
Sequential Test

28-32 Northfield Road and 26-30 Swansea Road,
Reading, RG1 8AH

Elstree Land Ltd



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1. Introduction

- 1.1 This Sequential Test has been prepared on behalf of Elstree Land Ltd in support of a planning application for the redevelopment of the site at 28-32 Northfield Road and 26-30 Swansea Road, Reading, to provide 9 residential units.
- 1.2 The application site extends to 0.29 hectares and is currently contains one 2 bedroom property and some garages. The site is an 'L' shape and is bound on its western and southern edges by adoptable highway and to its north and east by residential properties.
- 1.3 The planning application proposal is for the following development:
- “Full planning application for the demolition of the existing 2-bedroom dwelling and garages, and erection of nine dwellings, including eight three-bedroom houses and one three-bedroom coachouse, with access and parking from Swansea Road, and associated landscaping”.*
- 1.4 The site falls within Flood Zone 2, as confirmed on the Environment Agency's Flood Map for Planning. This means that there is a medium probability of flooding and the site has between a 1 in 100 and 1 in 1,000 annual probability of river flooding.
- 1.5 This Sequential Test should be read in conjunction with the site-specific Flood Risk Assessment (FRA) submitted with the planning application. The FRA demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.

Structure of the Sequential Test

- 1.6 The structure of this Sequential Test is as follows:
- **Section 2** provides a description of the site and its context within the surrounding area;
 - **Section 3** includes a summary of the development proposals;
 - **Section 4** discusses the relevant planning policy framework;
 - **Section 5** contains the Sequential Test for the proposed development; and
 - **Section 6** presents our conclusions in respect of the proposals.

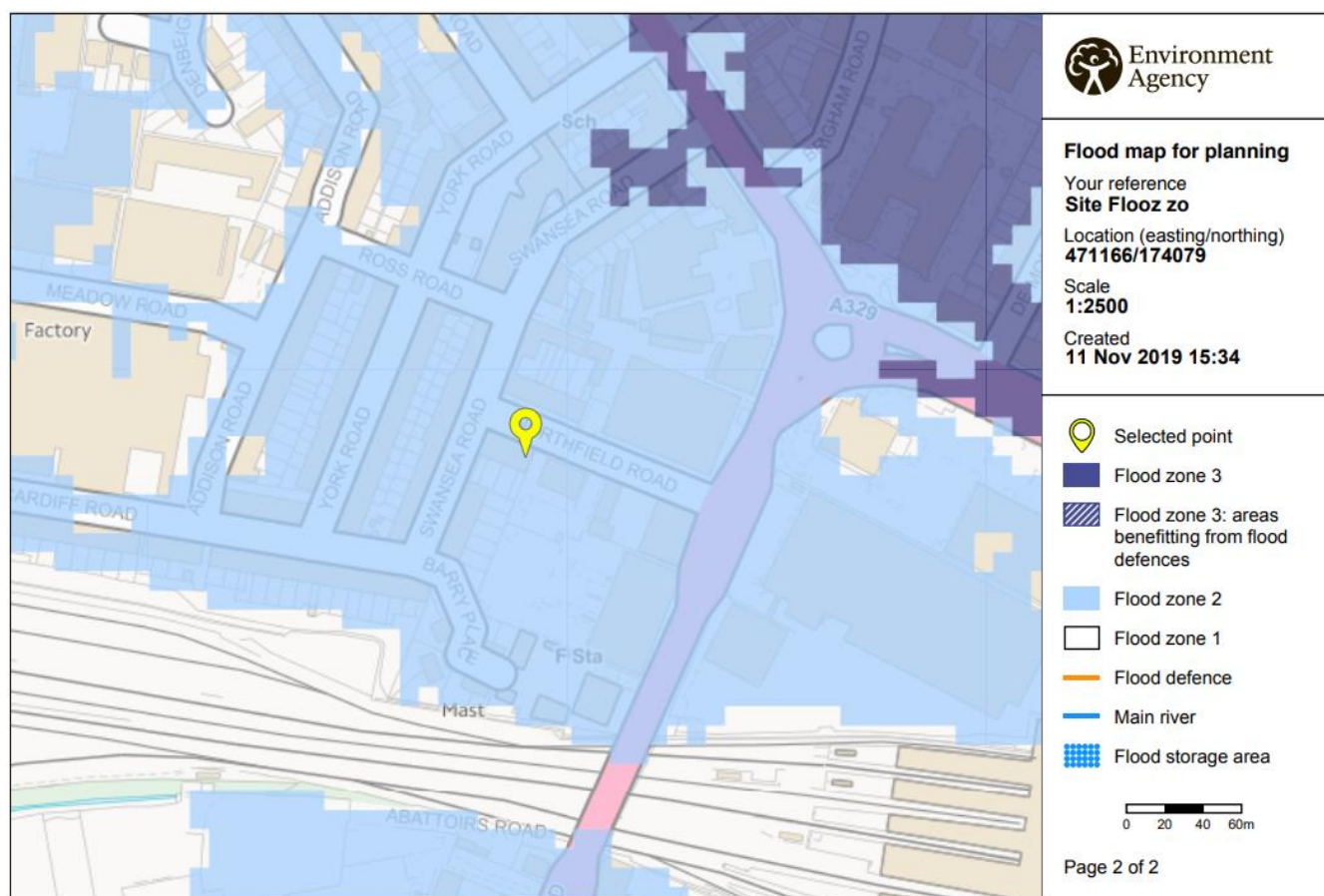
2. Site and Surrounding Area

- 2.1 28-32 Northfield Road and 26-30 Swansea Road is situated in Reading, Berkshire and lies within the jurisdiction of Reading Borough Council.
- 2.2 The site comprises a corner plot at the junction of Northfield Road and Swansea Road and consists of a two storey end of terrace dwelling with under croft access on Swansea Road and a series of garages fronting Northfield Road.
- 2.3 The garages fronting Northfield Road have historically been used for car repairs and MOTs. There is a small yard area to the rear of the garages with an existing vehicular access from Swansea Road.
- 2.4 The site is located adjacent to the town centre, and as such occupies a central and prominent position within Reading. Its central location also means it is less than 300m from Reading Mainline Railway Station which means London is easily within commutable distance from the site.
- 2.5 The site is accessed through various short side streets from the A329 (Reading's internal distributor road).
- 2.6 The site is in a mixed residential and commercial area which predominantly consists of modest two storey terraced dwellings. The east of the site is bordered by traditional terraced 3 bedroom homes, schools and direct access to Reading's town centre. At the site's southern boundary is further traditional terraced 3 bedroom homes and the mainline railway beyond that.
- 2.7 The site is located within the defined settlement boundaries of Reading and as such has a presumption in favour of development.
- 2.8 The site has no significant planning history and is currently in a poor state of disrepair.

Flood Risk at the Site

- 2.9 The Environment Agency's Flood Map for Planning gives an indication of the flood risk vulnerability of locations across the UK. An extract of the map for the site is shown below at Figure 2.1.

Figure 2.1: Extract from the EA Flood Map for Planning



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2.10 The site is within a Flood Zone 2. Flood Zones refer to the probability of flooding, also taking account of the presence of flood defences. Flood Zones are defined as follows:

- **Flood Zone 1 - Low Probability:** Land having a less than 1 in 1,000 annual probability of river or sea flooding (not coloured on the Flood Map);
- **Flood Zone 2 - Medium probability:** Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (coloured light blue on the Flood Map); and

- **Flood Zone 3 - High probability:** 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 (coloured dark blue on the Flood Map).

2.11 The Flood Zones shown on the Environment Agency's Flood Map do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding.

3. The Proposed Development

- 3.1 The planning application seeks full planning permission for the demolition of the existing two storey dwelling and garages at 28-32 Northfield Road and 26-30 Swansea Road and the development of the site for 9 residential dwellings. The development will provide eight 3 bedroom terraced houses and one 3-bedroom coach house.
- 3.2 The planning application is supported by various drawings, prepared by DHA Architecture, which illustrate the layout of the proposals and the street scenes.
- 3.3 The proposed scheme achieves a residential density of 31 dwellings per hectare. This figure is based on the provision of 9 units on a site area of 0.29 hectares.
- 3.4 The proposed continuation of the terraced form of development to both the Northfield Road and Swansea Road frontages is considered appropriate and integrates well with the surrounding area. Whilst the proposed plot sizes are narrow frontage dwellings, this is in keeping with the character and urban grain of the surrounding area. The proposals also maintain the existing uniform building line and roof profile alignment.
- 3.5 Due to the nature of the application site and its setting, careful consideration has been given in order to sympathetically integrate the site into its surroundings. Therefore, garden depths, unit depths and relationships with the adjacent neighbours have all been considered carefully.
- 3.6 The form and scale of the proposed dwellings respond positively to the local surroundings and buildings in order to sympathetically integrate the dwellings into the existing street scene. The residential buildings are terraced in form and are predominately 2 storeys in height, but accommodation is provided in the otherwise unused roof void, a common feature now for a significant number of existing houses following alteration.
- 3.7 There are no notable trees on site which are subject to a tree preservation order. The proposed layout allows for appropriate space to include high quality landscaping which will form an attractive and integral part of the scheme.
- 3.8 The site is currently accessed via numerous points and amending this to form a singular access will improve highways safety and traffic movement in the locality.

4. Planning Policy Context

National Planning Policy

- 4.1. National planning policy and guidance on flood risk is provided by the National Planning Policy Framework, 2019 (NPPF) and the Planning Practice Guidance (PPG).
- 4.2. Paragraphs 155 to 165 inclusive of the NPPF establish planning policy relating to flood risk management. The main focus of the policy is to direct development towards areas of the lowest practicable flood risk and to ensure that all development is safe, without increasing flood risk elsewhere.
- 4.3. The main considerations are:
- Applying the Sequential Test, and if necessary, applying the Exception Test;
 - Safeguarding land from development that is required for current and future flood management;
 - Using opportunities offered by new development to reduce the causes and impacts of flooding; and
 - Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.
- 4.4. The NPPF is clear that 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.”*
- 4.5. The PPG provides the methodology required to undertake the Sequential Test. The methodology undertaken for this Sequential Test is discussed further in Section 5 of this report.

Local Planning Policy

- 4.6. The Development Plan for Reading Borough Council currently comprises the Local Plan (adopted 2019) and the corresponding Proposals Map.
- 4.7. Local Plan Policy EN18 is the most relevant policy from the Local Plan. This states that:

“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. It will consider

flooding from all sources, including fluvial, surface water, groundwater and sewer flooding. 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.

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS."

Other Policy and Guidance

- 4.8. A discussion of further policy and guidance regarding flood risk management is contained within the FRA submitted in support of the planning application.

5. Methodology

- 5.1 The PPG advises that in undertaking the Sequential Test, an explanation should be provided about why the specific site has been chosen for development.
- 5.2 The site is not located within a designated core employment area and therefore the Council will have no in principle objection to loss of the former vehicle repair and MOT use. The site is predominantly surrounded by residential dwellings and therefore a new residential development will be beneficial to the amenity of existing nearby occupiers in terms of removal of a source of potential noise and disturbance.
- 5.3 The existing buildings proposed for demolition are in a poor state of disrepair and the buildings are not of any architectural merit. The proposals will therefore greatly improve the aesthetic of the site. The proposed dwellings will be of high quality design and contribute positively to the character of the area.

Identification of Potential Alternative Sites

- 5.4 For the purpose of this Sequential Test, sites have been identified through the Reading Housing and Economic Land Availability Assessment (HELAA). The latest update report was published in November 2017.
- 5.5 The purpose of the HELAA is to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the Local Plan period.

HELAA Methodology

- 5.6 The HELAA has assessed the supply of land for housing and economic development within the Borough, as recommended by the NPPF.
- 5.7 The Planning Practice Guidance sets out more detail on carrying out such assessments, and includes a basic methodology. It states that the purpose is to:
- Identify sites and broad locations with potential for development;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 5.8 The HELAA methodology is based on, and complies with, the standard methodology in the Planning Practice Guidance.

- 5.9 The date of the Reading HELAA is 1st April 2017 and represents the latest publically available assessment of sites across the Borough. Revised versions will be produced periodically in the future.

Sequential Test Methodology

- 5.10 The NPPF guidance on Sequential Tests outlines that 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.
- 5.11 In the absence of a clear definition of 'reasonably available', we have taken 'reasonably available' to mean the same as a 'deliverable' site. The definition of a deliverable site is provided in the glossary of the NPPF. A deliverable site should be:
- "Available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."*
- 5.12 Accordingly, this Sequential Test seeks to identify alternative sites within the Borough in areas of a lower risk of flooding, where there is evidence that the site is deliverable based on the above criteria.
- 5.13 To ensure that the alternative sites would be appropriate for the proposed development, it has been necessary to identify a sensible threshold within which the proposed scheme could be developed.
- 5.14 We have considered sites with a capacity for between 7 and 11 dwellings (i.e. +/- 2 dwellings from the proposed scheme) and are of the view that a site area of between 0.25 and 0.35 hectares would be able to accommodate this having regard to the need to provide suitable access, car parking and garden space.
- 5.15 We have discounted sites which were rejected through the HELAA process (i.e. sites on designated land, those with insurmountable constraints or sites in alternative use and not available for housing). We have also discounted sites with planning permission for housing where it is clear that the development has started or completed.
- 5.16 The PPG advises that an area of search can be agreed with the Local Planning Authority. Reading Borough Council has advised that the area of search in this instance should be the whole Borough, and so a search across the whole Borough has been undertaken.
- 5.17 We have reviewed all of the HELAA sites within the Borough and identified those which fall within the specified size threshold. Our assessment of these sites and conclusions on whether they are deliverable is set out in Section 6 of this report.

6. Sequential Test

- 6.1 A review of the May 2017 HELAA update report has identified the following sites that were promoted for 7-11 dwellings with an area of between 0.25 and 0.35 hectares. The sites are all within a Flood Zone 1 so have a lower probability of flooding than 28-32 Northfield Road and 26-30 Swansea Road.

Address	Ref. No.	Site Area	HELAA Assessment	Status
1 Castle Crescent	MI006	0.28ha	11 residential units Suitable Available Potentially achievable Deliverable (years 1-5)	Outstanding Planning permission
St George's Hall, St George's Road	NO005	0.31ha	11 residential units Suitable Available Achievable Deliverable (years 1-5)	No planning status
Rear of 13-14a Hawthorne Road & 282-292 Henley Road	PE004	0.37ha	10 residential units Suitable Potentially available Achievable Developable (years 6-10, 11-15)	No planning status
Charters Car Sales, Oxford Road	KE010	0.33ha	12 residential units Suitable Potentially available Potentially achievable Developable (years 6-10, 11-15)	No planning status

- 6.2 The HELAA assessment of MI006 states that the 0.28ha site is capable of delivering 11 units. In November 2016, planning permission was granted at 1-3 Castle Crescent for the reconfiguration of the existing building to provide 5 residential units and the construction of a new apartment block of 8 residential units (reference 151924). It is clear from a desk top review, that development of this scheme has started, and so this site is not able to accommodate the proposed development.
- 6.3 The HELAA assessment of site NO005 states that the 0.31ha site is capable of delivering 11 units. In March 2017, planning permission was granted for a church extension of 88sqm with dedicated parking area, core access road and construction of 12 affordable housing units with associated parking and amenity space (reference 152301). A desk top review of this site also confirms that the development of the affordable housing is almost completed, and so this site is also not able to accommodate the proposed development.

- 6.4 For site PE004, the HELAA anticipates the delivery of 10 units on the 0.37ha site. However, this site is only classified as 'developable', in years 6-10 to 11-15. As such, this site cannot be considered a 'reasonably available' site because it is not deliverable within five years. Moreover, the site is located within a suburban setting, over 800m away from the town centre so has a different context to the application site and would not lend itself to the type of accommodation proposed at 28-32 Northfield Road and 26-30 Swansea Road.
- 6.5 The same challenges are apparent for site KE010, where it is suggested 12 units have the potential to come forward on the 0.33ha site within the HELAA. Here, the site is also only classified as 'developable', in years 6-10 to 11-15 and therefore is deliverable within five years. The site is not in a town centre location and is located on the edge of the built-up-area of the borough, in Tilehurst. Given the prevailing dwellings are detached properties, the development proposed at 28-32 Northfield Road and 26-30 Swansea Road would not be suitable in this location and can therefore also be discounted as an alternative site.
- 6.6 Ultimately none of the identified HELAA sites within the search threshold are capable of delivering the proposed development at 28-32 Northfield Road and 26-30 Swansea Road. The sites are either constrained, not comparable or not deliverable in accordance with the NPPF definition so cannot be considered alternative 'reasonably available' sites for the purpose of the Sequential Test.

7. Conclusions

- 7.1 This Sequential Test has been prepared to support a full planning application for the demolition of the existing 2 storey dwelling and garages at 28-32 Northfield Road and 26-30 Swansea Road and the development of eight 2 storey terraced dwellings with rooms in the roof and one 2 storey coach house with rooms in the roof.
- 7.2 The NPPF is clear that 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.”*
- 7.3 In accordance with the NPPF and the PPG guidance regarding the Sequential Test, this report has sought to identify alternative ‘reasonably available’ sites within the Borough where the proposed development could take place in an area with a lower risk of flooding. Various HELAA sites have been discounted and it has been concluded that there are no sequentially preferable sites.
- 7.4 Importantly, the FRA accompanying this planning application demonstrates that the proposed development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.
- 7.5 Given there are no sequentially preferable sites within the Borough, and the safety of the proposed scheme has been confirmed in the FRA, it is respectfully requested that the proposals are approved at the earliest opportunity.