Sequential Test Assessment

Existing commercial and residential site Change to residential scheme: Flood designed dwellings and highest form of SUDS scheme

Scheme results in reduction in flood risk overall and NPPF compliant flood future-proofed properties

At:

2 - 4 Send Road, Caversham, Reading RG4 8EH

October 2021

Ark Environmental Consultancy Ltd

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1.0 Introduction

This report contains the details of a Sequential Test carried out by ARK Environmental Consulting Limited ("ARK Ltd") for 2 - 4 Send Road, Caversham, Reading RG4 8EH, henceforth referred to as "the site" in this report.

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2.0 Scope

This Sequential Test Planning Note has been carried out, where feasible, in accordance with the National Planning Policy Framework (NPPF) and PPG.

It is to be used to assist the Local Planning Authority (LPA) when considering the principle of locating development of this nature at this site, as part of a planning application accompanied also by a site-specific flood risk assessment (Ark Ltd 2021) which concluded the scheme could be constructed and operated safely in flood risk terms without increasing flood risk elsewhere.

<u>Site: Site Location and Status</u>

The site is located one property south of the junction of Gosbrook Road and Send Road. There is also an access and border with Forge Close to the east.

See AppA for site location.

The site is in FZ3; the council have requested for similar sites and schemes a site-specific sequential test as this development site is not an official allocation site included in their most up to date adopted Local Plan (2019).

Refer to site specific Flood Risk Assessment & SUDS Strategy for Planning (Ark, 2021).

3.0 Council Pre-Application Response and Our Response

The critical points relating to the sequential test for our site, apart from updating the test report to the new adopted Local Plan included:

a) The council stated the Local Plan status in their Pre-App response

> "*The Council's latest 'Housing and Economic Land Availability Assessment' (May 2017) notes that 'there are not sufficient sites to meet the objectively assessed need for housing in Reading on sites in Flood Zones 1 and 2'. Therefore, subject to a detailed sequential test assessment being submitted as part of any application it may be possible to demonstrate that an application for additional residential development on the site could pass the sequential test."*

b) The council therefore stated that:

> *"You would be required to demonstrate through the sequential process that a site with a lower probability of flood risk is not reasonably available, a case could be put forward as to why the development could be considered as an exception."*

Our Response

Included in this sequential test assessment is therefore:

i) a review of the Reading Local Plan 2019, the HELAA and the Strategic Flood Risk Assessments / Sequential and Exception Tests

ii) a review of all allocation sites relevant to the sequential test of this particular site (commensurate and similar) as a full sequential analysis of potentially reasonable alternative sites

iii) a review of all other identified non-allocation but potential plan period sites, relevant to the sequential test of this particular site (commensurate and similar) as a full sequential analysis of potentially reasonable alternative sites

4.0 Development Policy & Consultation

4.1 Reading Strategic Flood Risk Assessment Level 1 and Level 2

The SFRA's promote the guidance and requirements of the NPPF for flood risk.

The SFRA's identify the flood risk posed to and from the potential allocation sites that need to be reviewed as part of the Local Plan.

The Level 2 reviews allocation and other potential sites that are in FZ3 and FZ2; the FZ3 sites are not relevant to this sequential test as they are not in a lower flood risk zone.

See section on sequential analysis and sites reviewed.

4.2 Reading Local Plan 2019

The Local Plan (2019 Adopted) in terms of flood risk policy is similar to many councils that have a large allocation requirement and where a large proportion of the suitable area i.e. good communication links / infrastructure / existing urban areas is next to a river / the sea and in FZ2 / FZ3.

The intrinsic regeneration potential of sites was therefore used in other policy documents as a specific contributary factor to passing the sequential test where appropriate for this very reason i.e. central urban areas that are not appropriate to allow to remain vacant / dilapidated.

As the Local Plan states:

> "Development will be directed to areas at lowest risk of flooding, in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change…Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on and off site."

Critically, the Local Plan also states that for the plan period, there is a "shortfall of 230 dwellings that cannot be provided within Reading."

In addition, the Local Plan states:

> "However, Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space. Provision of new housing therefore involves a heavy reliance on previously developed land, and the supply of such sites constrains the amount of housing that can be delivered in the Borough. The Council therefore needs to set targets for housing provision that are capable of being met."

4.3 Reading Housing 2020 – 2025 & "Reading 2050 Vision

These documents continue to support appropriate sustainable development and do not alter the housing numbers, the core strategies of the Local Plan or the SHLAA.

4.4 Sequential & Exception Test of Sites in the Local Plan

This report provides the required tiered approach to the sequential test for Reading council.

In this Reading council report, there is a section entitled:

"STAGE C: IDENTIFY THE LEVEL OF DEVELOPMENT NEED THAT CAN BE MET IN FLOOD ZONE 1"

This section of Reading's report reviews each site in the relevant regeneration site lists eg: the Housing and Economic Land Availability Assessment (HELAA) by flood zone, it then states that "After these 100% Flood Zone 1 sites are taken into consideration, there clearly remain very significant levels of development need that cannot be met – around two thirds of the remaining housing need."

In conclusion the report states in Section 4.4:

"Therefore, it is clear that if the full needs for development are to be accommodated within Reading, use of sites within higher risk flood zones will be required".

This report sets the suitability of the site in question due to quantitative need.

In conclusion "there are not sufficient sites to meet the objectively assessed need for housing in Reading on sites in Flood Zones 1 and 2".

There are a number of sites, including one adjacent to the south which are assessed.

It is duly noted that the site to the south (4-6 Send Road) is not an allocation site, however, Reading council provide a conclusion on this site, which is in a higher flood risk than the subject site:

> "The development passes the sequential test for allocation for residential use, due to the fact that the identified development needs cannot be accommodated on sequentially preferable sites."

The justification for our site passing the Sequential Test is further substantiated by the next sections which provide the sequential assessment for this particular site.

4.5 Reasonable Alternatives Assessment: Reading Allocation Sites

A process we have undertaken for several sequential tests is to see if the proposed number of dwellings could be accommodated on any of the existing allocation sites in lower flood risk zones and of those, only sites which currently do not have a planning permission.

However, the reason for that methodology is when the council in question has demonstrated it can meet the required housing targets.

If we were to state we could build our proposed number of dwellings on one of the FZ2 or FZ1 allocation sites for the Reading plan period, this would be non-sensical, because the council has a quantified shortfall and must still use sites at a higher flood risk.

However, in order to provide a robust, exhaustive and rigorous sequential assessment, a review of the full allocations and non-allocations list has been undertaken; **this provides the additional evidence that should the council's policy on the shortfall suddenly change, this particular site and development can still pass the sequential test.**

The site is no longer required to operate for the existing use and is in a central residential area.

4.6 All Reasonable Alternative Sites & Sequential Analysis 2021

As an agreed exhaustive approach to a sequential analysis of this particular site, we have undertaken a review of all allocation sites and also all non-allocation sites that were included in the full list of sites within the HELAA 2017, Volume II: Detailed Tables (Reading Council, 2017).

The specifications of a "reasonable alternative" are known for such a sequential test and are listed below relevant to this particular site:

1. Sites in FZ1 and FZ2 which are in a lower flood risk than the subject site
2. Sites with existing permission are not available
3. Sites which have additional constraints are not reasonably available (justifications required such as dependency on 3rd party funding or complications of lots of different landowners involved)
4. The timescale required to secure a site for development: it is only reasonable to be available in the current plan 5 year period (i.e. it is reasonable to assume that should planning be granted, the scheme could be built within that timeframe)
5. The specifics of the site being commensurate (justification such as access & egress, proximity to constraints that could require onerous mitigation or significant design changes)
6. The size of the site being commensurate

As a worse case and hence exhaustive and rigorous approach, we have therefore reviewed:

The HELAA Volume II: Detailed Site Tables (all allocation sites and all non-allocation potential sites in Reading)

We then reviewed all sites according to the below criteria:

A. All allocation and non-allocation potential sites that are in FZ1 or FZ2

B. All allocation and non-allocation potential sites that are 0.05ha to 0.095ha in size

C. Sites with two-sided access for reduced access constraints

D. The larger sites between 0.06ha and 0.09ha are either unavailable or already have planning permission and are mostly the size of sites where existing buildings such as Public Houses are to be converted and hence are not comparable

<u>Result</u>

There are no Local Plan allocation or Local Plan review non-allocation potential sites that are reasonable alternatives in accordance with the sequential test.

- **Therefore, it is considered that this site can pass the Sequential Test.**

See below for the list of sites which Reading have considered under categories A and B above and the reasons why they are not reasonable alternatives / not available:

HELAA Volume II All Sites in FZ1 or FZ2 and between 0.05ha and 0.095ha			
Local Plan Site Allocation / Council Site Reference from HELAA	**Site Address / Ward**	**Size**	**Reasonable Alternative Analysis**
KA010	79 Silver Street	0.079	From planning application for 56 student bedrooms, now permitted subject to S106 agreement

KA034	9 Southern Court, South Street	0.05	Town Centre site; existing building and conversion of existing footprint. Not reasonable alternative site.
AB061	17-23 Queen Victoria Street	0.05	Town Centre site; Access is limited by location in pedestrianised street. Conversion of Listed Building. No amenity space. Not reasonable alternative site
AB066	Elite House, 179 Kings Road	0.055	HELAA states: Site not available for next 15 years
AB101	Part of City Wall House, 26 West Street	0.05	HELAA states: Site not available for next 15 years
AB102	Tangent House, 16 Forbury Road	0.05	HELAA states: Site not available for next 15 years
MI012	4 Berkeley Avenue	0.055	Stated only as a "prospect site". Previous permissions but only potentially available with private landowners. Site is an operational 2nd hand car dealership. Island site surrounded by highways; potential highways constraints. Adjacent to the A4; potential additional constraints of air quality given the shape of the site would require development to be immediately adjacent to the A4.
AB094	160-163 Friar Street	0.06	Permissions granted. 6 storey existing building in city centre. Conversion. No amenity space. Not reasonable alternative site.
KA005	83-85 London Street	0.06	Permissions granted. Conversion. No amenity space. Not reasonable alternative site.

4.7 FRA & NPPF Exception Test

The Exception Test is of two parts; the first part relates to demonstrating suitable wider sustainability credentials of a scheme. In flood risk terms, the FRA demonstrates quantitatively that the scheme can reduce flood risk overall. Other technical, design and planning reports accompanying the application further demonstrate the wider sustainability credentials of the scheme.

The site and scheme specific FRA which accompanies this application is in itself the second part of the Exception Test, demonstrating the scheme can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere.

Critical: The site can be greatly improved in flood risk terms and reduce flood risk in the area:

- The scheme will result in modern integrated flood designs
- The scheme will not increase flooding elsewhere
- In fact, the scheme reduces flood risk overall by removing footprint from the 1in100year+NEW climate change allowances floodplain
- This means flood storage will be increased, reducing flood risk to surrounding properties

5.0 Conclusion

The scheme and site are considered appropriate in principle in flood risk terms (see full FRA also) and it is considered that the scheme can pass the NPPF / PPG Sequential Test.

It is considered that the scheme could pass the Sequential Test based on the fact that the development needs cannot be accommodated on sequentially preferable sites, the Local Plan's identified need for housing and the wider sustainability credentials of the scheme.

This is supported by Reading's own Local Plan and Sequential Test report and the exhaustive assessment of all sites as part of this sequential test assessment for this particular site.

The site can also be greatly improved in flood risk terms and reduce flood risk in the area. The separate site-specific FRA concludes that the scheme can pass the Exception Test:

> "Based on the likely flooding risk, it is considered that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere, in fact reducing flood risk overall, and is therefore appropriate development in accordance with the NPPF / PPG"