

Proposed Drive-Thru Coffee Shop at Reading Link Retail Park, Rose Kiln Lane, Reading

Sequential and Exceptions Test

October 2020





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Section 1

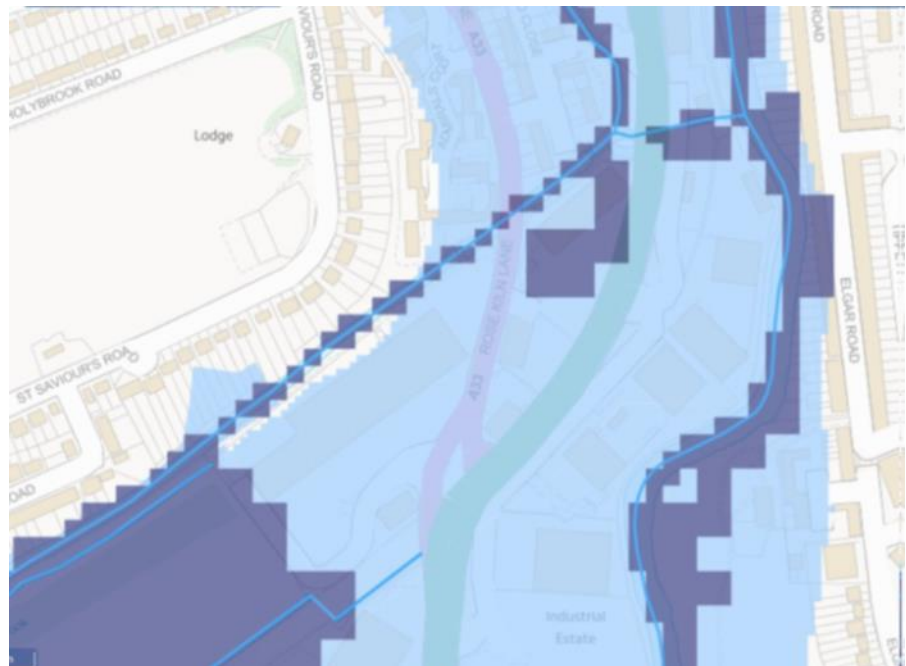
Introduction

- 1.1. These Sequential and Exceptions Tests have been prepared in support of a planning application for:

Outline permission for a drive-thru coffee shop (Class E) of 189sqm and a new access at Reading Link Retail Park, Rose Kiln Lane

- 1.2. The site lies within Flood Zone 2. See Figure 1.

Figure 1: Site Location Plan and Flood Zones



- 1.3. It is within an existing retail park within Reading that lies on the A33 corridor on a main thoroughfare into and out of the town centre. The proposals will be entirely located on the existing hardstanding area of the car park which will require the construction of a new access onto Rose Kiln Lane and a new drive-thru coffee shop facility.
- 1.4. The NPPF and PPG require an applicant to demonstrate compliance with the Sequential Test to identify that there are no reasonably available sites in areas

with a lower probability of flooding that would be appropriate for the type of development proposed.

1.5. With regard to this test, the following key points are important to note:

- ▣ The site is within an existing retail location which is entirely appropriate for this use.
- ▣ The FRA submitted with the application demonstrates that the proposals will result in no increased risk to flooding

1.6. Following this introduction, the Sequential Assessment contained within this report is structured as follows:

- ▣ Section 2: Description of the site and summary of the site's planning history
- ▣ Section 3: Description of the Methodology used in the Sequential Test
- ▣ Section 4: Sequential Test and Site Analysis

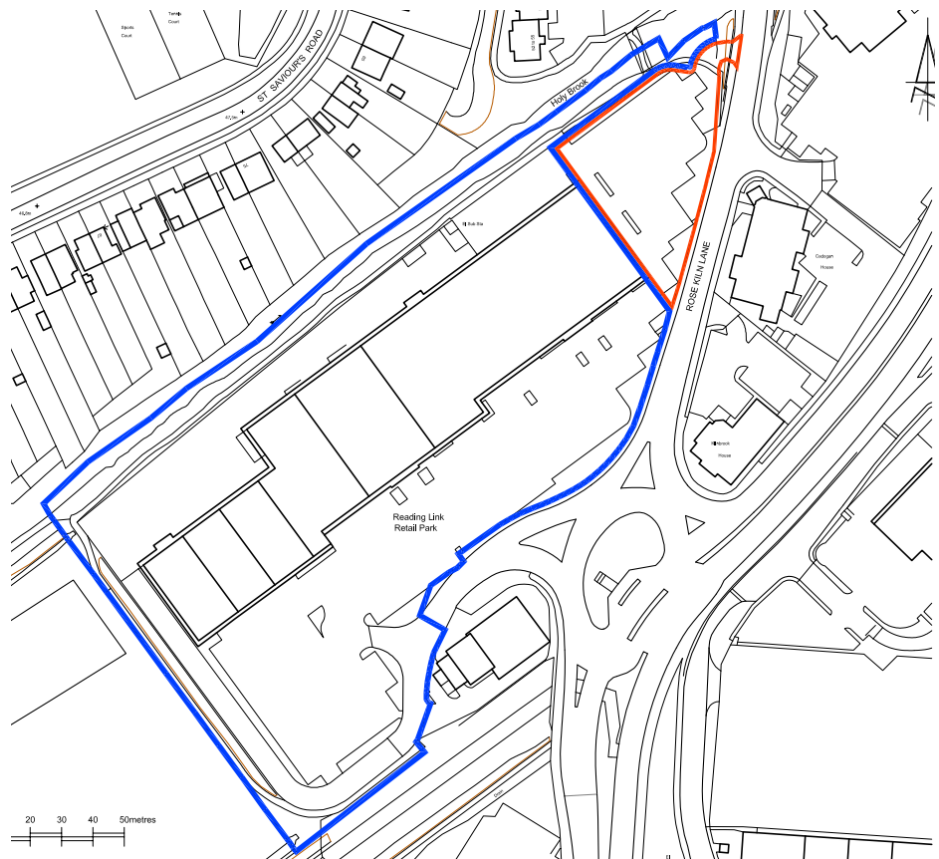


Section 2

Site and Surrounding Area

- 2.1. The site is located just off of the A33 on Rose Kiln, which leads into Reading town centre when travelling north from the M4. There are a number of other business, retail, and industrial parks on the A33, as well as new developments providing hotels, residential and retail/employment opportunities along the A33 corridor. The sites location is shown in Figure 2 below.

Figure 2: Site Location Plan



- 2.2. The retail park is made up of one continuous building with the eastern half set slightly further back into the plot than the western half. There are five retailers at the retail park; Matalan (3 units), Home Bargains, Iceland, Magnet and Benson for Beds. Only Benson for Beds has a mezzanine floor, whilst Matalan has a 'vaulted' roof. There is one vacant unit that was previously Pound World.
- 2.3. A detailed review of the site and its surroundings is included in the planning statement.

Planning History

- 2.4. A detailed planning history for the site is set out in the supporting Planning Statement that accompanies this planning application. The drive-thru coffee shop that was withdrawn following comments from statutory consultees. It is worth noting that no issues were raised with the flooding sequential test which was submitted with that application. Other recent applications at the site are limited to extensions to the retail units and insertion of mezzanine floors.

Planning Policy Context

- 2.5. A full account of the planning context as set out in the Planning Statement
- 2.6. The Council's current planning policy context of relevance to this site is contained within the Borough Local Plan (adopted November 2019). Relevant policies in this document are:
-  Policy CC1: Presumption in Favour of Sustainable Development
 -  Policy CC6: Accessibility and the Intensity of Development
 -  Policy CC7: Design and the Public Realm
 -  Policy EN2: Areas of Archaeological Significance
 -  Policy EN11: Waterspaces
 -  Policy EN12: Biodiversity and the Green Network
 -  Policy EN14: Trees, Hedges and Woodlands
 -  Policy EN18: Flooding and Drainage
 -  Policy TR1: Achieving the Transport Strategy
 -  Policy TR3: Access, Traffic and Highway-Related Matters
 -  Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
 -  Policy RL2: Scale and Location of Retail, Leisure and Culture Development



Section 3

Sequential Test Methodology

- 3.1. This section sets out the methodology used in this sequential test in terms of the site search and subsequent analysis.

Policy Context

- 3.2. The NPPF at paragraphs 158 to 160 sets out the guidance in relation the sequential and exception tests on sites at risk of flooding.

158 The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding...

159. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainability objectives), the exception test may have to be applied...

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

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

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

- 3.3. Further guidance is set out in the National Planning Policy Guidance. In respect of Sequential Tests, it states:

The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones as refined in the Strategic Flood Risk

3.4. Furthermore:

*For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of 3 Sequential Test Methodology development proposed. When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken.
Paragraph: 033 Reference ID: 7-033-20140306*

The site

- 3.5. The retail proposals for the application site fall within the 'Less Vulnerable' category in Table 1 of the Flood Risk tables. This use is compatible with Flood Zone 2 as Identified in the Flood Risk Vulnerability Classification table. This indicates that, while the Sequential Test needs to be assessed, the Exceptions Test does not need to be undertaken.

Site Search

Stage 1: Site Identification

- 3.6. The Council published a Housing and Economic Land Availability Assessment (November 2017). The assessment in this study considers those available sites within the HELAA. These sites are appropriate for consideration as they are a list of 'available' sites as required for consideration in the Sequential Test.

Stage 2: Parameters for comparable sites

- 3.7. The proposals are for a 189sqm drive-thru coffee shop to be located on an existing retail park. The site is located in a Flood Zone 2 area but this use is appropriate in this location having regard to the vulnerability classification. A sequentially preferable site must be located in located flood zone 1 but other considerations for alternative suitable sites include:

- ❑ It should be located somewhere suitable for retail use either within an existing retail park or retail location

- ☐ Sufficient space is required to enable drive-thru customers and access for servicing

- 3.8. It is recognised that such locations are limited and that setting a strict limit on the required size for an alternative site would not be appropriate for the purposes of this sequential test. However, the site should not be smaller than the 186sqm and be in a location where the drive-thru requirements can be accommodated.

Stage 3: Flood Zone Identification

- 3.9. For a site to be considered sequentially preferable it must be located in a more preferable flood zone i.e. in this case Flood Zone 1 as this site is within Zone 2.
- 3.10. The Environment Agency's online flood zone map and the Council's revised Strategic Flood Risk Assessment (Level 1, June 2017) will be used to determine the relevant flood zone for each site to determine suitability.

Stage 4: Desk-Based Site Assessment

- 3.11. The final stage of the process is a desk-based site assessment using publicly available information. This assessment will identify 'reasonably available' sites and considers the following:
- ☐ Whether the site available for development i.e. it is vacant or not currently under construction?
 - ☐ The site is free from encumbrances such as complex ownership situations or ransom situations
 - ☐ Whether there is any recent planning activity and decisions that would render a site unavailable or unsuitable for retail development.
 - ☐ Any other known development constraints i.e. contamination
- 3.12. The findings of this sequential test are set out in the following chapter.



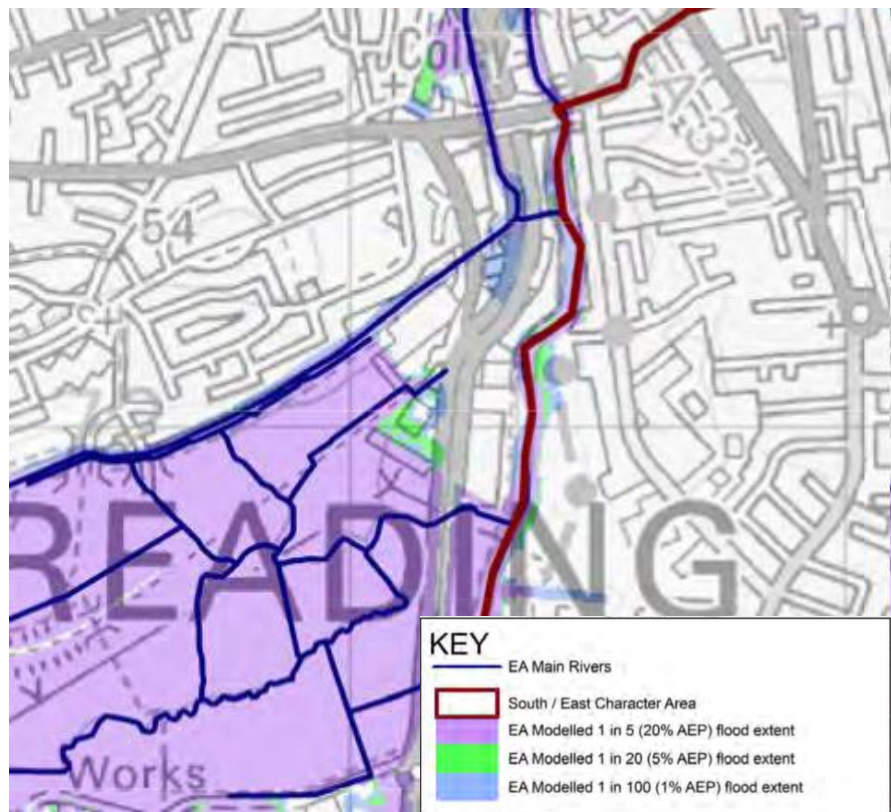
Section 4

The Sequential Test – Site Analyses

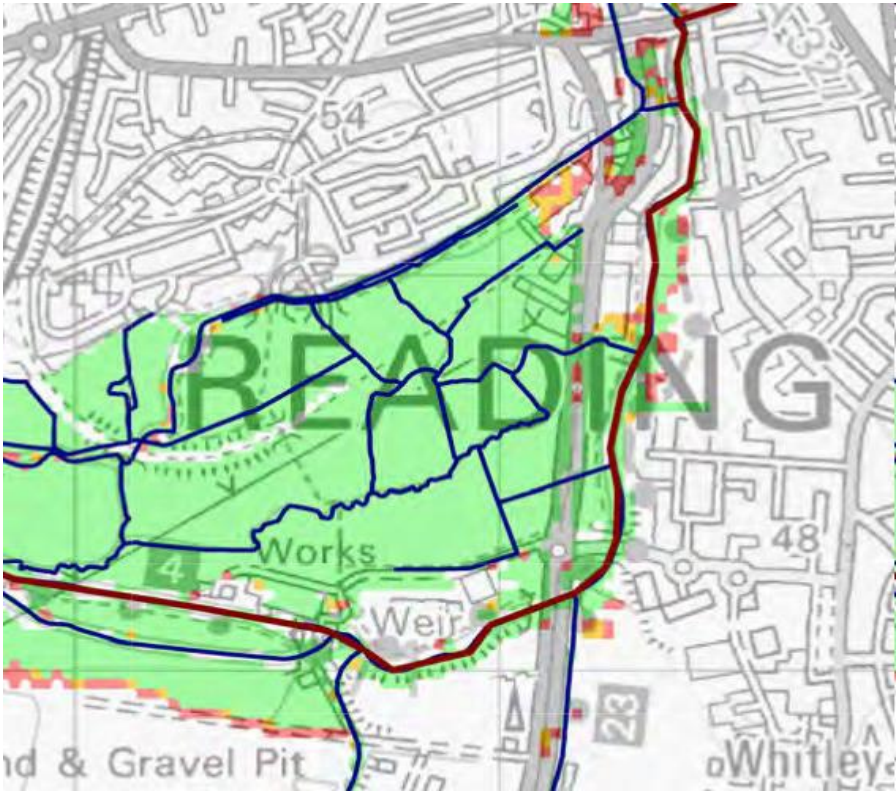
The Application Site

- 4.1. Reading Borough's SFRA provides a series of maps showing the site in the context of flood in the local area and these are set out in Figure 3-5 below.

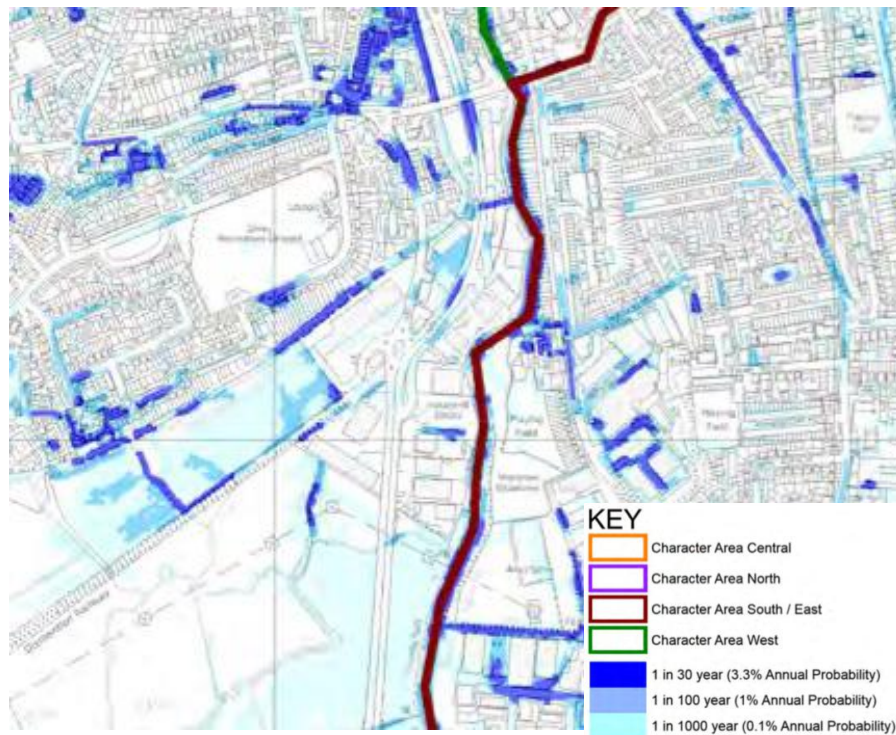
**Figure 3: SFRA EA
Modelled Flood Extents**



**Figure 4: SFRA EA
Modelled Flood Extents-
Climate Change
Allowances**



**Figure 5: SFRA
Flood Map for
Surface Water**



Site Analysis

4.2. Table One summaries those sites that have been identified as suitable alternative sites following the methodology set out in Section 3.

Table One: Site Analyses

Site Name/Location	Size	Comments
Friars Walk and Greyfriars Road (reduced site)	870sqm	Flood Zone 1 Site is in the town centre in a mixed-use development. There is no opportunity to enable a drive thru restaurant.
Station Hill (wider site)	13500sqm	Flood Zone 1 Site is in the town centre in a mixed-use development. There is no opportunity to enable a drive thru here
173-175 Friar Street	100sqm	Flood zone 1 Site is too small Site is in the town centre in a core shopping location. There is no opportunity for drive-thru restaurant
Jacksons Corner, 9 Kings Road	1288sqm	Flood zone 2 Not a sequentially preferable site
Primark, 32- 42 West Street	4305sqm	Flood Zone 1 Site is in the town centre in a Core Shopping location There is no opportunity to enable a drive-thru restaurant
34 Parkside Road	137sqm	Too small Located in a residential area and, therefore, an unsuitable location for a retail use
Little Chef, Basingstoke Road	237sqm	Flood zone 1 Site has been redeveloped for a van hire location and is, therefore not available for development
177 Basingstoke Road	761sqm	Flood Zone 1 Under construction for student accommodation and therefore not available for development
Land west of Rivermead Car Park	425sqm	Flood Zone 2 Not a sequentially preferable site
21 Rose Kiln Lane	1125sqm	Flood Zone 2 Not a sequentially preferable site
The Meadway Centre, Honey End Lane	3908sqm	Flood Zone 1 An existing pedestrianised shopping centre surrounded by residential properties. The site would not accommodate a drive thru coffee shop without detriment to surrounding residential amenity. This is not considered to be a suitable alternative site.
Worton Grange	6260sqm	Flood Zone 1/2 Site is a large mixed-use development comprising a mix of uses as well as areas of public open space. A drive thru coffee shop would not be appropriate in this location. Not a sequentially preferable site
Green Park Village, Longwater Avenue	684sqm	Flood Zone 2 Not a sequentially preferable site
Kings Point, 120 Kings Road	352sqm	Flood Zone 1 Site is in the town centre in a mixed-use development. There is no opportunity to enable a drive thru restaurant
St Martin's Precinct, Church Street	1025sqm	Flood Zone 2 Not a sequentially preferable site

Summary

- 4.3. For the reasons set out in Table One the identified suites are either not sequentially preferable sites or have other barriers to redevelopment of the site for a drive-thru coffee shop.
- 4.4. For these reasons, the Sequential Test is considered to have been passed.



Section 5

Exceptions Test

- 5.1. The National Planning Policy Guidance sets out the situation where proposals must pass the Exceptions Test along with the Sequential Test.
- 5.2. The site lies in Flood Zone 2 and is for a retail use. The Flood Risk Vulnerability Classification indicates that in such case the Exceptions Test does not need to be carried out as the proposed use is compatible with its flood risk classification.

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