

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council

Local Plan Examination Note for Inspector in response to Action Point 28 regarding the STR/SS1 Land at Paddock Wood and east Capel Sequential Test

Document Reference: TWLP/151

Date: September 2024



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1.0 Introduction

- 1.1 At the Tunbridge Wells Borough Council Local Plan Stage 3 Hearings on Tuesday 16 July 2024 Matter 4 Issue 1 'Flooding and Flood Risk', discussion was had regarding the application of the sequential test, and how this had been undertaken by the Council. Document [TWLP/134](#) sets out the response to the respective MIQs relating to Flooding and Flood Risk.
- 1.2 The purpose of this technical note is to provide further explanation and evidence of the application of the Flood Risk policy and the Sequential Test, particularly insofar as it relates to site allocation STR/SS1 land at Paddock Wood and east Capel.
- 1.3 The Council in its response [[TWLP/134](#)] has submitted a wide variety of evidence to support the Submission Local Plan, both at submission stage and as part of the ongoing Examination in Public. Where they relate to flood risk and site selection, they are set out in **Appendix 1** of this Note.
- 1.4 The Council has applied a sequential based approach to the identification of housing land within the Submission Local Plan including land at Paddock Wood and at east Capel, as in its response to the Inspectors initial Findings further modelling has been undertaken by consultants JBA (see Appendix 1).

2.0 National guidance on flood risk and the application of the Sequential Test

- 2.1 The [NPPF](#) states that ‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere’ paragraph 159. And that ‘Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources’ Paragraph 160.
- 2.2 At paragraph 161 the NPPF states ‘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’.
- 2.3 Paragraph 162 of the NPPF sets out that: 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.
- 2.4 Paragraph 163 then sets out that: 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 of the NPPF (See **Appendix 4**).
- 2.5 Guidance relating to the application of the Sequential Test is shown in the form of flow charts in National Planning Practice Guidance ([PPG](#)). It is noted that the PPG was updated in August 2022 (after the Stage 2 hearing sessions). The updated PPG was taken into account by the Council in its response to the Inspector’s initial findings letter [\[ID-012\]](#). The PPG states that where flood risk is a consideration for a plan or development proposal the process should be to follow set steps: Avoid, Control, Mitigate, and Manage residual risk.
- 2.6 Diagram 1 sets out how Flood Risk should be taken into account in the preparation of strategic policies such as those in Development Plan Documents, and as such, including the Tunbridge Wells Borough Council Local Plan.
- 2.7 Diagram 2 sets out how the sequential approach can be applied when it is required.

2.8 Finally Diagram 3 shows how, when required the Exception Test can be applied to plan preparation.

2.9 The tables are produced in full below.

Diagram 1: Taking flood risk into account in the preparation of strategic policies

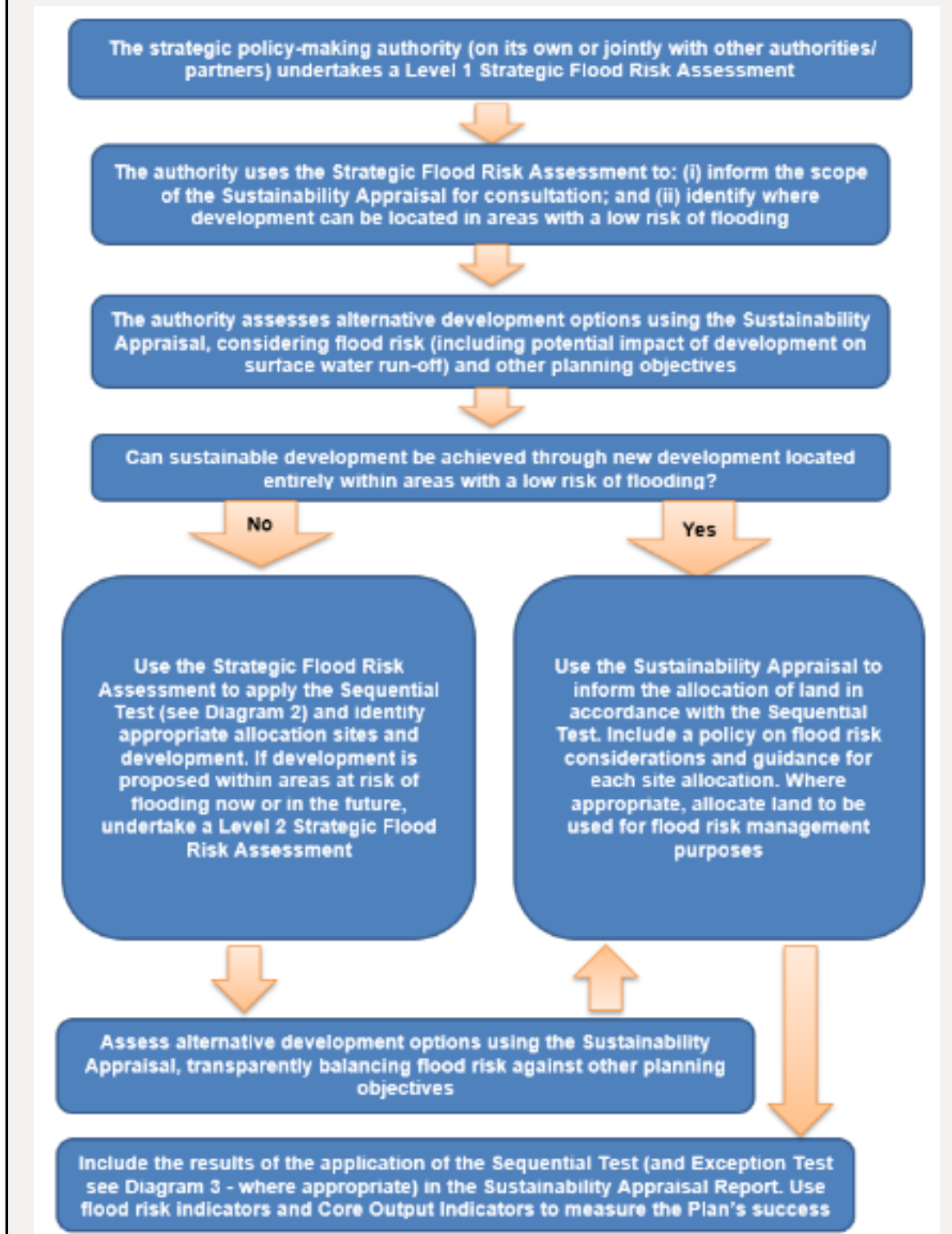


Diagram 2: Application of the Sequential Test for plan preparation

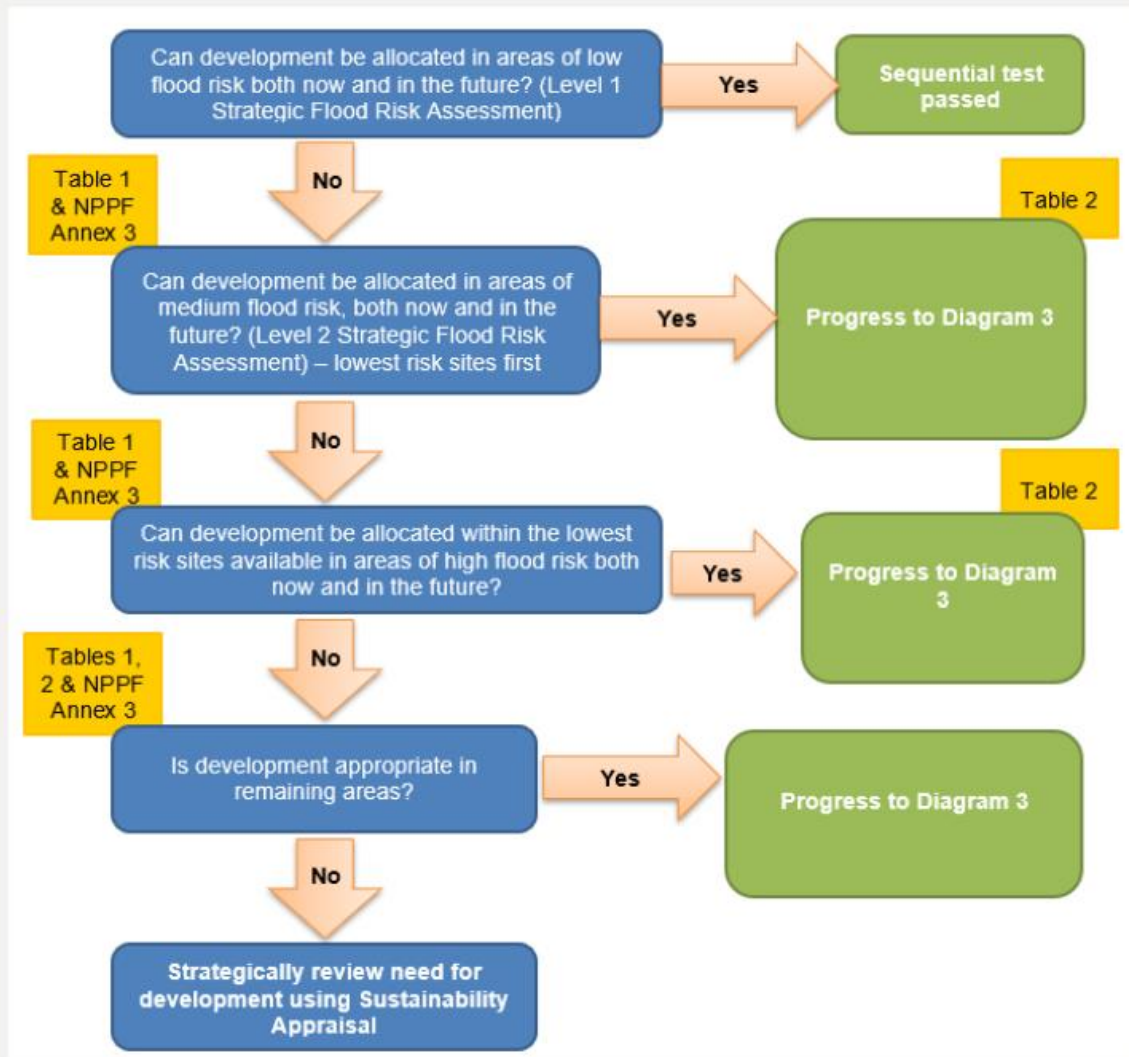
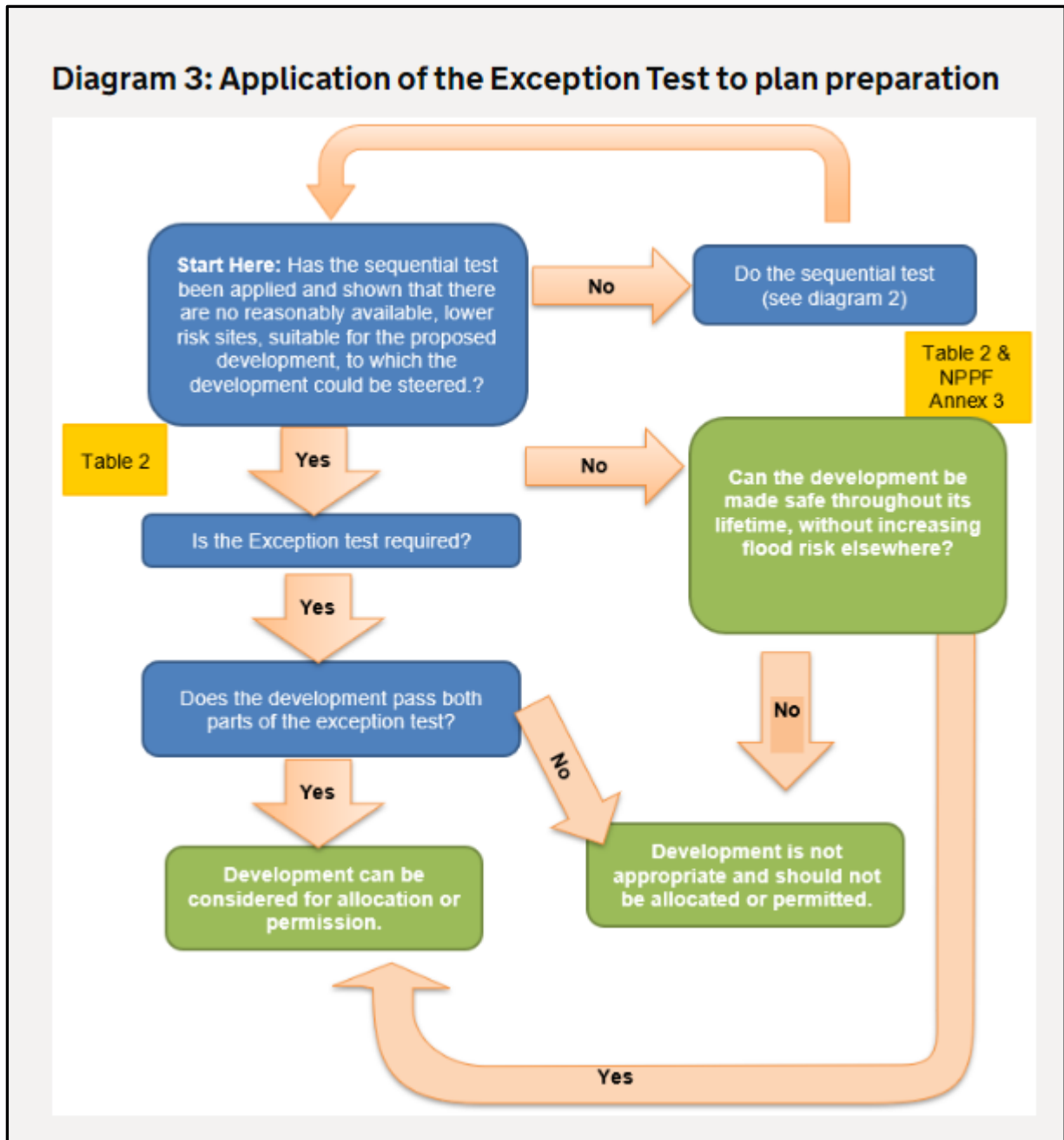


Diagram 3: Application of the Exception Test to plan preparation



2.10 The National Planning Policy Framework ([NPPF](#)) must be taken into account by local planning authorities when preparing Local Plans and for applicants preparing planning applications. Transitional arrangements for local plan examinations mean that for the purposes of the examination of the Tunbridge Wells Borough Local Plan, the relevant version of the NPPF was published in 2021.

3.0 TWBC Approach to Flood Risk

Sustainability Appraisal process

- 3.1 The council's Sustainability Appraisal (SA) Scoping Report from 2016 [[CD 3.5](#)] articulates that the SA process is imbedded into the Local Plan production and that there are five key stages in the preparation of a Sustainability Appraisal that are carried out alongside the preparation of a Local Plan:

Stage A – setting the context and objectives, establishing the baseline, deciding on the scope;

Stage B - Developing and refining options and assessing effects;

Stage C - Preparing the publication version of the Sustainability Appraisal Report;

Stage D - Consultation with statutory bodies and the public;

Stage E - Post adoption reporting and monitoring.

- 3.2 The council has followed all of these stages throughout the preparation of the Local Plan. In the SA Scoping Report, the sustainability objectives for the Tunbridge Wells Borough Local Plan are set out. SA Topic 19 is Water - with the objective being to 'Manage flood risk and conserve, protect and enhance water resources'.
- 3.3 Conflicts between the SA Objective No. 19 are identified for housing as 'Meeting housing needs will increase water consumption and could exacerbate flood risk and threaten water quality', and for business growth as 'Supporting business growth will increase water consumption and could exacerbate flood risk and threaten water quality' [[CD 3.5 Table 7](#)].
- 3.4 The SA Scoping Report also identifies respective International Plans, Policies and Programmes which the preparation of the local plan must have regard to [Table 8]. These include:
- Floods Directive (2007)
 - Flood and Water Management Act (2010)
 - Making Space for Water (DEFRA) (2005)
 - Kent County Council Local Flood Risk Management Strategy (2013)
 - Paddock Wood Surface Water Management Plan (Stage 1 and 2) (2015 Stage 2)
 - Strategic Flood Risk Assessment (SFRA) (updated as part of the Councils response to the Initial Findings)
 - Tunbridge Wells Surface Water Management Plan (2013)

- 3.5 Appendix A of the SA Scoping Report also sets out the Environmental Indicators Analysis as a baseline set of indicators for the Local Plan and includes data on properties which are at risk of flooding from rivers specifically the rivers in the catchments of the Rivers Medway, Teise, Beult and Rother. There are also areas at risk from flooding relating to stormwater and groundwater. The implication being that the Local Plan must ensure existing properties are not put at increased risk of flooding and that risk is minimised when plan-making, including through the proposed development strategy.
- 3.6 The SA Scoping Report concludes with the final Sustainability Objectives for the Tunbridge Wells Borough Local Plan, which for topic 19 Water is to 'Manage flood risk and conserve, protect and enhance water resources'. It sets the objectives as –
- Reduce water consumption rates;
 - Manage impacts from flooding;
 - Not exacerbate flood risk on or off site;
 - Support improvements in groundwater quality;
 - Relieve pressures on ecology of water bodies from agriculture, water industry and rural land management activities.
- 3.7 Various statutory bodies have been included in the scoping exercise for the SA including Kent County Council as Lead Local Flood Authority. Thus, it is clear from the outset that the Council has been conscious of the need to apply a risk-based approach with regards to flooding and flood risk in the preparation of its Sustainability Appraisal, and the earliest stages of plan-making.
- 3.8 The final SA used the detailed flood mapping of the whole borough and individual sites (which included all sources of flood risk), as produced within the Strategic Flood Risk Assessment (SFRA) through its assessment of options for growth and consideration of alternative options.
- 3.9 The SA considered the findings of the SFRA as part of the environmental baseline review, and the scoring methodology importantly considered flood risk as part of the decision aiding process. Additionally, all sites were scored by consideration of, amongst other issues, how well impacts from flooding were managed and whether flood risk could be exacerbated on or off site.

Strategic Flood Risk Assessment

- 3.10 The Council undertook a SFRA 2019 [\[CD 3.105\]](#) which incorporated at Level 1 SFRA and Level 2 SFRA and which updated the SFRA originally published by Tunbridge Wells Borough Council in November 2007. The main purpose of the SFRA is to provide the appropriate supporting evidence for the emerging Local Plan in terms of development and flood risk at the borough level. The SFRA (2019) has been prepared

in two parts – a Level 1 SFRA for the whole borough and a Level 2 SFRA focusing on the land around Paddock Wood including land in east Capel.

- 3.11 The purpose of the SFRA is to take into account latest flood risk policy and the latest flood risk data, to provide individual flood risk analysis for sites identified by the Council at the borough level as part of the Local Plan preparation, and to provide a comprehensive set of maps to support this work [[CD 3.105b](#)].
- 3.12 The SFRA goes into detail about the application of the sequential test, stating that ‘the Local Planning Authority should demonstrate that it has considered a range of site allocations, using an SFRA to apply the Sequential and Exception Tests where necessary’. (para 3.2). The SFRA sets out that at the time of submission of the Local Plan (November 2021) it had not been possible to locate all development within Flood Zone 1, referring to a further assessment of ‘actual risk’ that was undertaken as part of the SFRA process.
- 3.13 The Submission Local Plan sought for the meeting of the housing need of the borough across the plan period and in so doing allocated housing at Paddock Wood and land at east Capel (Policy STR/SS1) for 3,490-3,590 houses. During the preparation of the Submission Local Plan growth identified at the west of the settlement, in the eastern part of the parish of Capel contained areas which are in Flood Zones 2 and 3 and affected by surface water flood risk. The Council had concluded during the preparation of the Submission Local Plan that it could not meet its development needs entirely from sites that were in Flood Zone 1 due to both wider borough wide sustainability issues (primarily in relation to Green Belt, AONB and highways constraints) and the particular sustainable development considerations of Paddock Wood as a settlement. Hence the Council sought to deliver housing at Paddock Wood relying on the Exception test work that had been undertaken.
- 3.14 In response to the Initial Findings [[ID 012](#)] the Council has undertaken further work to assess specific Flood Risk concerns raised by the Inspector. These documents are in the Core Document Library and have previously been consulted on:-
- River Medway and River Teise updated climate change Flood Zone modelling and mapping [[PS 042](#)]
 - Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping [[PS 043](#)]
 - Updated present day and climate change Flood Zone mapping [[PS 044](#)]
 - Employment Land Provision at Paddock Wood [[PS 045](#)]
- 3.15 The Councils response has been set out in the Development Strategy Topic Paper Addendum[[PS 054](#)] insofar as it relates to Flood Risk and the strategic development at Paddock Wood and land at east Capel (STR/SS1), based on the aforementioned additional flood modelling work and, for the avoidance of doubt has resulted in a change

to the Development Strategy for Paddock Wood and land at east Capel, by reducing the level of growth associated with the settlement to approximately 2,500 dwellings, located wholly within Flood Zone 1.

- 3.16 The original SFRA sets out (table 13) an assessment of development sites which includes the level in which that site would be within Flood Zones 1, 2 or 3. The SFRA has been used to determine which sites across the entire Submission Local Plan (SLP) meet the flood risk strategy in diagram 2 above. The tables of sites has been reproduced at **Appendix 2** of this document for ease of use, which reflects just those sites that have been included in the SLP, with the only amendment being the parcels at STR/SS1 Paddock Wood and land at east Capel which have been amended as a result of the most recent flood risk modelling work undertaken by the council in response to the Inspectors Initial Findings [[ID_012](#)].
- 3.17 The Table indicates that the Councils approach to flood risk has been in accordance with 'Avoid, Control, Mitigate, Manage residual risk' approach to plan-making.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 3.18 The Strategic Housing and Economic Land Availability Assessment (SHELAA) Main Report [[CD 3.77a](#)] explains (at Section 3) the methodology used to determine whether sites could be considered suitable as potential site allocations in the Local Plan. The methodology identifies that there has been two main call for sites undertaken and the selection of these sites by means of the SHELAA, identified sites appropriate for development in that they are considered available, suitable and developable as per the SHELAA planning guidance and thus deliverable as set out in Annex 2 of the NPPF.
- 3.19 The SHELAA sets out that 'To be suitable for allocation, as well as meeting planning policy requirements, in line with the NPPF, a site also needs to be 'deliverable' and 'developable'. These tests have been applied when assessing the suitability of a site for allocation in the new Local Plan.' (para 3.35) and that 'Work was carried out to establish the developable area of each site; that is, the amount of land excluding planning constraints that comprise Ancient Woodland, SSSIs and Flood Zone 3 that would preclude most forms of built development (these are termed 'level 1' constraints).' (para 3.37) Appendix 3 of the SHELAA identifies the 'list of constraints screened' which include Level 1 constraints – Ancient Woodland, SSSIs, Flood Zone 3b; and Flood Zones 2 and 3.
- 3.20 Following this evidence based approach, it is identified that a key issue in formulating the growth strategy has been to ensure that the growth strategy can be accommodated without further harm and risk to areas that are vulnerable to flooding. The need to avoid development in areas of higher flood risk is also recognised in the Development Strategy Topic Paper [[CD 3.126](#)] at para 3.16. Of particular note is para 6.219 where it is explained that the Council has worked collaboratively with its flood risk consultants, the Environment Agency, and Kent County Council (as lead Flood Risk Authority) in

developing the spatial distribution of sites informing site assessment work, and formulating the development strategy.

- 3.21 The SHELAA methodology details the process undertaken in the consideration of sites, in particular 'Level 1 constraints', such as flooding identified in the SFRA. Individual site assessment sheets in the SHELAA have listed where there is flood risk on a site, including 'Level 1 constraints' as above (Flood Zones 3b), and in addition Flood Zones 2 and 3 which have been considered as part of the site assessment process. Additionally, sites identified as being at risk of flooding were given further consideration and consulted on with the Environment Agency and Kent County Council where appropriate.
- 3.22 As part of the detailed SHELAA process the Council considered the sites that had been submitted through the various Call for Sites that were undertaken at the earlier stages of plan preparation. The Call for Sites was undertaken in a proactive manner (meaning officers called around site promoters, and held Parish/Town/Neighbourhood workshops, and accepted the submission of sites for assessment beyond the Call for Sites) to identify as many available sites as possible that might be suitable for development.
- 3.23 In total, some 518 sites were considered in the updated SHELAA, which informed the Pre-Submission Local Plan and included site visits to all sites.

How the SFRA informed policy and site allocation

- 3.24 The Council has, in the preparation of the Local Plan, considered flooding constraints (from all forms of flooding) to determine the spatial distribution of development in accordance with the requirements of the NPPF. In line with Paragraph 161 of the NPPF, it is acknowledged by the Council that the Local Plan should apply a sequential, risk-based approach to the location of development and the first step in doing so is to apply the 'sequential test' and, if necessary, the 'exception test'.
- 3.25 The SFRA informed policy insofar as it related to allocation of land in the Submission Local Plan through the 'Avoid, Control, Mitigate, Manage residual risk' approach. In the vast majority of instances other than this site allocated at Paddock Wood and land at east Capel, and a small number of sites at Royal Tunbridge Wells, sites were allocated in Flood Zone 1.
- 3.26 The exception to the approach was for STR/SS1 where certain parts of the allocation within the Submission Local Plan were within Flood Zone 2.

The response to the Initial Findings

- 3.27 Following receipt of the Initial Findings [[ID_012](#)] the Council's Flood and Drainage consultant (JBA) undertook further modelling in order to assess the Planning Practice Guidance updates (August 2022) which introduced a requirement to consider climate change impacts as part of the Sequential Test. This further modelling was carried out for the Paddock Wood streams and River Medway/River Teise with a third assessment

combining the predictions for both models to understand the combined flood modelling impacts ([PS 042](#), [PS 043](#), and [PS 044](#)).

- 3.28 This updated flood modelling also incorporates +37%, reflecting a precautionary estimate of climate change applicable to the catchment from fluvial flooding as accords to the latest guidance. A +27% model for climate change was also prepared by the Council's consultants (JBA), although this did not offer greatly different results in most areas subject to housing development. There were however, some greater differences elsewhere across Paddock Wood and so in order to robustly outline the extent of development which could be delivered through the Strategic Sites, the +37% was considered to be a more appropriate and robust approach overall. The conclusion was to take a precautionary approach to development given the increased areas of flood risk identified in Paddock Wood and land at east Capel and to only allocate land within Flood Zone 1 for residential development.
- 3.29 The updated flood assessments carried out have formed the basis of the updated Masterplanning work carried out and have fundamentally influenced the strategy for the Strategic Sites in response to the Initial Findings. This additional masterplanning work was undertaken by David Lock Associates ([PS 046](#)) which sets out that the updated modelling by JBA reducing the flood risk boundaries and has been included in an updated baseline for the masterplanning to provide additional robustness.
- 3.30 The change in flood risk boundaries reduced the development capacity of the sites to the west of Paddock Wood directly in Flood Zone 1 and thus the amount of housing included in the revised policy. To account for this, the assumed average density will be dropped by 15%, from 35dph (as previously set out) to 30dph. However, it is recognised that the width of some development parcels represents the opportunity for higher densities depending upon the development mix and structure of these spaces designed by the developers. With this in mind, 32dph is reasonable in these areas and a total figure of up to 2,532 dwellings for the combined Strategic Sites is envisaged.
- 3.31 The Council considers that the above approach to housing delivery at Paddock Wood and land at east Capel results in the passing of the Sequential Test. Now that all of the land available for housing is within Flood Zone 1, it is not necessary for the exception test to be applied.
- 3.32 In regard to employment land at Paddock Wood and land at east Capel (STR/SS 1) in identifying available and suitable sites for employment use, landowners and developers were invited to put forward sites for consideration as part of the Strategic Housing and Employment Land Assessment (SHELAA). All sites available for employment put through the Call for Sites at Paddock Wood have been included in the SLP.
- 3.33 In light of the Inspectors Initial Findings and consequential impact from a reduction in housing allocated at PWeC, a review of the amount of employment necessary to support the reduced level of housing growth at Paddock Wood and across the Local

Plan generally has been considered particularly in light of the Inspectors comments regarding flood risk in the Initial Findings.

- 3.34 An assessment of the impact on employment allocation delivery has been undertaken in the 'Employment land provision at Paddock Wood' document ([PS 045](#)). This identifies that the level of employment floorspace at Paddock Wood and land at east Capel would be lower than in the SLP. Now 8 hectares of land would be required in order to support the strategic delivery of housing at Paddock Wood and land at east Capel, reduced from 11.2 hectares.
- 3.35 A review of the employment allocations was undertaken having regard to the revised JBA modelling work that was undertaken. Certain allocated sites were identified as being in higher Flood Zones than at the SLP stage. Whilst the PPG sets out that general industry, and storage and distribution represent 'less vulnerable uses' (**Appendix 5**), which can be accommodated in Flood Zones 1, 2, and 3a without the need for an exception test being passed, nevertheless it is noted that the NPPF sets out that sequentially preferable sites should be used if available.
- 3.36 While the sites in the SLP represent all of those put forward specifically for employment development as part of the Local Plan, it follows from the flood risk modelling that potential land within Flood Zone 1 (FZ1) should therefore be re-considered. In essence, this means looking at land that is currently being promoted for residential use in the revised proposals for Paddock Wood including land in east Capel.
- 3.37 Land to the east of the town is discounted because of poor road access, whereas land close to the A228 on the western side of the town could provide ready access to the main road network. This implies land either close to the junction of the A228 junction with Badsell Road on the south-west edge of the town or close to the new junction to the A228 that is proposed to serve new housing to the north-west of the town.
- 3.38 An area of some 5 hectares of land was identified within one of the residential parcels at Paddock Wood and land at east Capel (Paragraph 6.32 of [PS 045](#)), however no other land outside the strategic site area has been identified as potentially suitable for employment purposes.
- 3.39 As part of the review of the development strategy it was identified that the additional employment land (within the NW parcel) would not be suitable for employment uses as it was not reasonably available and was not appropriate for the proposed development. The land considered was in the control of a housebuilder which is promoting the site for residential purposes. Also, and critically, while the site could potentially accommodate Class E (office and light manufacturing) which is, by definition, not expected to be detrimental to the amenities of proposed adjacent housing, it would be far less suitable for large-format warehouse units (B8 use) which is needed as part of the allocation, by virtue of their massing, high proportion of HGV traffic movements and preferred hours of operation. Other land within the allocation would be more remote and further away from existing employment land. Furthermore, any further reduction in the amount of land

available in this parcel of Flood Zone 1 land, would reduce the amount of land available for housing within the Local Plan.

- 3.40 Therefore, it is concluded that the combination of uncertain availability and its unsuitability for the anticipated purposes, makes this site inappropriate.
- 3.41 There were no other suitable employment sites within Flood Zone 1 identified within the vicinity of Paddock Wood where the housing growth was being proposed, and which would serve to enable sustainable development by its proximity to that growth.
- 3.42 The next most suitable sites were those in Flood Zone 2, to the east of Transfesa Road. These are, or will be, in a medium risk category. Together, they would provide developable areas of some 4.2 hectares. The combination of the approved Swatlands Farm site and the southern/western section and the north-eastern sections (reflecting the two ownerships) to the East of Transfesa Way would provide some 8.5 hectares of net developable employment land, which would meet the baseline target of some 8 hectares.
- 3.43 The Council notes that when formulating its response to the Inspector's initial findings, it did give consideration to whether there were other suitable sites that could be allocated, and as has been discussed elsewhere in the Stage 3 hearing statements, consideration was given to whether there were reasonable alternative Green Belt sites suitable for development as a consequence of the findings of the additional Stage 3 Green Belt assessment of reasonable alternative sites, and subsequent consideration of these through the SHELAA process. The Council found and concluded that there are no more deliverable sites available for allocation at this time.

4.0 Summary and Conclusions

- 4.1 The NPPF sets out the approach to flood risk in that inappropriate development in areas of flood risk should be avoided.
- 4.2 The SLP is comprehensive and sets out in many ways how flood risk is taken into account. Particularly identifying flood risk as a key designation affecting some of the settlements in the borough with Paddock Wood being the example given of a settlement affected by flood risk. It is also noted that Flood Risk is one of the constraints identified by Sustainability Appraisal and SHELAA which were some of the earliest evidence base documents produced. The Development Constraints Study, 2016 [[CD 3.32](#)] - states at para. 2.19 Housing is defined as a 'More Vulnerable' use in the Planning Practice Guidance and this is stated to be an 'appropriate use' in Flood Zones 1 and 2 The Council has therefore been aware of Flood Risk and has taken it into account since the very early stages of plan-making. The Development Strategy acknowledges the importance of climate change, which is recognised at para 4.109 of the Submission Local Plan [[CD 3.128](#)], whilst directing development to land within settlements not in Flood Zone 2 or 3.
- 4.3 The council has followed the government's policy and guidance in how it has prepared its local plan throughout, by imbedding these principles into the evidence base from an early stage.
- 4.4 The Council has in the whole applied the avoidance technique for allocating land use within the SLP. Land at Paddock Wood and land at east Capel within the SLP (STR/SS1) was within FZ2, however, following on from receipt of the Initial Findings, the councils response has been to remove all inappropriate development from FZ2. Furthermore in regards to employment land the council has applied the sequential test as required.
- 4.5 The Council will also apply a sequential test to new development at the planning application stage, supported by the [Flood Risk Assessment: The Sequential Test for Applicants Planning Practice Guidance](#) (or subsequent revision), to direct development away from areas that are at the highest risk of flooding. These will include all proposed areas that are within Flood Zones 2 and 3, as well as sites in Flood Zone 1 that are larger than one hectare and/or have critical drainage problems, as identified by the Environment Agency and within the Council's latest Strategic Flood Risk Assessment, such as in parts of Paddock Wood and Five Oak Green/Capel. 'The Council will therefore discourage inappropriate development in areas at known risk from flooding and, as the Local Planning Authority, will take account of flooding risks in all matters relating to development management/control, including within the Local Plan and individual planning applications, in accordance with the NPPF' (paragraph 6.279 – 6.280).

- 4.6 Furthermore Policy EN25 (Flood Risk) of the Submission Local Plan sets out that 'The sequential test and exception tests established by the NPPF will be strictly adhered to across the borough. Where it is demonstrated that development is unable to take place in an area of lower flood risk, essential transport or utility infrastructure or other appropriate development may be allowed as per an exception test if the development is designed to be compatible with potential flood conditions, also taking into account wider sustainable development objectives...' With set criteria being applied.
- 4.7 Throughout the preparation of the Local Plan the application of sustainability appraisal has been at the centre of decision making ensuring that development proposals allocated would be safe for the lifetime of the development. The Councils response to the Initial findings is consistent with this approach.

Appendices

Appendix 1: Documents produced in Support of the Submission Local Plan and as part of the Examination in Public.

- i) Strategic Flood Risk Assessments Level 1 and 2 [[CD 3.44a](#)]
- ii) SFRA Map Appendices [[CD 3.44b](#)]
- iii) Strategic Flood risk Assessment Levels 1 and 2 [[CD 3.105a](#)]
- iv) Strategic Flood Risk Assessment (SFRA) Appendices [[CD 3.105b](#)]
- v) River Medway and River Teise updated climate change Flood Zone modelling and mapping [[PS 042](#)]
- vi) Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping [[PS 043](#)]
- vii) Updated present day and climate change Flood Zone mapping [[PS 044](#)]
- viii) Employment Land Provision at Paddock Wood [[PS 045](#)]
- ix) Sustainability Appraisal Scoping Report (October 2016) – Doc Ref [CD 3.5](#)
- x) Interim SA for Issues and Options May 2017 [[CD 3.7](#)]
- xi) SA for Draft Local Plan [[CD 3.11](#)]
- xii) SA for Submission Local Plan [[PS 013](#)]
- xiii) SA Addendum [[PS 037](#)]
- xiv) Development Constraints Study [[CD 3.98](#)]
- xv) SHELAA [[CD 3.77a](#)]

Appendix 2: Table of sites and flood zones

SFRA table of sites

Policy reference	Address	Site ref	Site area (ha)	Proportion of site within Flood Zone 3b	Proportion of site within Flood Zone 3a	Proportion of site within Flood Zone 2	Proportion of site within Flood Zone 1	Flood Zone 3b informed from Precautionary Flood Zone 3a	Proportion of site within future Flood Zone 3a (2080s Higher Central)	Proportion of site within future Flood Zone 3a (2080s Upper End)	Future Flood Zone 3a informed from current Flood Zone 2 (Yes/No)	Proportion of site within RoFSW 30-year extent	Proportion of site within RoFSW 100-year extent	Proportion of site within RoFSW 1,000-year extent	Proportion of site outside RoFSW extent	Most common AStGWF category in site	Site intersected by Risk of Flooding from Reservoirs extent (Yes/No)
BE 1	Land adjacent to New Pond Road (known as Uphill), Benenden	473 (LS16)	0.78	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
BE 2	Feoffee Cottages and land, Walkhurst Road, Benenden	277	1.46	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No
BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	497 (LS40)	4.91	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
BE 4	Land at Benenden Hospital (north of Goddards Green Road), East End	498 (LS41)	3.71	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	No Data	No
BM 1	Land between Brenchley Road, Coppers Lane and Maidstone Road	484 (LS27)	2.84	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
BM 2	Land at Maidstone Road	401	1.65	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	< 25%	No
CRS 2	Land South of Corn Hall, Crane Valley, Cranbrook	292	4.96	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
CRS 3	Turnden Farm, Hartley Road, Cranbrook	430	27.64	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No

Policy reference	Address	Site ref	Site area (ha)	Proportion of site within Flood Zone 3b	Proportion of site within Flood Zone 3a	Proportion of site within Flood Zone 2	Proportion of site within Flood Zone 1	Flood Zone 3b informed from Precautionary Flood Zone 3a	Proportion of site within future Flood Zone 3a (2080s Higher Central)	Proportion of site within future Flood Zone 3a (2080s Upper End)	Future Flood Zone 3a informed from current Flood Zone 2 (Yes/No)	Proportion of site within RoFSW 30-year extent	Proportion of site within RoFSW 100-year extent	Proportion of site within RoFSW 1,000-year extent	Proportion of site outside RoFSW extent	Most common AStGWF category in site	Site intersected by Risk of Flooding from Reservoirs extent (Yes/No)
CRS 4	Cranbrook School	130	16.07	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
CRS 6	Land south of The Street, Sissinghurst	159	0.55	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	< 25%	No
CRS 7	Land at the Corner of Frittenden Road and Common Road, Sissinghurst	68	1.61	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	< 25%	No
FR 1	Land at Cranbrook Road, Frittenden	485 (LS28)	1.53	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	< 25%	No
GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	124	1.07	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
GO 2	Land at Triggs Farm, Cranbrook Road	174	1.74	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	< 25%	No
HA 1	Land at the White House, Highgate Hill	361	0.61	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
HA 4	Land off Copthall Avenue and Highgate Hill	78 (part of site)	5.28	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
HA 4	Land off Copthall Avenue and Highgate Hill	419 (part of site)	1.3	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No
HA 5	Land to the north of Birchfield Grove	413	7.45	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No
HA 7	Hawkhurst Station Business Park	102	2.14	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
HO 1	Land adjacent to Furnace Lane and Gibbet Lane	31	1.82	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No

Policy reference	Address	Site ref	Site area (ha)	Proportion of site within Flood Zone 3b	Proportion of site within Flood Zone 3a	Proportion of site within Flood Zone 2	Proportion of site within Flood Zone 1	Flood Zone 3b informed from Precautionary Flood Zone 3a	Proportion of site within future Flood Zone 3a (2080s Higher Central)	Proportion of site within future Flood Zone 3a (2080s Upper End)	Future Flood Zone 3a informed from current Flood Zone 2 (Yes/No)	Proportion of site within RoFSW 30-year extent	Proportion of site within RoFSW 100-year extent	Proportion of site within RoFSW 1,000-year extent	Proportion of site outside RoFSW extent	Most common AStGWF category in site	Site intersected by Risk of Flooding from Reservoirs extent (Yes/No)
HO 2	Land south of Brenchley Road and west of Fromandez Drive	162	3.48	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
HO 3	Land to the east of Horsmonden	82 (part of site)	1.01	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No
HO 3	Land to the east of Horsmonden	108 (part of site)	1.85	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
HO 3	Land to the east of Horsmonden	297 (part of site)	13.79	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	< 25%	No
HO 3	Land to the east of Horsmonden	324 (part of site)	0.94	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
LA 1	Land to the west of Spray Hill	279	6.04	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
PE 1	Land rear of High Street and west of Chalket Lane (part of site – landscape buffer only)	44 (part of site)	0.52	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
PE 1	Land rear of High Street and west of Chalket Lane	67 (part of site)	1.08	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	No Data	No
PE 1	Land rear of High Street and west of Chalket Lane	369 (part of site)	3.72	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
PE 1	Land rear of High Street and west of Chalket Lane	462 (LS5) (part of site)	1.18	0%	0%	0%	0%	No	0%	0%	No	0%	0%	0%	100%	No Data	No
PE 2	Land at Hubbles Farm and south of Hastings Road	50	5.42	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
PE 2	Land at Hubbles Farm and south of Hastings Road	390	0.12	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No

Policy reference	Address	Site ref	Site area (ha)	Proportion of site within Flood Zone 3b	Proportion of site within Flood Zone 3a	Proportion of site within Flood Zone 2	Proportion of site within Flood Zone 1	Flood Zone 3b informed from Precautionary Flood Zone 3a	Proportion of site within future Flood Zone 3a (2080s Higher Central)	Proportion of site within future Flood Zone 3a (2080s Upper End)	Future Flood Zone 3a informed from current Flood Zone 2 (Yes/No)	Proportion of site within RoFSW 30-year extent	Proportion of site within RoFSW 100-year extent	Proportion of site within RoFSW 1,000-year extent	Proportion of site outside RoFSW extent	Most common AStGWF category in site	Site intersected by Risk of Flooding from Reservoirs extent (Yes/No)
PE 3	Land north of the A21, south and west of Hastings Road	189	4.78	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
PE 4	Land at Downingbury Farm, Maidstone Road	375	4.53	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
PE 6	Woodsgate Corner, Pembury	395	4.78	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No
PE 8	Owsnest, Tonbridge Road	470 (LS13)	4.64	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
RTW 8	TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	258	0.2	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	< 25%	No
RTW 10	Montacute Gardens	7	0.86	0% > 25%	0%	0% > 25%	75% > 100%	Yes	0% > 25%	0% > 25%	Yes	0% > 25%	75% > 100%	0% > 25%	0% > 25%	No Data	No
RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	198	1.08	0%	0%	0%	100%	No	0%	0%	No	0%	0% > 25%	0% > 25%	75% > 100%	No Data	No
RTW 13	Turners Pie Factory, Broadwater Lane	145	1.36	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No Data	No
RTW 14	Land at Wyevale Garden Centre, Eridge Road	24	7.91	0% > 25%	0%	0% > 25%	75% > 100%	Yes	0% > 25%	0% > 25%	No	0% > 25%	0% > 25%	25% > 50%	50% > 75%	< 25%	No
RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	137	15.74	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	< 25%	No
RTW 17	Land adjacent to Longfield Road	57	22.3	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
RTW 18	Land at the former North Farm landfill site, North Farm Lane	72	20.19	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No	0% > 25%	0% > 25%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No

Policy reference	Address	Site ref	Site area (ha)	Proportion of site within Flood Zone 3b	Proportion of site within Flood Zone 3a	Proportion of site within Flood Zone 2	Proportion of site within Flood Zone 1	Flood Zone 3b informed from Precautionary Flood Zone 3a	Proportion of site within future Flood Zone 3a (2080s Higher Central)	Proportion of site within future Flood Zone 3a (2080s Upper End)	Future Flood Zone 3a informed from current Flood Zone 2 (Yes/No)	Proportion of site within RoFSW 30-year extent	Proportion of site within RoFSW 100-year extent	Proportion of site within RoFSW 1,000-year extent	Proportion of site outside RoFSW extent	Most common AStGWF category in site	Site intersected by Risk of Flooding from Reservoirs extent (Yes/No)
	and land at North Farm Lane, North Farm Industrial Estate																
RTW 19	Land to the North of Hawkenbury Recreation Ground	53	7.07	0%	0%	0%	100%	No	0%	0%	No	0% > 25%	0% > 25%	0% > 25%	75% > 100%	< 25%	No
RTW 20	Land at Culverden Stadium, Culverden Down	235	3.6	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
RTW 21	Land at Colebrook Sports Field, Liptraps Lane	238	4.22	0% > 25%	0% > 25%	0% > 25%	75% > 100%	No	0% > 25%	0% > 25%	No	0% > 25%	0% > 25%	0% > 25%	50% > 75%	< 25%	No
RTW 22	Land at Bayham Sports Field West	236	1.94	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	No Data	No
SA 1	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst	149	2.13	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	< 25%	No
		(the allocation is only for the northern half of the site)															
SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	232	0.56	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0%	100%	No Data	No
SP 1	Land to the west of Langton Road and south of Ferbies	231	0.79	0%	0%	0%	100%	No	0%	0%	No	0%	0%	0% > 25%	75% > 100%	< 25%	No

Appendix 2: Continued

SHELAA sites not included in the SFRA

Policy Reference	Address	SHELAA reference	Flood zone as in SHELAA
CRS 1	Land at Brick Kiln Farm, Cranbrook	Local Plan Allocation AL/CRS 1; Part SALP AL/CR4	1
HA 2	Brook House, Cranbrook Road	457 (new Local Plan Allocation AL/HA2; part SALP AL/HA1)	1
HA 3	Former site of Springfield Nurseries	Local Plan Allocation AL/HA 3 (part SALP AL/HA 1) includes a very small part of Site 115	1
PE 5	Land at Sturgeons fronting Henwood Green Road	458 (Local Plan Allocation AL/PE 5)	1
PE 7	Cornford Court, Cornford Lane	460 (Local Plan Allocation AL/PE 7)	1
PW 1	Land at Mascalls Farm	SALP AL/PW4 (New Local Plan Allocation AL/PW 1), including late site 52	2 and 3
RTW 1	Former Cinema Site, Mount Pleasant Road	SALP AL/RTW2B (Local Plan Allocation AL/RTW 1)	1
RTW 2	Land at the Auction House, Linden Park Road	Local Plan Allocation AL/RTW 2, including part of site 260 and SALP AL/RTW24	1
RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	SALP AL/RTW22 (Local Plan Allocation AL/RTW 3)	1
RTW 4	Land at 36-46 St John's Road	Local Plan Allocation AL/RTW 4, including	1

Policy Reference	Address	SHELAA reference	Flood zone as in SHELAA
		most of SALP AL/RTW5	
RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	Local Plan Allocation AL/RTW 5, including site 100 and part of 30	1
RTW 6	Land at 202 and 230 Upper Grosvenor Road	459; Local Plan Allocation AL/RTW 6	1
RTW 7	Land at Former Gas Works, Sandhurst Road	SALP AL/RTW10 (Local Plan Allocation AL/RTW 7)	1
RTW 9	Land at Beechwood Sacred Heart School	SALP AL/RTW16 (Local Plan Allocation AL/RTW 9)	1
RTW 11	Former Plant & Tool Hire, Eridge Road	Local Plan Allocation AL/RTW 11, including SALP AL/RTW6 and site 176	2 and 3
RTW 15	Land at Showfields Road and Rowan Tree Road	Local Plan Allocation AL/RTW 15, including site 267 and additional land	1
RU 1	Lifestyle Motor Europe, Langton Road	SALP AL/RTW9 (Local Plan Allocation AL/RU1)	1
SA 2	Sharps Hill Farm, Queen Street	DPC12	1
SO 2	Land at Mabledon House	Local Plan Allocation AL/SO 2, including most of site 90	1
SO 3	Land at Baldwin's Lane, North Farm Road	DPC13 (Local Plan Allocation AL/SO3)	1

Appendix 2: Continued

Sites indicated as being in Flood Zone 2

AL/RTW 10	Montacute Gardens	<p>Small proportion (less than 10%) of site in NW corner subject to FZ2 / 3b which would be outside of the developable area of the allocation, and subject to a full FRA at application stage.</p> <p>Planning permission 23/00518/FULL granted and houses delivered.</p>
AL/RTW 11	Former Plant and Tool Hire, Eridge Road	<p>26% of the site is located within Flood Zone 3b with climate change impacts, which would be outside of the developable area of the allocation, and subject to a full FRA at application stage.</p> <p>Planning permission 21/03298/FULL granted for 40 retirement apartments which is being constructed.</p>
AL/RTW 14	Land at Tunbridge Wells Garden Centre, Eridge Road	<p>20% of the site would be within Flood Zone 3b with climate change, which would be outside of the developable area of the allocation, and subject to a full FRA at application stage.</p> <p>The site is allocated for mixed use development with commercial and residential.</p>
AL/RTW 18	North Farm Land Fill site, North Farm Industrial Estate	<p>2% of the site would be within Flood Zone 3b with climate change, which would be outside of the developable area of the allocation, and subject to a full FRA at application stage.</p> <p>The site is allocated for renewable energy, sport or recreation.</p>
AL/RTW 21	Colebrook Sports Field	<p>9% of the site would be within Flood Zone 3b with climate change, which would be outside of the developable area of the allocation, and subject to a full FRA at application stage.</p> <p>The site is allocated for residential and open space provision.</p>
AL/PW 1	Land at Mascalls Farm, Paddock Wood	<p>1% of the site would be within Flood Zone 3b with climate change, which would be outside of the developable area of the allocation, and subject to a full FRA at application stage.</p>

		<p>Planning Permission is in place for the site which is being delivered.</p> <p>Rfes: 17/03480/FULL / 19/02533/FULL / 19/03349/FULL</p>
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Appendix 3: PPG Table 1: Flood Zones

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
Zone 2 Medium Probability	Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	<p>This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:</p> <ul style="list-style-type: none"> • land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or • land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding). <p>Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)</p>

Appendix 4: Flood risk vulnerability and flood zone ‘incompatibility’

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

Key:

✓ Exception test is not required

X Development should not be permitted

Appendix 5: Annex 3 of the NPPF

Flood risk vulnerability classification

ESSENTIAL INFRASTRUCTURE

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood.
- Wind turbines.
- Solar farms

HIGHLY VULNERABLE

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)

MORE VULNERABLE

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

LESS VULNERABLE

- Police, ambulance and fire stations which are not required to be operational during flooding.

- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.
- Car parks

WATER-COMPATIBLE DEVELOPMENT

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.