 06SeptemberAutumn 1968	785.1	Spruce Hill Brook	0	31.5	18.8	14.8	0.0	0.0	7.4	92.5	7.2	20.4	6.74551	14.4154
Land at Glebe Farm, Steyning	SA742	13.4	240	STE1	More Vulnerable	Residential	2	100	0.0	0.0	9.2	STEYNING 1974 STEYNING 1980 STEYNING 1981 Winter 13/14 East Hampshire Aerial Photography	101.1	Black Sewer	102	6.1	1.7	0.9	5.1	6.9	0.1	87.9	0.0	1.1		
Land South of Star Road, Partridge Green	SA063	37782.3		EM4	Less Vulnerable	Employment	2	100	0.1	0.0	6.5		995.1	Western Adur	603	2.2	0.2	0.1	0.0	0.0	0.0	100.0	0.0	0.0	Solent and South Downs	
Land North of The Rosary, Partridge Green	SA320	4.8	80	PGR1	More Vulnerable	Residential	3	100	0.0	0.0	0.0	WEST GRINSTEAD 1981	698.5	Western Adur	699	41.8	19.1	10.6	0.0	0.0	0.0	100.0	0.0	0.0		
Land South of Smugglers Lane, Barns Green	SA006	3.3	50	BGR1	More Vulnerable	Residential	4	100	0.0	0.0	0.0		3248.0	River Arun	428	34.3	13.2	9.9	0.0	0.0	0.0	100.0	0.0	0.0		
Land West of Stream House, Thakeham	SA873	1.9	40	TH2	More Vulnerable	Residential	4	100	0.0	0.0	0.0		861.7	Unnamed Tributary of the River Chilt	697	12.4	6.4	3.0	0.0	21.0	23.0	56.1	0.0	0.0		
Land at Hatches Estate, West Chiltington	SA066	0.9	20	WCH1	More Vulnerable	Residential	5	100	0.0	0.0	0.0		1653.3	Unnamed Tributary of the River Chilt	1245	12.4	0.9	0.1	0.0	0.0	0.0	100.0	0.0	0.0		
Land South of Muntham Drive, Barns Green	SA510	1.9	25	BGR2	More Vulnerable	Residential	5	100	0.0	0.0	0.0		3129.0	River Arun	440	14.8	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land North of The Rise, Partridge Green	SA274	4.2	55	PGR2	More Vulnerable	Residential	5	100	0.0	0.0	0.0	WEST GRINSTEAD 1981	1412.4	Western Adur	1248	17.0	9.3	6.5	0.0	0.0	0.0	100.0	0.0	0.0		
Land West of Southwater	SA119n	112.8	700	STRATEGIC	More Vulnerable	Residential	5	100.00	0.0	0.0	0.0		1224.1	River Arun	179	10.9	3.0	1.7	0.0	1.6	0.1	98.3	0.0	0.0		
Land South of Northlands Lane, Storrington	SA732	6.2		STO1	More Vulnerable	Residential	5	100	0.0	0.0	0.0	STORRINGTON 1981	673.2	River Stor	35	1.2	0.0	0.0	5.0	5.6	16.2	73.2	0.0	0.0	Solent and South Downs	
Land at Mercer Road, Horsham	SA568	14.3	300	HOR2	More Vulnerable	Residential	5	100	0.0	0.0	0.8		30.7	Boldings Brook	32	19.1	8.2	5.1	0.0	0.0	0.0	100.0	0.0	0.0		
Land at the Old School Site, Itchingfield	SA522	1.7	20	BGR3	More Vulnerable	Residential	5	100	0.0	0.0	0.0		1530.4	River Arun	349	27.1	0.5	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land At Cyder Farm, Crabtree, Lower Beeding	SA892	0.1	6	LWB3	More Vulnerable	Residential	5	100	0.0	0.0	0.0		3867.2	Cowfold Stream	361	10.1	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Fields West of Cowfold, South of A272, Cowfold	SA610	5.1	35	CW2	More Vulnerable	Residential	5	100	0.0	0.0	0.0		1216.3	Cowfold Stream	417	11.8	3.9	2.1	0.0	0.0	0.0	100.0	0.0	0.0		
Fields West of Little Potters, Cowfold	SA611	0.4		CW2	More Vulnerable	Residential	5	100	0.0	0.0	0.0		1375.9	Cowfold Stream	636	15.1	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land South West of Hop Oast Roundabout	SA703	10508.2		EM1	Less Vulnerable	Employment	5	100	0.0	0.0	0.0		1690.3	River Arun	752	33.9	9.4	6.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land South of Broomers Hill Park, Pulborough	SA385	27343.3		EM3	Less Vulnerable	Employment	5	100	0.0	0.0	0.0		1903.1	River Arun	1632	24.5	6.1	2.6	0.0	0.0	0.0	100.0	0.0	0.0		
Land at Rusper Glebe, Rusper	SA080	0.6	12	RS1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		1203.0	River Mole	894	4.6	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land North of High Bar Lane, Thakeham	SA039	1.0	25	TH1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		727.0	Unnamed Tributary of the River Chilt	563	1.0	0.0	0.0	0.0	0.0	5.1	94.9	0.0	0.0		
Land at Rock Road, Storrington	SA384	3.6	55	STO2	More Vulnerable	Residential	7	100	0.0	0.0	0.0		1428.8	River Stor	180	1.7	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land at Trinity Cottage, Lower Beeding	SA584	0.5	7	LWB2	More Vulnerable	Residential	7	100	0.0	0.0	0.0		3071.8	River Arun	915	0.9	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land West of Smock Alley, West Chiltington	SA429	2.5	15	WCH2	More Vulnerable	Residential	7	100	0.0	0.0	0.0		252.1	Unnamed Tributary of the River Chilt	252	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		

Site Address	Site Name	Area (Ha)	Capacity	Reference	Vulnerability	Dev. Type	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Recorded Flood Outline within 500m	Distance to Main River (m)	Name of Main River	Distance to Ordinary Watercourse (m)	Proportion of Site within 1000 year RoFSW (%)	Proportion of Site within 100 year RoFSW (%)	Proportion of Site within 30 year RoFSW (%)	Proportion Overlap with Geosmart GW Class 1 - High (%)	Proportion Overlap with Geosmart GW Class 2 - Moderate (%)	Proportion Overlap with Geosmart GW Class 3 - Low (%)	Proportion Overlap with Geosmart GW Class 4 - Negligable (%)	Proportion of Site at risk from Reservoir Failure - Dry day (%)	Proportion of Site at risk from Reservoir Failure - Wet day (%)	Flood Warning Area	Flood Alert Area
Land East of Hatches House, West Chiltington	SA500	0.5	15	WCH3	More Vulnerable	Residential	7	100	0.0	0.0	0.0		1550.1	Unnamed Tributary of the River Chilt	1416	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land at Highfields, Pulborough	SA556	1.2	25	PLB1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		827.9	River Arun	828	0.0	0.0	0.0	0.0	0.4	5.2	94.4	0.0	0.0		
Land East of Moudsell Close, Ashington	SA866	2.2	75	ASN1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		3309.5	Unnamed Tributary of the River Chilt	192	2.2	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
The former Pig Farm, Bucks Green	SA794	0.3	6	RD2	More Vulnerable	Residential	7	100	0.0	0.0	0.0		278.6	River Arun	202	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land North of East Street, Rusper	SA872	0.9	20	RS2	More Vulnerable	Residential	7	100	0.0	0.0	0.0		859.0	River Mole	760	0.1	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land North of Guildford Road, Bucks Green	SA574	5.0	60	RD1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		293.6	River Arun	93	2.6	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land East of Billingshurst with school and rosier	SA118	47.1	650	STRATEGIC	More Vulnerable	Residential	7	100	0.0	0.0	0.0	BILLINGSHURST 1981 BILLINGSHURST 1976 BILLINGSHURST 1982	171.4	Par Brook	625	7.6	2.8	1.7	0.0	0.0	0.0	100.0	0.0	0.0		
Land at Dunstans Farm, Shermanbury	SA433	7.1	120	PGR3	More Vulnerable	Residential	7	100	0.0	0.0	0.0	WEST GRINSTEAD 1981	1491.0	Eastern Adur	974	3.9	0.2	0.2	0.0	0.0	0.0	100.0	0.0	0.0		
Land at Sandgate Nurseries, Henfield	SA317	3.8	55	HN1	More Vulnerable	Residential	7	100	0.0	0.0	0.0	HENFIELD 1974	1065.1	Eastern Adur	158	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land to the North of Melton Drive, Storrington	SA361	4.8	70	STO1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		510.7	River Stor	105	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Land West of Shoreham Road, Henfield	SA538	5.4	40	SMD1	More Vulnerable	Residential	7	100	0.0	0.0	0.0	Upper Beeding 1975	512.1	Woodsmill Stream	513	5.3	1.9	1.3	0.0	0.0	0.0	100.0	0.0	0.0		
Land South of Bell Road, Warnham	SA071	1.4	20	WRN1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		407.6	Boldings Brook	411	2.0	0.8	0.4	0.0	0.0	0.0	100.0	0.0	0.0		
Land at Glayde Farm, West of Church Lane, Lower Beeding	SA567	4.6	30	LWB1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		3024.4	River Arun	726	2.5	0.5	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Field West of Cowfold, North of A272, Cowfold	SA609	3.0	35	CW1	More Vulnerable	Residential	7	100	0.0	0.0	0.0		1438.2	Cowfold Stream	719	2.4	0.5	0.0	0.0	0.0	0.0	100.0	0.0	0.0		
Graylands Estate West, Langhurstwood Road, Horsham	SA363w	40009.9		EM2	Less Vulnerable	Employment	7	100	0.0	0.0	0.0		479.1	Boldings Brook	479	0.2	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0		

Appendix 2: Assessment of Reasonable Alternatives

Site Address	SHELAA Ref	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Reason for seeking alternative	HA2	BRH1	HOR1	STE1	EM1	Reasonable Alternative For	Reason for rejection
Land West of Ifield, Rusper	SA101	1	86	3.9	10.3	14.4	Proportion of site within Flood Zone 2/3 and with future flood risk	Y					n/a	Assess alternatives
Land South of Lower Broadbridge Farm, [Slinfold Parish]	SA386	1	94	2.8	2.9	5.9	Proportion of site within Flood Zone 2/3 and with future flood risk		Y				n/a	Assess alternatives
Land at Hornbrook Farm, Horsham	SA074	1	93	1.8	5.4	7.2	Proportion of site within Flood Zone 2/3 and with future flood risk			Y			n/a	Assess alternatives
Land at Glebe Farm, Steyning	SA742	2	100	0.0	0.0	9.2	Proportion of site within Flood Zone 2/3 and with future flood risk				Y		n/a	Assess alternatives
Land South of Star Road, Partridge Green	SA063	2	100	0.1	0.0	6.5	Future flood risk					Y	n/a	Assess alternatives
Land North of Lower Broadbridge Farm [Slinfold Parish]	SA102	1	89.0	4.1	6.9	11.1			BRH1				BRH1	The site is in close proximity to the existing commercial uses to the east and south it is considered that the potential impact on the amenity of future users (e.g. noise and lighting) means this site is not suitable for residential development. Development for housing could also have a negative impact on the operation of existing employment sites.
Land East of Lordings Road, Bridgewaters Farm, Billingshurst	SA409	1	83.5	7.5	9.0	16.6			BRH1				BRH1	The site does not relate well to the existing settlement boundary, is separated from the rest of the village by the A29 national speed limit bypass, and it is too large scale for the needs of the village taking into account other more appropriate sites recommended for local plan allocation. It has not been presented in a unified scheme together with other proposals for strategic development in this area, limiting the coordinated deliverability of the site.
Land Adjacent to Lyons Farm, Slinfold	SA492	1	80.7	5.8	13.5	19.9			BRH1				BRH1	Development has been assessed to have a significant negative landscape impact and would result in the creation of urban sprawl into the countryside beyond Broadbridge Heath. The site in isolation does not relate well to the existing urban form of Broadbridge Heath and is not considered to be in a sustainable location to deliver housing.
Land at Bridgewater Farm (west of the A29) Billingshurst	SA642	1	93.7	4.7	1.6	6.5			BRH1				BRH1	The site does not have potential for allocation for housing/mixed use development because it would have a significant landscape impact and does not relate well to the existing settlement boundary, it is relatively large scale and has not been presented in a unified scheme together with other proposals for strategic development in this area, limiting the deliverability of the site.
Land off Coneyhurst Road, Rosier Park, Billingshurst	SA757	1	97.1	0.0	2.9	4.3			BRH1				BRH1	Development on this site would have negative landscape impacts and extend Billingshurst's settlement boundary to the south east. Further, part of the site is identified to be at risk to flooding. There is insufficient survey evidence or impact assessments to clearly demonstrate the extent to which the site may be developable.
Land at Andrews Hill Farm, Billingshurst	SA759	1	97.2	1.6	1.3	2.8			BRH1				BRH1	The site does not relate well to the existing settlement boundary given its configuration and the separation caused by the A29, and would have a significant landscape impact, bringing Billingshurst south towards Adversane and significantly altering the village form.
Lower Broadbridge Farm, Broadbridge Heath	SA766	1	84.5	1.7	13.8	15.5			BRH1				BRH1	The site lies within a Building Stone Minerals Safeguarding Area with the access and processing area forming part of the safeguarding associated with Theale Farm. Further, development of this site would be dependent on the relocation of Horsham Stone & Reclamation which could be problematic. There are also significant concerns regarding the heritage impacts on the adjacent Grade II listed building Lower Broadbridge Farm.
Land at Buck Barn, West Grinstead (Weald Cross)	SA716	1	93.1	1.0	5.9	6.9		✓					HA2	The Council's sustainability appraisal has identified that urban extensions are more sustainable than new settlements. This site was the least well performing of the potential strategic sites when assessed against SA objectives, and the least favourable when considered against the Local Plan objectives. Given the impact of water neutrality on the plan this site is therefore not suitable for allocation.
Land at Kingsfold, Warnham (North West Horsham)	SA459	1	92.6	1.3	6.1	7.4		✓		✓			HA2, HOR1	The Council's sustainability appraisal has identified that urban extensions are more sustainable than new settlements. This site is not recommended for allocation due to a combination of the adverse environmental impacts, the difficulty in delivering a cohesive community which is not significantly reliant on other settlements, and lack of certainty as to the deliverability and viability of the scheme.

Site Address	SHELAA Ref	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Reason for seeking alternative	HA2	BRH1	HOR1	STE1	EM1	Reasonable Alternative For	Reason for rejection
Land West of Billingshurst (Newbridge Park North)	SA744n	1	83.3	5.7	11.0	16.7		✓	✓				HA2, BRH1	Whilst this site would help deliver housing to meet the required targets, it is not considered this scheme would deliver a cohesive neighbourhood that is well linked to the existing development in Billingshurst. Development would also have impacts on the landscape, biodiversity and heritage close to the site. To date limited information has been provided to the Council to help demonstrate how the environmental, community and transport impacts can be resolved. The site is not recommended for allocation.
Land West of Billingshurst (Newbridge Park SE)	SA744w	1	74.5	7.5	18.1	25.5		✓	✓				HA2, BRH1	Whilst this site would help deliver housing to meet the required targets, it is not considered this scheme would deliver a cohesive neighbourhood that is well linked to the existing development in Billingshurst. Development would also have impacts on the landscape, biodiversity and heritage close to the site. To date limited information has been provided to the Council to help demonstrate how the environmental, community and transport impacts can be resolved. The site is not recommended for allocation.
Land West of Bines Road, Partridge Green	SA891	2	99.1	0.9	0.0	18.2						✓	EM1	The site has not been allocated on the grounds on heritage, landscape and with a number of sites being promoted in Partridge Green which relate better to the built-up area boundary of Partridge Green and its facilities and have fewer constraints including landscape and heritage. Furthermore, the proposal would result in a discordant extension of the village form as it increases the village footprint west of Bines Road and the Downslink in a somewhat detached extension of the settlement and against the prevailing historic pattern of the village. Therefore, it is the Council's view that development at this location and at the quantum proposed is not suitable for allocation
Land at Kings Barn Farm, Steyning	SA608	2	98.6	1.1	0.3	50.9					✓		STE1	Development on the site would have a negative impact on settlement form and landscape, in particular as affects the setting of the National Park. There is insufficient evidence that concerns regarding heritage, flood risk, impact on recreational amenity and biodiversity could be overcome.
Land north of Church Farm Walk, Upper Beeding	SA629	2	100.0	0.0	0.0	1.7					✓		STE1	The site is highly sensitive to development in terms of heritage and biodiversity which cannot be mitigated against significant harm. The setting of the Grade II* church and direct impact of the Local Wildlife site would be negatively affected by a housing development proposal. The edge of village location would be further urbanised with the proposed housing in this location and would impact negatively on the rural character in this place
Land South of Hogs Wood, Southwater,	SA725	4	100.0	0.0	0.0				✓				BRH1	The presence of ancient woodland would constrain the net developable area suitable for development and the lack of evidence that the site could deliver safe, appropriate access means it is unclear whether the site can be implemented and delivered.
Lanaways Farm, Southwater	SA329	4	100.0	0.0	0.0				✓				BRH1	Located away from the settlement edge and isolated rural location.
Land west of The Copse, Southwater	SA408	4	100.0	0.0	0.0				✓				BRH1	Access to the site needs to be demonstrated (it is not currently accessible to the wider road network, and the only access would be through Site SA324). It is also not clear how development on site could be delivered in light of how widely the revised Tree Preservation Order (TPO/1543).
Land south of Eastlands Lane, Cowfold	SA747	5	100.0	0.0	0.0							✓	EM1	The site is not recommended for allocation due to the very negative impacts on environmental considerations. Substantial improvements to road access would also be necessary.
Land at Worthing Road and Tower Hill	SA599	5	100.0	0.0	0.0				✓				BRH1	The site is located outside of the built-up area boundary of Horsham, in the countryside, and would extend built form beyond the railway line, a defensible boundary and create coalescence between Horsham and Tower Hill causing settlement coalescence between Horsham and Southwater.
The Fords/Oakwood House, Bonfire Hill	SA852	5	100.0	0.0	0.0				✓				BRH1	Located away from the settlement edge and isolated rural location.
Land at Adversane, West Chiltington (Kingswood)	SA597	5	100.0	0.0	0.0				✓				HA2	The Council's sustainability appraisal has identified that urban extensions are more sustainable than new settlements. While the site would help meet identified housing needs, it is geographically less well connected to the settlements of Horsham, Crawley and to the south coast and therefore does not meet wider sub regional requirements. It is detached from an existing established settlement and would be a village-sized settlement with limited opportunity for self-containment. It would be challenging to achieve sustainable travel habits, particularly in early phases.
Land east of Cowfold	SA366	7	100.0	0.0	0.0							✓	EM1	The site is not considered to be suitable or sustainable because of issues relating to heritage, landscape, biodiversity and the AQMA. Furthermore, the scale of development planned for the village would put stress on existing local infrastructure.
Land at Eastlands Farm, Cowfold	SA052	7	100.0	0.0	0.0							✓	EM1	The site is not considered suitable due to the very negative impacts on environmental considerations. Substantial improvements to road access would also be necessary.
Land at Brookhill, Cowfold	SA782	7	100.0	0.0	0.0							✓	EM1	The site is not recommended for allocation as it has very negative impacts on environmental considerations.
Land East of Eastlands Lane	SA791	7	100.0	0.0	0.0							✓	EM1	The site is not recommended for allocation due to its separation from the settlement edge and a number of environmental considerations including landscape, heritage and arboriculture which would negatively impact on the character of the village. Substantial improvements to road access would also be necessary.

Site Address	SHELAA Ref	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Reason for seeking alternative	HA2	BRH1	HOR1	STE1	EM1	Reasonable Alternative For	Reason for rejection
Land south of Kithurst Lane, Storrington	SA021	7	100.0	0.0	0.0						✓		STE1	Issues concerning heritage, landscape and impact on the setting of the National Park effectively prohibit the site from coming forward for development. Further to allocations under consideration as part of the Local Plan Review, the Storrington Sullington and Washington Neighbourhood Plan was 'made' in 2019 and delivers approx. 146 dwellings in and adjoining the village edge. The collective impact of allocating this site given issues concerning landscape and the national park in particular and all the sites under consideration in and adjoining Storrington would be considered inappropriate in terms of the cumulative burden on local infrastructure, local air quality and impacts on the social and environmental fabric of the village.
Land West of Storrington Road, Storrington	SA469	7	100.0	0.0	0.0						✓		STE1	The site is considered to be detached from the existing settlement pattern of the village and development at this location would impact negatively on the rural character and landscape. There are also concerns over the cumulative burden on landscape, local infrastructure, air quality and social impacts of allocating this site alongside other sites also under consideration, and the sites allocated in the Neighbourhood Plan.
Land adjacent to Clay Lane, Storrington	SA486	7	100.0	0.0	0.0						✓		STE1	The entire site, comprising parcels SA485 and SA486 is not recommended for allocation for housing. Issues concerning visual encroachment into open countryside in this sensitive location and the wider landscape, and the impact on the setting of the National Park, are considered to be prohibitive for this site to come forward for development – which would be significant in scale given the cumulative size of the site. There are also concerns over the cumulative burden on landscape, local infrastructure, air quality and social impacts of allocating this site alongside other sites also under consideration, and the sites allocated in the Neighbourhood Plan.
Land to the rear of Fairlands, Storrington Rd	SA499	7	100.0	0.0	0.0						✓		STE1	The site does not relate well to the existing built form of either Storrington or Thakeham and would impact on the rural character and visually encroach into the wider countryside in this location. Further issues relating to heritage and biodiversity may also impact on the site coming forward. It is also not convenient to access local village services by sustainable means. There are also concerns over the cumulative burden on landscape, local infrastructure, air quality and social impacts of allocating this site alongside other sites also under consideration, and the sites allocated in the Neighbourhood Plan.
Highcroft, Hampers Lane, Storrington	SA501	7	100.0	0.0	0.0						✓		STE1	The development of High Croft and associated grounds would negatively affect the character and tranquillity of this low density area and would be contrary to the aims and objectives of the Heath Common SPD. There are also concerns over the cumulative burden on landscape, local infrastructure, air quality and social impacts of allocating this site alongside other sites also under consideration, and the sites allocated in the Neighbourhood Plan.
Land West of Greenacres Storrington	SA763	7	100.0	0.0	0.0						✓		STE1	The site has extant planning permission
Storrington Tennis Club	SA865	7	100.0	0.0	0.0						✓		STE1	Site is within built up area boundary therefore not considered for allocation in the Local Plan as principle of development considered acceptable
Land north of Furners Lane, Henfield	SA005	7	100.0	0.0	0.0						✓	✓	STE1, EM1	the scale of development proposed would have a negative impact on the wider landscape and in on the character of the village. Further clarification also is sought on access arrangements and providing an adequate, safe vehicular access via the existing housing development located to the west of the site rather than Furners Lane which is single width and contributes towards the setting of the Henfield Conservation Area.
Land Rear of Hollands Lane, Henfield	SA035	7	100.0	0.0	0.0						✓	✓	STE1, EM1	The site is promoted for housing with access dependent on SA487 which is currently occupied by employment uses and would impact the amenity of potential residents. Residential vehicular traffic would access with commercial vehicles and potential conflict between these different uses would need to be addressed. With medium and long views from SA035 to the south, and a negative landscape impact concluded, development in this location would be visually intrusive into the wider open countryside. Given an alternative site has been assessed more preferably in this assessment, together with cumulative impacts on village infrastructure and wider limits on housing growth in the District as a result of the water neutrality requirement, the site is not recommended for allocation.
The Copse, Worthing Road, Southwater	SA324	7	100.0	0.0	0.0								BRH1	The site is not suitable for development because of presence of TPOs and the intensification of development at this edge of settlement location would impact negatively on the character of the area which is located on the edge of settlement location
Land off Marringdean Road, Billingshurst	SA560	7	100.0	0.0	0.0								BRH1	There are issues relating to landscape capacity and biodiversity constraints. Furthermore, the site is not particularly well related to the existing services and facilities in Billingshurst and facilities do not form part of the proposal. Given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impacts of development, the Council considers it would be inappropriate to allocate further sites for development in the settlement

Site Address	SHELAA Ref	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Reason for seeking alternative	HA2	BRH1	HOR1	STE1	EM1	Reasonable Alternative For	Reason for rejection
Land at Kingsfold Cottage, Marringdean Road, Billingshurst	SA607	7	100.0	0.0	0.0				✓				BRH1	Development of this site would extend the village further into the open countryside in an area identified for limited capacity for development. Biodiversity assessments are also required to assess if protected species are impacted from development. Given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impacts of development, the Council considers it would be inappropriate to allocate further sites for development in the settlement.
Blackthorne Barn, Billingshurst	SA656	7	100.0	0.0	0.0				✓				BRH1	Given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impacts of development, the Council considers it would be inappropriate to allocate further sites for development in the settlement
Kingsmead, North of Marringdean Road, Billingshurst	SA678	7	100.0	0.0	0.0				✓				BRH1	There are issues relating to landscape capacity and biodiversity constraints. The site is not particularly well related to the existing services and facilities in Billingshurst on which it would rely and sustainable transport links to these sites are currently limited. Development would lead to urbanisation and extension of the settlement form to the south east. Given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impacts of development, the Council considers it would be inappropriate to allocate further sites for development in the settlement
Land at Kingslea Farm, Billingshurst	SA043	7	100.0	0.0	0.0				✓				BRH1	Located away from the settlement edge and isolated rural location.
Old Reservoir Farm, Billingshurst	SA698	7	100.0	0.0	0.0				✓				BRH1	Site is located east of a new urban extension of Billingshurst. Development would extend the urban form further into the open countryside contributing to a further urbanisation of the edge of settlement location. The site is further from services and facilities in Billingshurst village centre. In addition, the site is not particularly well related to the existing services and facilities in Billingshurst on which it would rely and sustainable transport links to these sites are currently limited. Given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impacts of development, the Council considers it would be inappropriate to allocate further sites
Land North West of Hilland Roundabout	SA668e	7	100.0	0.0	0.0			✓					HA2	Whilst this site would help deliver housing to meet the required targets, it is not considered this scheme would deliver a cohesive neighbourhood that is well linked to the existing development in Billingshurst. Development would also have impacts on the landscape, biodiversity and heritage close to the site. To date limited information has been provided to the Council to help demonstrate how the environmental, community and transport impacts can be resolved. The site is not recommended for allocation.
Land South of Hilliers Garden Centre, Forest	SA570	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	In terms of residential development, the site does not relate well with the existing settlement pattern, as it would be separated from the built form of the town, and access would be required through the garden centre or other commercial uses. In addition, development would be hindered by a number of issues such as those relating to Ancient Woodland, amenity impacts upon the adjacent dwellings, and the public right of way.
Land south of Athelstan Way, Horsham	SA060	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	The site abuts the built up area boundary of Horsham to the north and east but lies outside the settlement boundary. The site lies within Chesworth Farm, which is an open area popular with local residents and of high amenity value and is also designated as a Local Wildlife Site. The landscape is highly sensitive to development, particularly in the north of the site, with sloping topography increasing the visual impact of any development on views from Public Rights of Way. Tree Protection Orders covering trees along the northern and eastern boundaries would likely render parts of the site unsuitable for development with the implementation of appropriate buffer areas.
The Hermitage, Tower Hill, Horsham	SA416	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	Located away from the settlement edge and isolated rural location.
Land North of Parthings Lane, Tower Hill, Horsham	SA435	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	Although this site adjoins the built-up area of Horsham, it is south of the railway line which provides a clear boundary to the town and limiting the relationship of the land with the wider town. The landscape south forms an important part of the visual separation between Horsham and both Tower Hill and Southwater and is rural in character. New development would therefore lead to the coalescence of Horsham with Tower Hill and significant adverse landscape impacts.
Land at Bens Acre, Horsham	SA728	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	The site is not considered deliverable due to insufficient information being provided
Land at Graylands and Morris Farm	SA750	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	The site is not recommended for allocation because there are significant concerns relating to landscape impacts and the deliverability of these additional parcels within the plan period.
Land at Huntley Farm Old Holbrook	SA751	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	The site is not recommended for allocation because there are significant concerns relating to landscape impacts and the deliverability of these additional parcels within the plan period.

Site Address	SHELAA Ref	Ranking	Proportion of Site within Flood Zone 1 (%)	Proportion of Site within Flood Zone 2 (%)	Proportion of Site within Flood Zone 3a/3b (%)	Proportion of Site within the Modelled Fluvial and Tidal Extents (%)	Reason for seeking alternative	HA2	BRH1	HOR1	STE1	EM1	Reasonable Alternative For	Reason for rejection
Land rear of Hawthorns, Horsham	SA785	7	100.0	0.0	0.0			✓		✓			HA2, HOR1	The site is not recommended for allocation. The landscape is highly sensitive to development, with sloping topography increasing the visual impact of any development on views from popular Public Rights of Way. The amount of development on the site may fall below the site allocation threshold and vehicular access into the site requires further clarification before it could be considered capable of accommodating development.
Land West of Billingshurst (Platts Island South)	SA225s	7	100.0	0.0	0.0			✓	✓				HA2, BRH1	Whilst this site would help deliver housing to meet the required targets, it is not considered this scheme would deliver a cohesive neighbourhood that is well linked to the existing development in Billingshurst. Development would also have impacts on the landscape, biodiversity and heritage close to the site. To date limited information has been provided to the Council to help demonstrate how the environmental, community and transport impacts can be resolved. The site is not recommended for allocation.
Land West of Billingshurst (Newbridge Park South)	SA744s	7	100.0	0.0	0.0			✓	✓				HA2, BRH1	Whilst this site would help deliver housing to meet the required targets, it is not considered this scheme would deliver a cohesive neighbourhood that is well linked to the existing development in Billingshurst. Development would also have impacts on the landscape, biodiversity and heritage close to the site. To date limited information has been provided to the Council to help demonstrate how the environmental, community and transport impacts can be resolved. The site is not recommended for allocation.

Appendix 3 – Exception Tests

HA2 Land West of Ifield, Rusper

Risk ranking	Vulnerability	Flood zones
1	More vulnerable	1, 2, 3

An Exception Test is required for 'more vulnerable' development, including residential development, 'essential infrastructure' and 'highly vulnerable' development. To demonstrate the Exception Test can be passed (where applicable), it will be necessary to provide evidence that the development can provide sustainability benefits which outweigh the risk of flooding and produce a Flood Risk Assessment which demonstrates that the users of the development will be safe for their lifetime, taking into account the vulnerability of the users without making flood risk worse elsewhere, and reducing flood risk offsite where possible.

Assessment against NPPF paragraph 169:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk.

The delivery of the site will significantly increase the supply of housing, including specialist accommodation in the district, thereby contribution to the housing requirement and addressing the housing need which has been identified in the District Plan to 2040.

The proposal is for a large-scale urban extension to Crawley, but within the Horsham District boundary meaning it is in close proximity to a main population and employment centre. The site would deliver a substantial number of affordable homes to help meet local need.

The development is likely to deliver a range of facilities through the creation of a neighbourhood community, with evidence to demonstrate that a multi-modal access to the site can be delivered, as well as a community and education hub with sites for both primary and secondary schools, green infrastructure, active travel links and a priority bus route to establish access to existing public transport networks and encourage public transport use.

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

The majority of the site lies within Flood Zone 1, however there are parcels within Flood Zones 2 and 3, particularly along the River Mole Corridor and its tributaries, including Ifield Brook. The scale of the site means that the emerging masterplan can respond to this and not include development on any area of land classified as Flood Zone 2 or 3.

The potential for impacts on the River Mole and its tributaries are recognised, therefore development should be supported by hydraulic modelling of the Upper River Mole, which will require liaison with the Environment Agency. A Flood Risk Assessment should also be undertaken for the site to inform further master planning for the site, which should be informed by any site-specific recommendations proposed in the SFRA Update (2024) (CC04).

The landscape is relatively flat and has heavy clay soils across most of the site which has

the potential for drainage impacts, and the presence/risk of surface water flooding is noted. It is proposed that mitigation should be delivered through sustainable drainage systems (SuDs) appropriate for the site conditions.

Given that the emerging masterplan limits development to Flood Zone 1, and on the basis of good prospect of a comprehensive SuDs strategy being implemented, it is concluded that the development can be considered for allocation.

BGR1 – Land South of Smugglers Lane, Barns Green

Risk ranking	Vulnerability	Flood zones
4	More vulnerable	1

An Exception Test is not required in accordance with Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change.

Can development be made throughout its lifetime without increasing flood risk elsewhere?

As part of the site is at risk of flooding from surface water, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation in accordance with the guidance set out in the SFRA Update (2024) (CC04) and the advice of the EA. Development should be avoided in flow paths. A surface water drainage strategy should be provided which utilises Sustainable Drainage Systems to reduce the rate of discharge to greenfield runoff rates in accordance with the guidance set out in the SFRA and advice of the Lead Local Flood Authority (LLFA) – (West Sussex County Council (WSSCC) in this instance). The drainage strategy should address any isolated patches of surface water flooding on site.

HOR1 – Land at Hornbrook Farm, Horsham

Risk ranking	Vulnerability	Flood zones
1	More vulnerable	1, 2, 3

An Exception Test is required for 'more vulnerable' development, including residential development, 'essential infrastructure' and 'highly vulnerable' development. To demonstrate the Exception Test can be passed (where applicable), it will be necessary to provide evidence that the development can provide sustainability benefits which outweigh the risk of flooding and to produce a Flood Risk Assessment which demonstrates the users of the development will be safe for their lifetime, taking into account the vulnerability of the users without making flood risk worse elsewhere, and reducing flood risk offsite where possible.

Assessment against NPPF paragraph 169:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk.

The delivery of the site will increase the supply of housing in the district, thereby contribution to the housing requirement and addressing the housing need which has been identified in the District Plan to 2040.

The proposal is for an urban extension residential scheme adjacent to Horsham, the main town in the District and the most sustainable settlement in the District, providing access to services, facilities and employment as well as public transport links. Development will also provide a proportion of affordable housing.

Whilst it is recognised that consideration will need to be given to the landscape and heritage setting of the site to ensure site layout and capacity takes consideration of the site's context, the proposal also seeks to improve recreational amenity through the extension of Riverside Walk.

On this basis, the site's sustainability is considered to outweigh the flood risk, particularly given that the areas of the site in flood zones 2 and 3 can be excluded from the built development envelope.

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

The majority of the site lies within Flood Zone 1, however a small area alongside the Hornbrook Stream is within Flood Zones 2 and 3. As part of the site is located in Flood Zone 3, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation in accordance with the guidance set out in the SFRA and the advice of the EA. The assessment will also need to account for the risk of flooding from surface water. Development in flow paths should be avoided. A surface water drainage strategy should be provided which utilises Sustainable Drainage Systems to reduce the rate of discharge to greenfield runoff rates in accordance with the guidance set out in the SFRA and advice of the LLFA (WSCC). The drainage strategy should address any isolated patches of surface water flooding on site. No development should be located in Future Flood Zone 3b unless a reduced Flood Zone 3b extent can otherwise be demonstrated through modelling.

BRH1 – Land at Lower Broadbridge Farm, Broadbridge Heath

Risk ranking	Vulnerability	Flood zones
1	More vulnerable	1, 2, 3

An Exception Test is required for 'more vulnerable' development, including residential development, 'essential infrastructure' and 'highly vulnerable' development. To demonstrate the Exception Test can be passed (where applicable), it will be necessary to provide evidence that the development can provide sustainability benefits which outweigh the risk of flooding and to produce a Flood Risk Assessment which demonstrates the users of the development will be safe for their lifetime, taking into account the vulnerability of the users without making flood risk worse elsewhere, and reducing flood risk offsite where possible.

Assessment against NPPF paragraph 169:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk.

The delivery of the site will increase the supply of housing in the district, thereby contribution to the housing requirement and addressing the housing need which has been identified in the District Plan to 2040. Development on this site would also provide a proportion of affordable housing.

The proposal is for an urban extension residential scheme adjacent to Broadbridge Heath, which has a good range of services and facilities and is able to accommodate development sustainably. The site also has access to nearby Horsham, with a wider range of services, facilities and employment opportunities. As well as residential development, open space, trim trails and play space are proposed.

On this basis, the site's sustainability is considered to outweigh the flood risk, particularly given that the areas of the site in Flood Zones 2 and 3 could be excluded from development.

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

The majority of the site lies within Flood Zone 1, however a small area on the western edge of the site which, overall, is considered to have less development potential than the east of the site, is within Flood Zones 2 and 3.

As part of the site is located in Flood Zone 3, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation in accordance with the guidance set out in the SFRA and the advice of the EA. The assessment will also need to account for the risk of flooding from surface water. Development in flow paths should be avoided. A surface water drainage strategy should be provided which utilises Sustainable Drainage Systems to reduce the rate of discharge to greenfield runoff rates in accordance with the guidance set out in the SFRA and advice of the LLFA (WSCC). The drainage strategy should address any isolated patches of surface water flooding on site. No development should be located in Future Flood Zone 3b unless a reduced Flood Zone 3b extent can otherwise be demonstrated through modelling.

PGR1 – Land North of the Rosary

Risk ranking	Vulnerability	Flood zones
3	More vulnerable	1

An Exception Test is not required in accordance with Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change.

Can development be made throughout its lifetime without increasing flood risk elsewhere?

As part of the site is at risk of flooding from surface water, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation in accordance with the guidance set out in the SFRA Update (2024) (CC04) and the advice of the EA. Development should be avoided in flow paths. A surface water drainage strategy should be provided which utilises Sustainable Drainage Systems to reduce the rate of discharge to greenfield runoff rates in accordance with the guidance set out in the SFRA and advice of the LLFA (WSCC). The drainage strategy should address any isolated patches of surface water flooding on site.

STE1 – Land at Glebe Farm, Steyning

Risk ranking	Vulnerability	Flood zones
2	More vulnerable	1

An Exception Test is not required in accordance with Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change.

Can development be made throughout its lifetime without increasing flood risk elsewhere?

The site's risk level reflects the likely future risk of fluvial flooding on a small proportion of the site (9.2%) as assessed as part of the Sequential Test. A Flood Risk Assessment should be provided as part of any application to demonstrate what measures will be taken to address this and ensure that development, directed away from the area, will not increase flood risk off-site.

TH2 – Land West of Stream House, Thakeham

Risk ranking	Vulnerability	Flood zones
4	More vulnerable	1

An Exception Test is not required in accordance with Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change.

Can development be made throughout its lifetime without increasing flood risk elsewhere?

As part of the site is at risk of flooding from surface water, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation in accordance with the guidance set out in the SFRA Update (2024) (CC04) and the advice of the EA. Development should be avoided in flow paths. A surface water drainage strategy should be provided which utilises Sustainable Drainage Systems to reduce the rate of discharge to greenfield runoff rates in accordance with the guidance set out in the SFRA and advice of the LLFA (WSCC). The drainage strategy should address any isolated patches of surface water flooding on site.

EM1 – Land South of Star Road, Partridge Green

Risk ranking	Vulnerability	Flood zones
2	Less vulnerable	1

An Exception Test is not required in accordance with Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change.

Can development be made throughout its lifetime without increasing flood risk elsewhere?

The site's risk level reflects the likely future risk of fluvial flooding on a small proportion of the site (6.5% to the south east) as assessed as part of the Sequential Test. A Flood Risk Assessment should be provided as part of any application to demonstrate what measures will be taken to address this and ensure that development, directed away from the area, will not make flood risk higher off-site.