



**Eastbourne Plan (Submission Core  
Strategy Development Plan  
Document)**

**Matter Statement 2: Overall  
Spatial Strategy**

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## **2.1 IS THE SPATIAL STRATEGY SOUNDLY BASED, TO ADDRESS THE KEY ISSUES FOR EASTBOURNE?**

2.1.1 The spatial development strategy (Policy B1) seeks to deliver at least 5,022 new dwellings and 55,430 square metres of employment space which is required to meet and support local housing need and economic growth. The evidence for this need is provided in Submission Documents CS16 'Employment Land Review' (2008), CS17 'Employment Land Review Addendum' (2010) and CS29 'Strategic Housing Market Assessment (2009).

2.1.2 The spatial strategy is soundly based, conforming with the requirements of the National Planning Policy Framework (NPPF), 2012 (paragraph 182) in that:

- (i) **Positively prepared;**
- (ii) **Justified;**
- (iii) **Effective;**
- (iv) **Consistent with national policy.**

### **(i) Positively Prepared**

2.1.3 The strategy seeks to deliver the required amount of residential and employment land within a tightly constrained urban location. As Eastbourne is primarily an urban local authority, priority has been given to brownfield sites where there are opportunities for increased development through urban intensification. The spatial strategy allows for the creation of two sustainable centres in the Town Centre and Sovereign Harbour, where future housing provision will be balanced alongside the significant improvements to infrastructure and community facilities to ensure sustainable development and sustainable growth.

2.1.4 Submission document CS30 'Sustainable Neighbourhood Assessment' (2011) provides the evidence behind the identification of six sustainable neighbourhoods for the Core Strategy. These neighbourhoods can support a

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higher density of residential development because of their availability of local community facilities and services to support development.

2.1.5 The spatial development strategy actively seeks to address the key issues identified in section 1.3 of the Core Strategy, as follows:

- **Lack of suitable housing** – the strategy provides opportunities for an increased number and variety of residential accommodation. On larger sites a mix of housing sizes and types can be provided;
- **Town centre** – the strategy allows for development of underutilised land in the Town Centre, and high density development to use land more efficiently in a sustainable neighbourhood;
- **Over-reliance of private car** – the development of sustainable centres and providing development within sustainable neighbourhoods, allows greater opportunities for sustainable travel. As services and facilities are more prevalent in sustainable neighbourhoods, there is a reduced dependency on the private car;
- **Appearance of town** – the strategy provides opportunities for redevelopment and regeneration of sites and neighbourhoods;
- **Diverse population** – the provision of a variety of housing sizes and types and its supporting infrastructure, including local services and facilities provides Eastbourne’s diverse population with its local needs.

2.1.6 The spatial development strategy also helps meet the following the following key spatial objectives (KSO) of the Core Strategy:

- **KSO1 Sustainable development** – the strategy is balanced by the delivery of infrastructure identified in the Infrastructure Delivery Plan (IDP) to support growth;
- **KSO2 Sustainable growth** - the strategy meets the principles of sustainable development by directing growth to the most sustainable neighbourhoods;
- **KSO3 Town centre regeneration** – the strategy allows for the mixed use development of key Town Centre sites;

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- **KSO4 Local economy** – the strategy identifies the level of economic growth required, providing opportunities for new businesses and local businesses to develop and grow. A variety in size of business floor space will ensure a vibrant local economy;
  - **KSO8 Sustainable travel** – growth is directed to areas in which sustainable means of travel can be utilised;
  - **KSO10 Sustainable neighbourhoods** – growth is directed to those neighbourhoods with greatest capacity of residential growth.

### **(ii) Justified**

2.1.7 The Core Strategy provides the most appropriate spatial development strategy when compared against reasonable alternatives. The Council has provided evidence and justification for its preferred spatial development strategy through Submission Document CS41(B) 'Spatial Development Options Feedback Report' (2010) why alternative spatial options and development areas were not deliverable. The justification of the spatial development strategy is answered fully in the Council's response to Matter Question 2.2.

### **(iii) Effective**

2.1.8 The spatial development strategy is deliverable over the plan period, with the necessary infrastructure required to support growth identified in the Infrastructure Delivery Plan (2011) [Submission Document CS33], demonstrating cross-boundary cooperation on strategic infrastructure matters such as transport provision.

### **(v) Consistent with National Policy**

2.1.9 The spatial development strategy is consistent with the policies in the NPPF, in seeking positive improvements to the built, natural and historic environment as well as people's quality of life (paragraph 9) and reflects local circumstances to respond to the different opportunities for achieving

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sustainable development (paragraph 10) The spatial development strategy assists and enables sustainable development and the creation sustainable communities (Policies D1 and B2 of the Core Strategy).

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## 2.2 IS IT CLEAR WHAT OTHER STRATEGIC OPTIONS WERE CONSIDERED AND WHY THEY WERE DISMISSED?

2.2.1 The Core Strategy has evolved through several formal consultation stages (explained in detail in Submission Document CS43 'How Did we get here?'), in which comprehensive engagement was undertaken with stakeholders and local residents:

2.2.2 **'Issues and Options' consultation, 2005** (Submission Document CS39) – this stage considered three 'growth options':

- a) Urban Management – delivery within the existing built up area boundary;
- b) Greenfield Urban Extension – development on greenfield land outside of the built up area boundary;
- c) Combined Urban Management and Limited Greenfield Development – combination of elements of 'a' and 'b'.

2.2.3 Responses received from the consultation helped develop the **'Preferred Options Report', 2006** (Submission Document CS40). This evaluated various housing options (options 'a' to 'r') under the following spatial objectives:

- (1) to ensure that development will be focused on sustainable locations where infrastructure is or will be provided in a timely manner;
- (2) to provide an urban emphasis for development and support an urban renaissance;
- (3) to ensure a high quality built and natural environment that minimises resource consumption and maximises energy efficiency;
- (4) to deliver a range of housing (including affordable housing) that meets a wide range of needs for a diverse population;
- (5) to supply a level of housing development that meets the needs of the local population.

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2.2.4 Five Preferred Options were outlined in the Preferred Options Report (Submission Document CS40) for each of these five objectives.

2.2.5 The Council further developed its spatial strategy approach to the Core Strategy in preparation for the Core Strategy Spatial Development Options, 2009 (Submission Document CS41). During this time the Council engaged with stakeholders and infrastructure providers to develop four distinct spatial development options for housing growth across the Borough. The options proposed were:

1. **Urban Intensification;**
2. **Creating Sustainable Centres;**
3. **Sustainable Neighbourhoods;**
4. **Greenfield Urban Extensions**

2.2.6 Submission Documents CS41(B) and (C) 'Spatial Development Options Feedback Report' (2010) provide the responses made to the consultation, and the Council's justification for moving forward with its proposed strategy. The underlying purpose of the Council's spatial development strategy has always been to maximise the provision of housing development within the built up area through urban intensification. During the spatial options stage the Council also looked for available greenfield opportunities to form sustainable urban extensions. The evidence prepared for the Core Strategy concluded that only land at Kings Drive/Cross Levels Way were developable. In order to maximise the provision of land for housing development and minimise the reliance on windfall development, the final spatial development option proposed in the Core Strategy was a combination of elements of the four spatial development options.

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**2.3 IN THE LIGHT OF THE CREATION OF THE ADJACENT SOUTH DOWNS NATIONAL PARK, IS THE PLAN CLEAR AND CONSISTENT IN DEFINING THE AREA TO WHICH SAVED LOCAL PLAN POLICIES WILL APPLY AND THE AREA TO WHICH EASTBOURNE PLAN POLICIES APPLY?**

- 2.3.1 The Core Strategy provides a clear explanation in paragraph 1.1.15 that its policies relate to the area of Eastbourne outside of the South Downs National Park (SDNP). To ensure policy coverage in the SDNP area before the adoption of its own Core Strategy and other Local Development Documents, the Council liaised with the National Park Authority to 'save' relevant and appropriate policies in the Eastbourne Borough Plan. The 'saved' policies of the Eastbourne Borough Plan (2003) therefore relate to the whole of the Eastbourne borough boundary which still includes the SDNP. Appendix D of the Core Strategy provides a list of deleted policies. These do not prevent the SDNP having a suitable level of policy coverage before its own Local Development Framework Documents are adopted as the policies either do not relate to SDNP area, or policy coverage can be provided by national policy in the National Planning Policy Framework.
- 2.3.2 For clarity, the Council proposes through Minor Modification 2 (MC2) in Submission Document CS2 'Schedule of Proposed Minor Changes to the Core Strategy' to add the definition of 'Eastbourne' in Appendix A: Glossary of Terms, with the definition 'Eastbourne refers to all that part of the Eastbourne area excluding the South Downs National Park.'

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## **2.4 IS THERE ROBUST EVIDENCE TO DEMONSTRATE THAT A MINIMUM OF 70% OF THE BOROUGH'S HOUSING PROVISION CAN BE DELIVERED ON PREVIOUSLY DEVELOPED LAND?**

2.4.1 The 'Core Strategy Schedule of Development Sites' Submission document CS38(B) provides a list of identified sites for the Core Strategy, indicating whether these sites are greenfield or brownfield in nature. This demonstrates that 85.6% (2,008 net units out of a total of 2,297 net units) of the identified sites are on previously developed land (brownfield land) and that the overall amount of identified residential development will meet the previously developed land target.

2.4.2 The 'Windfall Housing Delivery Briefing Note' (2011) (Submission document CS31) and CS31(A) 'Appendix A: Detailed Windfall Delivery Analysis' (2011) explains the method used for determining the anticipated level of windfall delivery in future years of the plan period. Table 7 of Submission Document CS31 demonstrates that on average, an annual delivery of 88.1 net units is projected to be achieved on conversion sites and 7.4 net units on 'change of use' developments. Both of these types of development will be on previously developed (brownfield land) as they will involve subdivision of a larger premises, without new build on green land or garden space, or would involve change use from non-residential to residential. Therefore approximately 86.6% of new windfall development will be on previously developed (brownfield) land.

2.4.3 The Council has explained its position on windfall delivery in response to questions from the Inspector (Submission Document L12. EBC- Response to questions from the Inspector- Letter 28<sup>th</sup> March). It substantiates the amount of anticipated windfall units on brownfield land that will come forward annually during the plan period. Together on identified and windfall sites the Council is therefore expected to deliver at least 70% of new residential development on previously developed land.

2.4.4 The Council also has evidence of a strong level of housing delivery historically on previously developed land. The Council's Annual Monitoring Report (2010/2011) [Submission Document CS37] highlights that 73.4% of housing

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delivery in 2011/2012 was on brownfield land. In each of the four previous monitoring years (2009/10, 2008/9, 2007/8 and 2006/7) 100% of housing delivery was on previously developed land.

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## **2.5 DOES THE OVERALL STRATEGY TAKE ACCOUNT OF THE SEQUENTIAL APPROACH TO FLOOD RISK?**

- 2.5.1 The Council's spatial development strategy is strongly in accordance with the requirements of the sequential test and the NPPF (2012). The 'Sequential and Exception Test' (2011) (Submission document CS23) explains how the Council has considered the availability of land within low flood risk zones and then justified bringing forward development within flood zone 2 and then tidal flood zone 3a on brownfield land within the built up area. The Council's approach to the sequential and exception test is directly informed by the Strategic Flood Risk Assessment, 2009 (Submission Documents CS26 and CS27) and supported by the Environment Agency. Appendix A provides a summary classification of the flood zones. This is taken from the Appendices to the Technical Guidance to the National Planning Policy Framework (March 2012) previously contained in PPS25: Development and flood Risk.
- 2.5.2 The Council considered the sequential approach to indentifying sites for residential development as a major consideration in the Strategic Housing Land Availability Assessment (SHLAA). This is summarised in paragraph 1 of the 'Housing Briefing note on SHLAA Submission Document CS28(F)'. This ensured that all opportunities on all types of land and development were evaluated before brownfield areas within higher flood risk areas were considered.

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## **2.6 SHOULD THE STRATEGY ALLOW FOR A SUSTAINABLE URBAN EXTENSION?**

- 2.6.1 In its Housing Trajectory the Council has included one sustainable urban extension: Land at Kings Drive/Cross Levels Way. This site was granted outline planning permission on 27 October 2010 (EB/2010/0003) for 119 residential units. When developed this Greenfield site will extend the neighbourhood boundary of Ocklynge/Rodmill next to the Eastbourne District General Hospital.
- 2.6.2 The Council has provided evidence in the Council's Response to questions from the Inspector- Letter 28<sup>th</sup> March (Submission Document L12) in paragraphs 2.1 to 2.10 and 3.1 to 3.2 to justify the exclusion of other greenfield sites as sustainable urban extensions as part of its spatial development strategy.

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## **2.7 IS THE OVERALL STRATEGY SUFFICIENTLY FLEXIBLE TO RESPOND TO CHANGING CIRCUMSTANCES SUCH AS NON DELIVERY OF ESSENTIAL INFRASTRUCTURE?**

2.7.1 The Eastbourne Plan (Core Strategy) Section B (paragraphs 2.1.13 to 2.1.14) provides an explanation of the contingency to Policy B1: Spatial Development and Distribution. It outlines that the plan needs to include sufficient flexibility to deal with changing circumstances and that its success depends on the delivery of Policy E1 Infrastructure Delivery.

2.7.2 Paragraph 2.1.14 (i) outlines the steps the Council will take if the expected amount of development does not come forward. This ranges from assessing the risk of a prolonged downturn in delivery to working with landowners and developers to bring sites forward earlier. Paragraph 2.1.14 (ii) relates specifically to infrastructure. This outlines that the Council would respond to the non-delivery of essential infrastructure by reviewing the local priorities for spending the Community Infrastructure Levy (CIL), and seeking additional funding streams, such as the New Homes Bonus to help deliver the priority infrastructure to unblock future growth.

2.7.3 The Council will regularly update its Infrastructure Delivery Plan (IDP) to take account of any changing circumstances on infrastructure provision during the plan period. Risk management will be essential to ensure that contingency planning is in place for later in the plan period.

2.7.4 The Council has also commissioned work on an updated Strategic Housing Market Assessment for Eastbourne, which commenced in February 2012. This provides an opportunity to look at early contingency measures for housing, to address issues such as a prolonged downturn in housing delivery.

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## Appendix A

### Extract from Technical Guidance to the National Planning Policy Framework

#### **Table 1: Flood zones**

*(Note: These flood zones refer to the probability of river and sea flooding, ignoring the presence of defences)*

<p><b>Zone 1 - low probability</b></p> <p><b>Definition</b> This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (&lt;0.1%).</p> <p><b>Appropriate uses</b> All uses of land are appropriate in this zone.</p> <p><b>Flood risk assessment requirements</b> For development proposals on sites comprising one hectare or above the vulnerability to flooding from other sources as well as from river and sea flooding, and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the new development on surface water run-off, should be incorporated in a flood risk assessment. This need only be brief unless the factors above or other local considerations require particular attention.</p> <p><b>Policy aims</b> In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of sustainable drainage systems<sup>2</sup>.</p>
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## Zone 2 - medium probability

### Definition

This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.

### Appropriate uses

Essential infrastructure and the water-compatible, less vulnerable and more vulnerable uses, as set out in table 2, are appropriate in this zone. The highly vulnerable uses are *only* appropriate in this zone if the Exception Test is passed.

### Flood risk assessment requirements

All development proposals in this zone should be accompanied by a flood risk assessment.

### Policy aims

In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development, and the appropriate application of sustainable drainage systems.

## Zone 3a - high probability

### Definition

This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

### Appropriate uses

The water-compatible and less vulnerable uses of land (table 2) are appropriate in this zone. The highly vulnerable uses should not be permitted in this zone.

The more vulnerable uses and essential infrastructure should only be permitted in this zone if the Exception Test is passed. Essential infrastructure permitted in this zone should be designed and constructed to remain operational and safe for users in times of flood.

### Flood risk assessment requirements

All development proposals in this zone should be accompanied by a flood risk assessment.

### Policy aims

In this zone, developers and local authorities should seek opportunities to:

- reduce the overall level of flood risk in the area through the layout and form of the development and the appropriate application of sustainable drainage systems;

- 
- relocate existing development to land in zones with a lower probability of flooding; and
  - create space for flooding to occur by restoring functional floodplain and flood flow pathways and by identifying, allocating and safeguarding open space for flood storage.

### **Zone 3b - the functional floodplain**

#### **Definition**

This zone comprises land where water *has* to flow or be stored in times of flood.

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. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. But land which would flood with an annual probability of 1 in 20 (5%) or greater in any year, or is designed to flood in an extreme (0.1%) flood, should provide a starting point for consideration and discussions to identify the functional floodplain.

#### **Appropriate uses**

Only the water-compatible uses and the essential infrastructure listed in table 2 that has to be there should be permitted in this zone. It should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows; and
- not increase flood risk elsewhere.

Essential infrastructure in this zone should pass the Exception Test.

#### **Flood risk assessment requirements**

All development proposals in this zone should be accompanied by a flood risk assessment.

#### **Policy aims**

In this zone, developers and local authorities should seek opportunities to:

- reduce the overall level of flood risk in the area through the layout and form of the development and the appropriate application of sustainable drainage systems;
- relocate existing development to land with a lower probability of flooding.

**Table 2: Flood risk vulnerability classification**

<p><b>Essential infrastructure</b></p> <ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.</li> <li>• Wind turbines.</li> </ul>
<p><b>Highly vulnerable</b></p> <ul style="list-style-type: none"> <li>• Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Caravans, mobile homes and park homes intended for permanent residential use<sup>3</sup>.</li> <li>• Installations requiring hazardous substances consent<sup>4</sup>. (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")<sup>5</sup>.</li> </ul>
<p><b>More vulnerable</b></p> <ul style="list-style-type: none"> <li>• Hospitals.</li> <li>• Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Landfill and sites used for waste management facilities for hazardous waste<sup>6</sup>.</li> <li>• Sites used for holiday or short-let caravans and camping, <i>subject to a specific warning and evacuation plan</i>.<sup>7</sup></li> </ul>
<p><b>Less vulnerable</b></p> <ul style="list-style-type: none"> <li>• Police, ambulance and fire stations which are <i>not</i> required to be operational during flooding.</li> <li>• Buildings used for shops, financial, professional and other services,</li> </ul>

<sup>3</sup> For any proposal involving a change of use of land to a caravan, camping or chalet site, or to a mobile home site or park home site, the Sequential and Exception Tests should be applied.

<sup>4</sup> See Circular 04/00: *Planning controls for hazardous substances* (paragraph 18) at: [www.communities.gov.uk/publications/planningandbuilding/circularplanningcontrols](http://www.communities.gov.uk/publications/planningandbuilding/circularplanningcontrols)

<sup>5</sup> In considering any development proposal for such an installation, local planning authorities should have regard to planning policy on pollution in the National Planning Policy Framework.

<sup>6</sup> For definition, see *Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10* at [www.communities.gov.uk/publications/planningandbuilding/planningsustainable](http://www.communities.gov.uk/publications/planningandbuilding/planningsustainable)

<sup>7</sup> See footnote 3.

<p>restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in "more vulnerable", and assembly and leisure.</p> <ul style="list-style-type: none"> <li>• Land and buildings used for agriculture and forestry.</li> <li>• Waste treatment (except landfill and hazardous waste facilities).</li> <li>• Minerals working and processing (except for sand and gravel working).</li> <li>• Water treatment works which do <i>not</i> need to remain operational during times of flood.</li> <li>• Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).</li> </ul>
<p><b>Water-compatible development</b></p> <ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Lifeguard and coastguard stations.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, <i>subject to a specific warning and evacuation plan.</i></li> </ul>

**Notes to table 2:**

a. This classification is based partly on Department for Environment, Food and Rural Affairs and Environment Agency research on *Flood Risks to People (FD2321/TR2)*<sup>8</sup> and also on the need of some uses to keep functioning during flooding.

b. Buildings that combine a mixture of uses should be placed into the higher of the relevant classes of flood risk sensitivity. Developments that allow uses to be distributed over the site may fall within several classes of flood risk sensitivity.

c. The impact of a flood on the particular uses identified within this flood risk vulnerability classification will vary within each vulnerability class. Therefore, the flood risk management infrastructure and other risk mitigation measures needed to ensure the development is safe may differ between uses within a particular vulnerability classification.

**Table 3: Flood risk vulnerability and flood zone ‘compatibility’**

Flood risk vulnerability classification (see table 2)	Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood zone (see table 1)	Zone 1	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓
	Zone 3a	Exception Test required	✓	✗	Exception Test required
	Zone 3b functional floodplain	Exception Test required	✓	✗	✗

Key:        ✓ Development is appropriate.  
              ✗ Development should not be permitted.

**Notes to table 3:**

This table does not show:

- a. the application of the Sequential Test which guides development to Flood Zone 1 first, then Zone 2, and then Zone 3;
- b. flood risk assessment requirements; or
- c. the policy aims for each flood zone.