



Strategic Flood Risk Assessment Level 2

Sequential and Exception Test Summary and Review Note

May 2022

Dover District Local Plan Regulation 19 Submission



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Planning and Flood Risk. Regulation 19 Dover Local Plan. A Sequential Approach to Site Selection (May 2022)

Introduction

1. Local Planning Authorities are required to undertake a Strategic Flood Risk Assessment to fully understand the flood risk in the area to inform Local Plan preparation.
2. In plan-making, local planning authorities are also required to apply the sequential test approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk.
3. The Council has undertaken a Strategic Flood Risk Assessment (2019) and a Level 2 Strategic Flood Risk Assessment (2021) to inform the preparation of the Local Plan and the selection of the proposed site allocations.
4. This paper uses the findings of the Level 1 and Level 2 SFRA for the District and sets out the results of the sequential test and exceptions test of the proposed site allocations, that was undertaken by officers, to inform the preparation of the new Local Plan.

Background

National Planning Policy Framework

5. The National Planning Policy Framework (NPPF) 2021 at paragraph 159 makes clear that development in areas of flood risk should be avoided and directed to areas of the lowest risk. Where development is necessary in flood areas, the NPPF states that development should be made safe for its lifetime without increased flood risk elsewhere. For the Local Plan this means that sites sought for development should be allocated in areas at the lowest risk of flooding. Where through the Local Plan site selection process, development maybe necessary in areas at risk of flooding, then the Policies in the Plan should set out levels of mitigation to make the development resilient to, and not increase the risk of flooding.

Planning Practice Guidance

6. The Planning Practice Guidance (PPG) provides detail on how development in a Local Plan should consider flood risk. Through a Strategic Flood Risk Assessment (SFRA) the Sequential Test¹ and where necessary an Exception Test² should be applied when determining land use allocations. The PPG makes clear the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk. All development proposed within the Local Plan is subject to the Sequential Test, if a site is found in Flood zone 1 then the test is passed for that site, if a site is found in Flood zone 2 or higher then the site subjected to the Exception Test, subject to the vulnerability classification of the development.

¹ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Sequential-Test-to-Local-Plan>

² <https://www.gov.uk/guidance/flood-risk-and-coastal-change#The-Exception-Test-section>

7. The PPG sets out that the Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. There are 2 parts to the Exception Test, firstly that the proposed development would provide wider sustainability benefits to the community that outweigh flood risk, and secondly, that the development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

Regulation 19 Pre-Submission Local Plan

8. The distribution of growth proposed in the Local Plan growth strategy is primarily based on the District's settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. Here, a key aim of the Local Plan growth strategy is to focus development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historical environment.
9. The Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield, where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create a new neighbourhood with supporting infrastructure. Approximately half of the District's new housing development is planned here, the majority of which is to be delivered as part of the urban expansion at Whitfield.
10. If the distribution of housing growth in the district were to purely follow the settlement hierarchy the secondary focus for development should be the District Centre of Deal, followed by the Rural Service Centres of Sandwich and Aylesham. However, Deal has seen high levels of windfall development over the past ten years, due to market demand, which has resulted in a limited supply of suitable housing sites. Housing delivery in Deal and Sandwich also continues to be constrained by a number of factors including: flood risk, wildlife sites, heritage and highways. Given this, it has been a challenge to identify suitable and available sites in Deal and Sandwich and the growth potential of these settlements is therefore currently considered to be relatively limited.
11. As a result, the remaining housing growth (not already identified at the main settlements of Dover Deal and Sandwich) is planned to be delivered through the strategic expansion of Aylesham, in line with the original vision conceived by Sir Patrick Abercrombie in 1928 for Aylesham to become a small garden town. In addition, there will be development in the rural area of the District, distributed across the District's local centres and large and small villages, taking into account existing constraints, site availability and the settlements position in the settlement hierarchy.
12. Here, a key part of the Council's growth strategy is to promote the sustainable development of rural areas, to support the vitality of rural communities in line with national policy. New housing can enable rural communities to retain and strengthen existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

13. As part of the Council's strategy for the rural area it is proposed to grow the adjacent villages of Eythorne and Elvington to create a new local centre in the District, with new services and facilities to be delivered alongside new homes.
14. Managing flood risk and coastal change has been identified as one of the key issues for the Local Plan to address. This is further iterated through the Plans Strategic Objective to create a Spectacular and Sustainable Environment by managing flood risk sustainably in a way that ensures the safety of residents and property and take opportunities to reduce flood risk where possible.
15. To accomplish the objective of managing flood risk sustainably a number of Policy criteria have been set out within the Local Plan, including:
- *Strategic Policy 1.8 Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production;*
 - *Strategic Policy 1.9 Improving water efficiency; and*
 - *Strategic Policy 1.10 Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.*
 - *Climate Change Policy 5 - Development on sites at risk of flooding must comply with the National Planning Policy Framework and associated guidance and will only be permitted as an exception and where it is demonstrated by a site-specific Flood Risk Assessment (FRA), carried out in accordance with the requirements set out in the Council's Strategic Flood Risk Assessment, that it would not result in an unacceptable risk of flooding on the site itself or elsewhere.*
 - *The FRA should be prepared in accordance with the guidance set out in the Council's 'Site-specific Guidance for Managing Flood Risk'. For development identified by the FRA to be at risk of flooding from any source, flood mitigation should be implemented in accordance with the Flood Risk Management hierarchy outlined in the document 'Site-specific Guidance for Managing Flood Risk'.*
 - *Where development does go ahead, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the flood level for Flood Zones 2 and 3 respectively, including an allowance for climate change.*
16. Furthermore, due to the identification of flood risk on a number of strategic and non-strategic site allocations in the Plan, policy criteria have also been included in the site allocation policies, requiring a site-specific flood risk assessment to be carried out and submitted with any planning application for development.
17. The approach to managing flood risk set out in the Regulation 19 Pre-Submission Local Plan has been informed by engagement with stakeholders, including the Environment Agency, at different stages in the Plan making process. Comments made as part of the Regulation 18 consultation on the draft Local Plan have been considered when updating the Plan for Regulation 19 and policies have been updated accordingly.

Strategic Flood Risk Assessment (2019)³

18. To inform the preparation of the new Local Plan a Strategic Flood Risk Assessment (SFRA) was carried out to identify areas at risk from flooding. The SFRA was published in 2019 and provides the latest planning policy context and flood risk information for the District. The SFRA:

- Identifies the risk of flooding from each source of flooding at key locations within the district;
- Assesses the impact that land use changes and development in the area will have on flood risk;
- Informed the Local Plans sustainability appraisal so that flood risk is taken into account when considering strategic land use policies;
- Provides data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary; and,
- Supports the Council's policies for the management of flood risk within Local Development Documents and assists with the testing of site proposals.

Strategic Flood Risk Assessment Level 2 (2021)⁴

19. A Level 2 SFRA was carried out in 2021 to inform the suitability and where necessary the potential for mitigation of sites considered for allocation within the Regulation 19 version of the Local Plan. The Level 2 SFRA applied the:

- Sequential Test⁵ by identifying the severity and variation on risk within medium and high flood areas:
- Established whether proposed allocations or windfall sites on which the Local Plan will rely are capable of being made safe through their lifetime without increasing flood risk elsewhere; and,
- Where required applied the Exception Test⁶.

Housing and Economic Land Availability Assessment

20. The Council has undertaken a Housing and Economic Land Availability Assessment (HELAA) to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. As part of this exercise a call for sites was carried out in 2017 inviting submissions of all types of site for development. To further the site options, specifically with reference to niche sites for need like Gypsy and Traveller and Self Build, a further targeted call for sites was carried out in 2021. All sites submitted were subjected to the HELAA assessment process. With regards

³ <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/strategic-flood-risk-assessment-2019-sfra.pdf>

⁴ <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/strategic-flood-risk-assessment-level-2-dec-2021.pdf>

⁵ NPPF 2021 paragraph 161. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

⁶ NPPF 2021 paragraph 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.

to flood risk, every site was subjected to GIS analysis to determine whether the site was within, or partially within, or within 400m of, an identified source of flood risk.

21. In addition to this, sites were also assessed against other criteria including, highways, landscape, biodiversity, heritage, environmental and sustainability (through proximity to settlement areas) to determine their suitability. Here, sites were assessed in relation to the level of impact they were considered to have on each assessment criteria. Sites were then ranked either Green, with little to no impact, or that the impact could be mitigated; Amber, a level of impact and further consideration of mitigation required; or Red, where the levels of impact were severe, and mitigation could not be accomplished. The Green and Amber assessed HELAA sites were then assessed against the Local Plan development strategy, which determined that development should be directed towards the most sustainable locations in accordance with the overarching growth strategy. With regards to Flood Risk, sites were only considered where there was an impact from the risk if they were in the most sustainable, and on balance, most suitable locations, against the Districts settlement hierarchy and growth strategy. For example, urban areas, or where flood risk mitigation could be accommodated, and where other sites on balance, against the assessment, had a greater negative impact.

Sustainability Appraisal

22. To inform and guide the preparation of the Local Plan a Sustainability Appraisal has been undertaken. The Appraisal focuses on the likely environmental effects of the Local Plan whilst also considering a range of matters extending to social and economic impacts. As part of the environmental effects, the sources of flood risk were considered by identifying the extent and level of risk within the District and the sites impacted. The sites and level of flood risk upon them was then assessed against the objectives of the Local Plan and the range of other planning matters including proposed policies within the Local Plan. The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward. It concluded that on all sites impacted by flood risk there was considered to be scope to avoid or significantly mitigate the impact through the policies in the Local Plan.

Process

23. The diagram below illustrates the Councils approach to the Sequential Test of sites identified through the Plan making process. The findings of this process are outlined below.

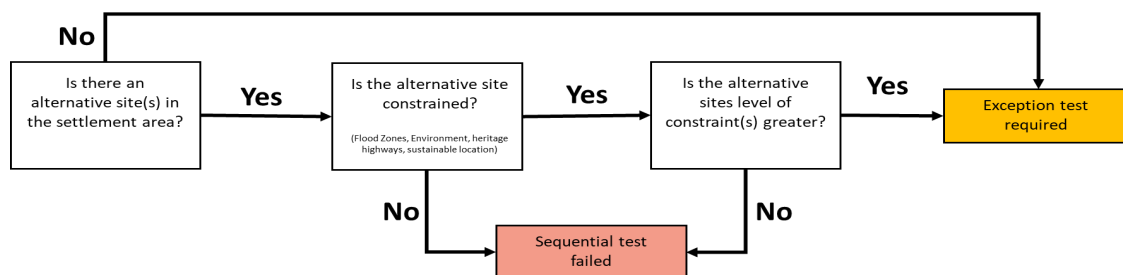


Diagram 1. Sequential Test process of sites in Flood Zone 2 and 3

Application of the Sequential Test

24. Officers have applied the Sequential Test to the proposed site allocations (housing, employment and Gypsy and Traveller pitches) in the Local Plan, based on the findings of the Level 2 SFRA and the results of the assessment are set out below:

Development Proposed in Flood Zone 1 and with a Low Chance of Surface Water Flooding

25. There were 103 sites considered in the Level 2 SFRA, of which 81 have been identified as being in Flood Zone 1 and at low risk of surface water flooding. These sites are considered to meet the requirements of the Sequential Test and are subsequently considered sites that avoid flood risk to people and property.

Table 1: Development Proposed in Flood Zone 1 and with a Low Chance of Surface Water Flooding

Sites in Flood Zone 1 and at 'very low' risk of flooding, smaller than 1 ha				
Reference	Site Address	Settlement	Site area (ha)	Capacity
DM10	Romany Acres, Caravan, Romany Acres, Belsey Lane, Ewell Minnis CT15 7DY	Ewell Minnis	0.25	4
TC4S026	Military Road	Dover	0.11	9
DM10	Plot 2B Bluebell Place (Bluebell Place), Ham, Eastry, CT13 0ED	Eastry	0.10	1
DM10	Plot 1A, Land at Hay Hill (The Oaklands), Ham, Eastry, CT13 0ED	Eastry	0.11	2
ASH015	Former Council Yard, Molland Lea, Ash	Ash	0.16	5

DM10	Plot 3 Strawberry Place (1 Strawberry Place), Ham, CT13 0ED	Eastry	0.19	2
TC4S028	Peverell Road	Dover	0.19	6
TC4S030	Colton Crescent	Dover	0.2	10
RIN004	Ringwould Alpines, Dover Road, Ringwould	Ringwould	0.22	5
DOV019	Albany Place Car Park, Dover	Dover	0.28	15
DOV008	Land adjoining 455 Folkestone Road, Dover	Dover	0.34	5
DOV030	Land at Durham Hill, Dover	Dover	0.34	10
ASH011	Guilton, Ash	Ash	0.78	10
SAN019	Sydney Nursery, Dover Road, Sandwich	Sandwich	2.05	10
ASH003	Land south of Mill Field	Ash	0.55	8
TC4S023	Land adjacent to Cross Farm	Eastry	0.44	10
CAP009	Longships, Cauldham Lane, Capel le Ferne	Capel le Ferne	0.49	10
TC4S082	Land Adjacent Mill House, Shepherdsweil	Shepherdsweil	0.58	10

STM007	Land to the west of Townsend Farm Road, St Margaret's at Cliffe (Site B)	St Margarets at Cliffe	0.63	18
STM008	Land to the west of Townsend Farm Road, St Margaret's at Cliffe (Site A)	St Margarets at Cliffe	0.63	18
TC4S074	Land adjacent Courtlands	Kingsdown	0.71	5
CAP013	Land at Cauldham Lane, Capel le Ferne	Capel le Ferne	0.76	50
GTM003	Land to the east of Northbourne Road, Great Mongeham	Great Mongeham	3.33	10
TC4S076	Statenborough Farm, Eastry	Eastry	0.82	0.81ha
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	Worth	0.83	15
WIN003	Land adjacent to Staple Road	Wingham	0.83	20
SHE013	Land around Coldred	Shepherdswell	0.83	5
Sites in Flood Zone 1 and at 'very low' risk of flooding, greater than 1 ha				
RIN002	Land at Ringwould Alpines, Dover Road, Ringwould	Ringwould	1.01	10
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	Nonington	1.14	35
WOO006	Land south of Sandwich Road, Woodnesborough	Woodnesborough	3.15	10

EYT008	Land on the southeastern side of Roman Way, Elvington	Eythorne and Elvington	1.65	50
SHE004	Land at Shepherdswell, between St Andrew's Gardens, Mill Lane and Meadow View Road	Shepherdswell	5.46	40
EYT012	Sweetbriar Lane, Elvington	Eythorne and Elvington	1.85	50
STM010	Land located between Salisbury Road and The Droveaway, St Margaret's-at-Cliffe	St Margarets at Cliffe	2.72	10
ELR4	Aylesham Development Area	Aylesham	4.2	
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	Kingsdown	3.46	50
WIN014	Footpath Field, Staple Road, Wingham	Wingham	3.60	50
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	Langdon	4.68	40
Sites in Flood Zone 1 with <40% of the site at risk of surface water flooding				
TC4S039	Chapel Hill, Eythorne	Eythorne and Elvington	0.21	5
STA004	Land at Durlock Road, Staple	Staple	0.24	3
AYL001	Land at Dorman Avenue North, Aylesham	Aylesham	0.31	9
DOV006	Land at Dunedin Drive (south), Dover	Dover	0.37	8

SHE008	Land off Mill Lane, Shepherdswell	Shepherdswell	0.38	10
AYL002	Land at Boulevard Courrieres, Aylesham	Aylesham	0.61	17
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	Woodnesborough	1.03	5
PRE003	Apple Tree Farm, Stourmouth Road	Preston	0.76	5
DOV022B	Land in Coombe Valley, Dover	Dover	0.91	40
PRE016	Site north of Discovery Drive, Preston	Preston	1.10	20
STM006	Land at New Townsend Farm, Station Road, St Margaret's	St Margaret's at Cliffe	13.35	10
TC4S050	Sherley's Farm	St Margarets at Cliffe	1.49	1
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	St Margarets at Cliffe	3.57	40
ASH014	Land to the south of Sandwich Road, Ash	Ash	3.34	60
DOV022E	Land in Coombe Valley, Dover	Dover	3.69	220
EAS002	Land at Buttsole Pond, Lower Street, Eastry	Eastry	3.93	80
CAP006	Land to the east of Great Cauldham Farm, Capel le Ferne	Capel le Ferne	6.35	50

EYT003	Land adjoining Terrace Road, Elvington	Eythorne and Elvington	8.07	150
DEA008	Land off Cross Road, Deal	Deal	8.73	100
TC4S083	The Citadel, Western Heights, Dover	Dover	14.82	TBD
TC4S120	WCBP Potential Phase 4	Whitfield	27.71	TBD
	Tilmanstone Spoil Tip, Elvington	Eythorne and Elvington	TBD	TBD
ELR7	White Cliffs Business Park Phases I-III	Whitfield	54.7	
AYL005	Land off Holt Street, Snowdown, Aylesham	Aylesham	41.77	40
GUS002	Connaughts Barracks, Dover	Dover	54.98	300
WIN004	Land adjacent to White Lodge, Preston Hill	Wingham	0.31	8
ALK003	Land at Short Lane, Alkham	Alkham	0.32	10
TC4S027	Roosevelt Road	Dover	0.32	10
CAP011	Former Archway Filling Station, New Dover Road, Capel le Ferne	Capel le Ferne	0.66	10
SHE006	Land west of Coxhill Road, Shepherdswell	Shepherdswell	0.82	10

EAS009	Eastry Court Farm, Eastry	Eastry	0.84	5
TC4S008	Bridleway Riding School, Station Road	Deal	1.09	25
DOV026	Westmount College, Folkestone Road, Dover	Dover	1.43	60
EYT001	Land at Monkton Court Lane	Eythorne and Elvington	1.94	20
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	Preston	2.53	40
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	Sandwich	3.43	40
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	Walmer	4.44	50
ASH004	Land to the north of Molland Lane, Ash	Ash	4.46	110
SHO002	Land southwest of Sandwich Road, Sholden	Sholden	23.68	100
TC4S092	Fort Burgoyne	Dover	7.69	TBD
AYL004	Farmland lying to the north of Aylesham and to the west of the B2046 (Adisham Road)	Aylesham	36.35	500
AYL003	Land to the south of Spinney Lane, Aylesham	Aylesham	132.22	640
WHI008	Whitfield Urban Expansion	Whitfield	310.12	5575

Development Proposed in Flood Zone 1 with a High Chance of Surface Water Flooding

26. Of the 103 sites considered in the Level 2 SFRA, 6 have been identified as being in Flood Zone 1, but with a high chance of surface water flooding.

Table 2 : Sites Flood Zone 1 with a High Chance of Surface Water Flooding

Sites Flood Zone 1 with a High Chance of Surface Water Flooding				
Reference	Site Address	Settlement	Site area (ha)	Capacity
TC4S044	Halfacres, Short Lane, Alkham, CT15 7BZ	Alkham	0.17	3
DOV022C	Land in Coombe Valley, Dover	Dover	0.37	20
SAP2	Land to the south of Alkham Valley Road / land to the rear of The Meadows, AVR, Alkham, CT15 7EW	Alkham	0.86	10
GOO006	Land adjacent to Short Street, Chillenden	Goodnestone	1.02	5
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Lydden	2.18	30
EYT009	Land to the east of Terrace Road, Elvington	Eythorne and Elvington	10.34	150

27. The majority of sites proposed to be allocated in the Plan are in Flood Zone 1 and therefore pass stage 1 of the sequential test for Local Plan preparation. However, these sites do not fully meet the housing requirement set out in the Local Plan and therefore other sites in Flood Zones 2 and 3 have also had to be considered. This is due to two main reasons: the first being the fact that the Council have been unable to identify a

sufficient supply of suitable sites, through the HELAA process within Flood Zone 1, due to other planning considerations and constraints that have had to be weighed against flood risk; and second due to the highly constrained nature of the Districts three most sustainable settlements (Dover, Deal and Sandwich). As a result of this, sites located within, or partially within, Flood Zones 2 and 3 have been considered as part of the preparation of the Local Plan, where, on balance, they are less constrained on other planning considerations, are sustainably located and offer opportunities for the regeneration of brownfield land.

Development Proposed in Flood Zone 2

28. There has been 1 site identified as located within Flood Zone 2.

Table 3: Sites located in Flood Zone 2

Sites located in Flood Zone 2					
Reference	Site Address	Settlement	Site area (ha)	Capacity	% of site in Flood zone
WOR006	Land to the east of Jubilee Road	Worth	1.27	10	46.78

29. One site has been considered in Flood Zone 2 due to its sustainable location adjacent to the settlement of Worth. The site also has lower levels of impact on other planning matters than alternative sites in the settlement area. The site is classed as more vulnerable and therefore not subject to the exceptions test. No further sites that are just in Flood Zone 2 have been identified through the HELAA process, and therefore the Council has had to move to the next stage of the sequential test process and look at sites in Flood Zones 2,3 and 3b.

Development Proposed in Flood Zones 2, 3, and 3b

30. There have been 13 sites identified as been located or partially located within Flood Zones 3, 3 and 3b.

Table 4: Sites located in Flood Zones 2 and 3

Sites located in Flood Zones 2 and 3										
Reference	Site Address	Settlement	Site area (ha)	Capacity	Flood Zone 2	% of site in Flood zone 2	Flood Zone 3	% of site in Flood zone 3	Flood Zone 3b	% of site in Flood zone 3b
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	Sandwich	2.19	40	Y	0.45	Y	2.03	N	
NOR005	Betteshanger Colliery, Betteshanger, Deal	Deal	20.69	210	Y	0.23	Y	4.88	N	
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Sandwich	1.58	35	Y	11.68	Y	10.51	N	
ELR1	Ramsgate Road, Sandwich	Sandwich	81.6	TBD	Y	7.05	Y	34.93	Y	8.19
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	3.30	40	Y	9.97	Y	42.18	N	
ELR2	Discovery Park Enterprise Zone, Sandwich	Sandwich	77.04	TBD	Y	13.69	Y	79.13	Y	1.88
SAN006	Sandwich Highway Depot, Ash Road, Sandwich	Sandwich	2.09	32	Y	0.48	Y	96.16	N	

SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	Sandwich	0.70	35	Y	27.26	Y	69.85	N	
DOV028	Charlton Shopping Centre, High Street, Dover	Dover	0.63	100	Y	7.39	Y	0.28	Y	0.23
DOV018	Mid Town	Dover	5.99	100	Y	16.85	Y	43.00	Y	8.32
DOV023	Buckland Mill, Dover	Dover	2.38	124	Y	58.86	Y	7.46	Y	5.83
DOV017	Dover Waterfront	Dover	12.27	263	Y	4.09	Y	64.24	Y	50.33
	Bench Street	Dover	0.99	TBD	Y	5	Y	5	N	

31. These sites have been considered as part of the plan making process for a number of reasons:

- The site is sustainably located either within, or in close proximity to the District's main settlements of Dover Town and Sandwich and is in accordance with the growth strategy set out in the Local Plan;
- The site is previously developed;
- The site is an existing land allocation - Dover Waterfront, Bench Street and Mid Town Dover;
- The site has existing planning consent for either housing, employment or mixed use development - Discovery Park, Sandwich, Buckland Mill Dover and Betteshanger Colliery, Deal;
- The site offers significant regeneration opportunity;
- The site is relatively unconstrained in other terms and would have low levels of impact in relation to other planning matters; and
- The limited availability of other sites, which are not significantly constrained, in these locations.

32. Of the sites considered in Flood Zones 2, 3 and 3b the following will need to be subject to the exceptions test: NOR005, SAN007, ELR1, SAN004, ELR2, SAN006, SAN008, DOV028, DOV018, DOV023, DOV017 and Bench Street Dover.

33. No further sites that are in Flood Zones 2 and 3 have been identified through the HELAA process, and therefore the Council has had to move to the next stage of the sequential test process and look at sites in Flood Zone 3.

Development Proposed in Flood Zone 3

34. There have been 3 sites identified as been located or partially located within Flood Zone 3.

Table 5: Sites located in Flood Zone 3

Sites located in Flood Zone 3						
Reference	Site Address	Settlement	Site area (ha)	Capacity	Flood Zone 3	Flood zone 3 %
TC4S032	Ethelbert Road garages	Deal	0.09	5	Y	100.00
TC4S047	104 Northwall Road, Deal	Deal	0.28	8	Y	100.00
ELR3	Sandwich Industrial Estate	Sandwich	22.9	TBD	Y	100.00

35. The three sites located within Flood Zone 3 have been considered due to their sustainable location within, or partially within the settlements of Deal and Sandwich and their low levels of impact on other planning matters. Further, Ethelbert Road and Sandwich Industrial Estate are both brownfield sites and 104 North Wall Road is partially brownfield, and the redevelopment of these sites provides the potential for regeneration in those locations.

36. Of the sites considered in Flood Zone 3 the following will need to be subject to the exceptions test: TC4S032 and TC4S047.

Application of the Exception Test

37. The NPPG provides detail on the type of development, by flood zone, the exception test should be applied to⁷. The exception test should demonstrate that the proposed development of a site would provide wider sustainability benefits to the community that outweigh the flood risk; and will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.
38. The SFRA 2 has identified 14 sites within Flood Zones 2 and 3 and 2 sites in Flood Zone 3 that should be subject to the Exception Test. It is considered that the 14 sites subjected to the exception test are the most suitable and available sites that provide sustainability benefits to the community that outweigh the flood risk. The table below sets out the SFRA2 recommendations for each site, how they have been adapted to Policy in the Local Plan and the concluding benefits that allocating each site brings.

Table 6: Recommendations for each site

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
NOR005 Betteshanger Colliery, Betteshanger, Deal	Housing More vulnerable FZ 2 & 3	This site now has planning permission and therefore will not be allocated in the Local Plan. The exception test is therefore not required.	N/A	N/A
SAN007 Land known as Poplar Meadow, Adjacent to 10	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is in a	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required.	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
Dover Road, Sandwich		<p>sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. Many of the available alternative sites in the Sandwich area are also in flood zones and on balance, taking into account other planning considerations, are less suitable for development.</p>	<p>Suds should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance. All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resistance and resilience measures should be included for inclusion.</p> <p>Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 16m of a tidal waterbody or</p>	<p>be carried out in accordance with Policy CC5.</p> <p>SuDs should be provided in accordance with Local Plan Policy CC6.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
			tidal defence infrastructure to obtain consent via a Flood Risk Activity Permit. When developing a scheme, the condition of any adjacent defences should be taken into account and consideration given to upgrading the defences to maintain, or further, the protection offered to the site and surrounding area. The cost associated with defences upgrades should be shared amongst the beneficiaries.	
ELR1 Ramsgate Road, Sandwich	Employment Less Vulnerable FZ 2 & 3b	Site is not proposed to be allocated in the Local Plan. The exception test is therefore not required	N/A	N/A
SAN004 Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, being partially within the Sandwich settlement confine and adjacent to existing residential and commercial uses. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
		through the policies in the Local Plan. The site is less constrained than the alternative available sites and offers the opportunity for regeneration.	Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. When developing a scheme, the condition of any adjacent defences should be taken into account and consideration given to upgrading the defences to maintain, or further, the protection offered to the site and surrounding area. The cost associated with defence upgrades should be shared amongst the beneficiaries.	
ELR2 Discovery Park Enterprise Zone, Sandwich	Commercial Less vulnerable FZ 2 & 3b	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. Existing brownfield site with viable employment uses. Site benefits from existing planning permission for mixed use development including employment, commercial and housing. The site is proposed for intensification to meet the Districts need for employment land. The site is less constrained than other available sites for employment use and has greater potential for intensification than the alternative sites.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – During all three modelled scenarios there are only localized areas of surface water accumulation shown within the highways and against the existing buildings. This could be attributed to topographic depressions. A detailed FRA is required. Suds should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance. All major development will require a Surface Water Management Strategy to be produced to	Site isn't allocated in the Local Plan as already has planning permission. Any future applications to be determined against Local Plan Policy CC5 - Flood Risk and CC6 - SuDs.

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
		<p>The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan.</p>	<p>show how the SuDs will be included to manage surface water runoff from the site.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resistance and resilience measures should be included for inclusion.</p> <p>The EA should be consulted where development is proposed within 16m of a tidal waterbody or tidal defence infrastructure to obtain consent via a Flood Risk Activity Permit.</p>	
SAN006 Sandwich Highway Depot, Ash Road, Sandwich	Housing More vulnerable FZ 2 & 3	<p>The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport.</p> <p>The site is previously developed and in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuDs should be provided in accordance with Local Plan Policy CC6.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
		<p>compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan.</p> <p>The site is less constrained than the alternative available sites and the site offers the opportunity for regeneration.</p>	<p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable.</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p>	
<p>SAN008 Woods' Yard, rear of 17 Woodnesborough Road, Sandwich</p>	<p>Housing More vulnerable FZ 2 & 3</p>	<p>The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
		negative effects through the policies in the Local Plan. Many of the available alternative sites in the Sandwich area are in flood zones and are less suitable for development. The site offers the opportunity for regeneration.	Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resilience and resistance measures should be considered for inclusions	
DOV028 Charlton Shopping Centre, High Street, Dover	Housing More vulnerable FZ 2 & 3	The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is previously developed, sustainable located within the urban area and has the opportunity to provide regeneration to the centre of Dover Town. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that it is less constrained and more sustainably located than alternatives sites not proposed in the Local Plan.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required including a comprehensive investigation into surface water flood risk. All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
			<p>increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	
DOV018 Mid Town, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects.</p> <p>Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires detailed flood modelling to be undertaken and a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
			The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)	
DOV023 Buckland Mill, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects.</p> <p>Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
			obtain consent via a Flood Risk Activity Permit (FRAP)	
DOV017 Dover Waterfront	Housing More vulnerable FZ 2 & 3	The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield and undergoing site wide regeneration that in later stages will include homes. The site is providing regeneration to Dover Town. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
Bench Street Dover	Mixed Use More Vulnerable	<p>The site is in Dover Town, which is the District’s main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>Development to be located in the lowest areas of flood risk on the site. Internal layout of buildings particularly where floor levels cannot be raised should be located in areas at lowest risk of flooding. A Surface Water Management Strategy to be produced to show how SuDS will be included to manage surface water runoff from the site</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
TC4S032 Ethelbert Road garages	Housing More vulnerable FZ3	<p>The site is in Deal, which is one of the District’s three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location being located within Deal urban area. The site generally scored positively</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
		<p>in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained, more sustainable located than the alternatives sites not proposed in the Local Plan and offers the opportunity for regeneration.</p>	<p>development and any upgrades are carried out where necessary.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable.</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p>	<p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>
<p>TC4S047 104 Northwall Road, Deal</p>	<p>Housing More vulnerable FZ3</p>	<p>The site is in Deal, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is partially previously developed and in a sustainable location being located in part within Deal urban area. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required.</p> <p>SuD's should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance.</p> <p>All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
		<p>scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised. Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable. Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. The EA should be consulted where development is proposed within 8m of a main river to obtain consent via a Flood Risk Activity Permit (FRAP) The LPA should be consulted prior to the commencement of any works to obtain consent for any development proposed within 8m of any ordinary watercourse. Where the watercourse falls within the RSIDB area, the RSIDB should be consulted to obtain consent.</p>	

Conclusion

39. Managing flood risk has been a key consideration in the Plan making process. There were 103 sites considered in the Level 2 SFRA, of which 14 sites were required to be assessed through the exception test. Sites located within flood zones have been assessed through the SFRA 2, sequential and exception tests with the sites then provided with actions and recommendations for flood mitigation. Those actions and recommendations have been considered in the preparation the of the Local Plan and embedded within the climate change and site allocation policies. The 14 sites subject to the exception test were found to be the most suitable of those made available through the HELAA in the Districts settlement areas and are considered to provide sustainability benefits to the community that outweigh the flood risk.