



now part of



2-4 Send Road, Caversham

Flood Risk Sequential Test and Exception Test

On behalf of **Abodi Investments Ltd**

Project Ref: 46089/4001| Rev: v3 | Date: May 2019

Office Address: Peter Brett Associates LLP, Caversham Bridge House, Waterman Place, Reading, Berkshire
T: +44 (0)118 950 0761 E: reading@peterbrett.com

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	Name	Position	Signature	Date
Prepared by:	Conor Lenon Mhairi Summers	Graduate Planners	CL/MS	07.05.19
Reviewed by:	Gemma Care	Associate	GC	09.05.19
Approved by:	Gemma Care	Associate	GC	10.05.19
For and on behalf of Peter Brett Associates LLP				

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1 Introduction

1.1 Overview

- 1.1.1 Peter Brett Associates LLP (PBA) has been instructed by Abodi Investments Ltd. to undertake a Sequential Test and Exception Test in relation to flood risk in relation to the proposed development of 16 apartments (14no. one-bedroom flats and 2no. two-bedroom flats) with associated parking at 2-4 Send Road, Caversham.
- 1.1.2 As confirmed by the Environment Agency's Flood online flood map service, the site lies within Flood Zone 3a ('High Probability'). To comply with the requirements of local and national planning policy, a Sequential Test must demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate for the type of development or land use proposed. The Exception Test must then demonstrate that, subject to and following the Sequential Test, the development provides wider sustainability benefits to the community that outweigh the high probability of flooding (Part 1) and is accompanied by an appropriate site-specific Flood Risk Assessment (FRA) to demonstrate that the development is safe for its lifetime (Part 2).
- 1.1.3 The purpose of this document is to demonstrate that the development proposal for the site complies with the Sequential Test and Exception Test in accordance with the requirements of the National Planning Policy Framework (NPPF) and accompanying 'Flood Risk and Coastal Change' planning practice guidance. The report is also prepared in accordance with the Environment Agency's 'Flood Risk Assessment: The Sequential Test for Applicants' (April 2012) guidance. It should be read in conjunction with the accompanying FRA.

2 The Site and Scheme Proposal

2.1 Site Location

- 2.1.1 The site is located at 2-4 Send Road in Caversham, within the administrative boundary of Reading Borough Council (RBC). A Site Location Plan is provided at **Figure 1** below.
- 2.1.2 The site currently contains one residential unit adjacent to a commercial unit. The site is bordered by Send Road to the west, a car paint service to the north, a residential unit and Forge Road to the east, and a tyre shop and carwash to the south.
- 2.1.3 The site is currently unallocated for development.



Figure 1: Site Location Plan

2.2 Background

- 2.2.1 Most new developments in Reading have taken place on previously developed land. As stated in the RBC Annual Monitoring Report (2018), 91% of new dwellings have been developed on previously developed land.
- 2.2.2 Owing to the fact the site lies within Flood Zone 3a and has been categorised by the EA as a 'more vulnerable' use, a Sequential Test and Exception Test has been undertaken.

2.3 Proposal

- 2.3.1 The proposed development is for the demolition of a residential unit and the adjacent print works and the construction of 16 dwellings with associated parking, as shown on the submitted plans for approval and as outlined in the accompanying application material.

3 Sequential Test

3.1 Introduction

- 3.1.1 The Environment Agency's online flood map indicates that the site lies within Flood Zone 3a ('High Probability'). As a result of this, this assessment considers sites sequentially preferable to Flood Zones 3, whereby the annual probability of flooding is classified as between 1 and 100 and 1 in 1,000 annual probably (Flood Zone 2) or less than a 1 in 1,000 annual probably of river flooding (Flood Zone 1) (refer to FRA for further details).

National Planning Policy Framework (February 2019, Revised) (NPPF)

- 3.1.2 The NPPF seeks to direct development away from areas with the highest risk of flooding. Where development is necessary, we must ensure the scheme is made safe for its lifetime, without increasing flood risk elsewhere, as noted at paragraph 155.

- 3.1.3 The revised NPPF states at paragraph 158 that:

The aim of the sequential test is to steer new development to areas with the lowest risk 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 risk of flooding.

- 3.1.4 Where there are no reasonably available sites appropriate in Flood Zone 1, decision-makers should consider the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 and then Flood Zone 3. So as to meet the requirements of the Sequential Test, it must be demonstrated that there are no 'reasonably available' alternative sites within a lower probability of flooding that would be appropriate for the type of development proposed.

- 3.1.5 Consequently, this assessment has considered sites sequentially preferable to the probability of flooding of the application site, i.e. sites within Flood Zones 1 or 2, which would be appropriate to accommodate the Proposed Development.

- 3.1.6 The NPPF advises at paragraph 38 that:

Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

National Planning Practice Guidance (2014)

- 3.1.7 The National Planning Practice Guidance (PPG) defines Flood Zone 3a (High Probability) as 'Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.'
- 3.1.8 Residential use is falls within the 'more vulnerable' classification and therefore applies to our client's site. The PPG confirms that our clients proposed residential site ('more vulnerable') in Flood Zone 3a will require an Exception Test.

Reading Core Strategy 2008 (revised 2015)

- 3.1.9 Policy CS35 of the adopted Core Strategy deals with flooding. This policy states that planning permission will not be permitted for development in areas identified as being at high risk of flooding.
- 3.1.10 However, proposals will be considered if they provide significant regeneration benefits as stated in paragraph 11.2:

Appropriate weight will be given to the redevelopment of land at risk of flooding that provides significant regeneration benefits on previously developed land.

Reading New Local Plan (Submission Draft March 2018)

- 3.1.11 The New Local Plan for Reading is currently undergoing Examination. It is not yet adopted planning policy but given its advanced stage will carry significant weight in the determination of the submitted planning application. It is relevant therefore to note the contents of Policy EN18 'Flooding and Drainage' which 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 plan 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.

- 3.1.12 This document addresses the first component of EN18. The FRA provides detail to satisfy the remainder.

3.2 Approach to Sequential Test

- 3.2.1 The approach to the Sequential Test and therefore to satisfy the requirements of the NPPF includes the three tasks stated below:

Task 1 – Site Identification

- 3.2.2 The first task is to identify potential alternative sites to be assessed.
- 3.2.3 For a site to be considered a potential alternative to the application site, there needs to be a 'like for like' comparison: potential suitable sites need to be of a similar size and type and present an opportunity to support similar development proposals. For example, sites larger than the application site outside of the Caversham area are not considered - the type and size of site, as well as the characteristics of the surrounding area, would differ quite significantly across the Borough.
- 3.2.4 The application site is in a predominately residential area. Potential alternative sites in areas with similar surrounding characteristics within Caversham are therefore most appropriate for consideration. For completeness, PBA have assessed sites within a range of site sizes and yields so as to capture all alternative sites which could potentially deliver a similar scale of development.
- 3.2.5 As stated in **Chapter 2**, the application site is approximately 0.46 hectares in size and seeks to accommodate a block of 16 apartments with associated parking within Flood Zone 3a. To ensure that comparable sites are considered as part of this assessment, PBA have only included sites with the following search parameters:
- A site suitable for 8-24 dwellings

- Between 0.40 and 0.52 hectares in size;
- Located within Reading; and
- Located within Flood Zone 1 and 2.

3.2.6 A site search of available parcels of land within Reading was also undertaken using a desk top methodology.

Source Documents

3.2.7 Using the search parameters as stated in paragraph 3.2.5, all adopted and emerging policy and evidence documents have been reviewed for potential alternative sites. Source documents for Reading Borough Council (RBC) have been used as Caversham falls within this district boundary.

3.2.8 The most appropriate source is RBC's Housing and Economic Land Availability Assessment (2017) (HELAA). This document includes an extensive list of potential future housing sites.

3.2.9 In addition, PBA have considered sites identified within the RBC Local Plan, the Brownfield Land Register, RBC Residential Planning Commitments (2017) and RBC 5 Year Supply Statement. Sites have also been included which were identified using a desk top site search analysis.

Included Sites

3.2.10 The above parameters automatically include sites contained in:

- RBC HELAA (2017) - **Appendix 2**: Suggested available sites adjoining settlements.

Task 2 – Flood Zone Identification

3.2.11 The second task is to establish which flood zone the sites to be assessed are located in and therefore whether they are sequentially preferable to that of the application site. A review of the Environment Agency's online flood map service has been used to confirm which parts of the respective sites are in which flood zone.

3.2.12 As the application site is entirely located within Flood Zone 3a, this sequential test excludes sites in this flood zone. All relevant potential sites in Flood Zones 1 and 2 are therefore considered in this assessment as sequentially preferable.

Task 3 – Sites Assessment

3.2.13 The third task is to carry out a desk-based assessment, from publicly available information, of whether the sites identified are '*reasonably available*'. This assessment includes consideration of the below questions.

- When is the site available for development?
- Is the site currently occupied / in use?
- Are there multiple ownerships?
- Is compilation of several plots of land needed?
- Has there been any planning activity (a review of the planning history)?

- Is the site being pursued by other third-parties?
- Are there any known development constraints?

3.2.14 Answering these questions, as well as considering other key factors, will determine whether or not a site is a '*reasonably available*' and suitable alternative in comparison to the application site which is available for development now.

3.3 Findings of the Sequential Test

3.3.1 PBA undertook a wide search that considers sites included in RBC's adopted and emerging Local Plan and its evidence base that are considered able to provide a plot between 0.40 and 0.52 hectares in area and suitable to accommodate a block of 16 apartments with associated parking. **Appendix A** to this report sets out the sequential analysis.

3.3.2 A total of 10 sites have been considered in detail. It is evident from our assessment that;

- Have extant planning permission and are therefore not '*reasonably available*';
- Are being actively pursued for development by third-parties and are therefore not '*reasonably available*';
- Have multiple landowners / leaseholders which are unlikely / difficult to negotiate;
- Are entirely unsuitable for the type of development proposed in terms of the characteristics of the site and surrounding area; or,
- Development has commenced or is complete and therefore the site is unavailable and not '*reasonably available*'.

3.3.3 It is possible to conclude that there are no '*reasonably available*' or suitable alternative sites in a lower flood risk zone (Flood Zones 1 or 2) to accommodate the development proposals for the application site.

4 Exception Test

4.1 Introduction

- 4.1.1 The revised NPPF (February 2019) states at paragraph 159 that:

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

- 4.1.2 As detailed in **Chapter 3**, following application of the Sequential Test, it is possible to conclude in this instance that there are no '*reasonably available*' alternative sites to that of the application site in a lower flood risk zone to accommodate the development proposal.
- 4.1.3 The application site is located within Flood Zone 3a ('High Probability') and the development proposals are classified as residential and therefore classified as 'More vulnerable' use. As such, application of the Exception Test is required in this instance.
- 4.1.4 As stated at paragraph 160 of the revised NPPF (February 2019), 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.
- 4.1.5 In order to satisfy the requirements of the Exception Test therefore, it must be demonstrated that the development proposal complies with both parts (a) and (b) of paragraph 160 of the NPPF.

4.2 Exception Test Part 1

- 4.2.1 Part 1 of the Exception Test requires that the development provides '*wider sustainability benefits to the community*' that outweigh flood risk. Sustainability benefits in the context of the Exception Test are taken to mean those which have a benefit to the wider community and not just the occupiers for the lifetime of the development.
- 4.2.2 The Proposed Development will be constructed using sustainable methods of construction as detailed elsewhere in the application material. Moreover, it will deliver 16 new residential units including a proportion of affordable housing on a brownfield site in a highly sustainable urban location. In an area such as Reading which has tightly constrained boundaries but a very high level of housing need, the delivery of much needed new housing is considered to represent a wider sustainability benefit to the community that should be afforded significant weight in considering whether or not the Exception Test Part 1 is passed.
- 4.2.3 For the reasons set out above, together with information provided in supporting planning documentation, it is considered that the requirements of Part 1 of the Exception Test have been met.

4.3 Exception Test Part 2

- 4.3.1 Part 2 of the Exception Test, as stated in paragraph 160 of the revised NPPF requires that the development will be '*safe for its lifetime, taking into account the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall*'.

Where appropriate, this should be determined by undertaking a site-specific Flood Risk Assessment.

- 4.3.2 A Flood Risk Assessment (FRA) has been prepared by PBA in respect of the submitted planning application. The FRA demonstrates the that the development proposal will be safe for its lifetime and will not increase flood risk elsewhere. For this reason, it is considered that the requirements of Part 2 of the Exception Test have been met.

5 Conclusions

- 5.1.1 This Flood Risk Sequential Test and Exception Test has been prepared by Peter Brett Associates LLP (PBA) on behalf of Abodi Investments Ltd with regards to the proposed development at 2-4 Send Road, Caversham.
- 5.1.2 The application site is approximately 0.46ha and is located within flood zone 3a. The NPPF requires a Sequential Test to be undertaken to establish whether there are any reasonably available sites within a lower risk flood zone which are suitable to accommodate the proposed development.
- 5.1.3 PBA has undertaken an assessment of sites within Caversham which are in flood zones 1 and 2 and which can provide a plot between 0.40 and 0.52 hectares.
- 5.1.4 The Sequential Test assessment has shown that there are no housing sites that are sequentially preferable and available that could accommodate a similar number of residential dwellings. Therefore, the Sequential Test has been satisfied.
- 5.1.5 An Exception Test has been undertaken for the reasons outlined in Section 4. On account of the wider sustainability benefits afforded by the scheme (Part 1) and the findings of the accompanying Flood Risk Assessment (Part 2) we submit that the Exception Test has been met.

Appendix A Sequential Test Assessment Table

PBA Ref	Source	RBC Council Ref	Site Address	Planning Application Ref	Site Area (ha)	Current Land Use	Flood Zone	Availability	Suitability	Alternative Site?	Comment
1	RBC HELAA (2017)	M1018	Yeomanry House, Castle Hill	N	0.44	Residential /Office	1	Y	N	N	The site is potentially suitable as the HELAA states that 11 units are deliverable. However, the site is currently owned by a public authority and is a Grade II listed building located within a listed building so is not sequentially preferable. For these reasons the site is not considered a suitable site for development.
2	RBC HELAA (2017)	RE010	3-29 Newcastle Road	150287	0.47	Residential	1	N	N	N	The site is potentially suitable as the HELAA states that 18 units are deliverable. However, the site has multiple landowners which are unlikely/difficult to negotiate, especially given a recent permission at 29 Newcastle Road for the change of use to a 9 bedroom house in Multiple Occupation with part single storey and part two storey side and rear extensions.
3	RBC HELAA (2017)	SO003	Alice Burrows Home	N	0.48	Vacant	1	Y	N	N	The site is potentially suitable as the HELAA states that 20 units are deliverable. However, there is currently a Tree Preservation Order (TPO) on the site (ref: 12/08) and the site is also located within an area of potential archaeological significance. The site is also allocated in the Sites and Detailed Policies Document for residential care. For these reasons, the site is not considered suitable alternative for development.

PBA Ref	Source	RBC Council Ref	Site Address	Planning Application Ref	Site Area (ha)	Current Land Use	Flood Zone	Availability	Suitability	Alternative Site?	Comment
4	RBC HELAA (2017)	KA009	272-274 Elgar Road South	N	0.41	Industrial	1	Y	N	N	The site is a former industrial site located within a predominately industrial area and is only listed within the HELAA as 'Potentially Developable'. Loss of employment would have to be justified. The site is not considered to represent a suitable alternative given policy restrictions and potential incompatibility with surrounding uses.
5	RBC HELAA (2017)	KA016	268 Elgar Road South	N	0.41	Industrial	1	Y	N	N	The site is a former industrial site located within a predominately industrial area and is only listed within the HELAA as 'Potentially Developable'. Loss of employment would have to be justified. The site is not considered to represent a suitable alternative given policy restrictions and potential incompatibility with surrounding uses.
6	RBC HELAA (2017)	RE006	University of Reading, London Road	150730	0.45	Non-residential institution	1	Y	N	N	There is an existing permission on the site for the conversion of existing buildings to 53 dwellings. The plan also confirms that the construction has commenced. The site is not available nor suitable.
7	RBC HELAA (2017)	TH007	The Arthur Clarke Home, Dovedale Close	152277	0.48	Residential	1	Y	N	N	Planning Permission was granted in 2016 for the erection of a 1-4 storey building comprising 43 extra care apartments (Class C2) with altered landscaping, 21 car parking spaces and associated works, following demolition of existing buildings. Since approval, several discharge of conditions applications have been submitted as recently

PBA Ref	Source	RBC Council Ref	Site Address	Planning Application Ref	Site Area (ha)	Current Land Use	Flood Zone	Availability	Suitability	Alternative Site?	Comment
											as January 2019. The site is not a suitable alternative for development.
8	RBC Brownfield Register	B23005	Land adjacent to 40 Redlands Road	N	0.43	Vacant	1	Y	N	N	According to the Local Plan Submission Draft (3028), there is a Tree Preservation Order (TPO) (ref: 99/01) on the site and the site is also located within a Conservation Area. Therefore, the site is not considered a suitable alternative for development.
9	Reading Borough Local Plan Submission Draft (2018)	WR3t	Land at Armour Hill	N	0.45	Residential	1	Y	N		The site is partially within an area of potential archaeological significance and there is also a Tree Preservation Order (TPO) (ref: 24/00) on the site. For these reasons, the site is not considered a suitable alternative.
10	RBC Residential Planning Commitments (2017)	141908	471-173 Oxford Road	141908	0.43	Residential	1	Y	N	N	Planning permission was granted in 2016 for the flat conversion from 1 x 2 bedroom flat to 1 x 1 bedroom flat and 1 x studio flat. Therefore, this site cannot be considered as a reasonable alternative.