

SEQUENTIAL TEST STATEMENT

Ian Mikardo Way, Reading,
RG4 5BZ

PLANNING APPLICATION FOR THE CONSTRUCTION OF A NEW THREE-BED DWELLING AND ASSOCIATED PARKING AND ACCESS

SEQUENTIAL TEST STATEMENT

IAN MIKARDO WAY, READING, RG4 5BZ

ON BEHALF OF YORK ASSOCIATES/READING BOROUGH COUNCIL

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | **F** 01454 618074 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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1. INTRODUCTION

- 1.1 This note on the Sequential Test and Exceptional Test has been prepared by Pegasus Planning Group on behalf of York Associates and Reading Borough Council. It supports a full planning application for a new dwelling at the Ian Mikardo Way.
- 1.2 The levels of the site, when cross-referenced with the Environment Agency's flood map locates the site in Flood Zone 2.
- 1.3 Attached at Appendix 1 is an extract from the Environment Agency Flood Map showing the site and the Flood Zone in which it lies.

APPENDIX 1 – ONLINE FLOOD MAPPING

- 1.4 In accordance with the NPPF, certain developments in Flood Zone 2 require the Sequential Test to demonstrate that there are no other sequentially preferable available sites at a lower flood risk (i.e. in Flood Zones 1) that could reasonably accommodate the development.
- 1.5 Particular regard is given to advice held in Planning Practice Guidance and a number of documents that form key parts of the evidence base for the current revised Reading Local Plan (that is still undergoing consultation and plan making exercises).

2. POLICY CONTEXT

National Guidance

- 2.1 The requirement for a Sequential Test is set out in the National Planning Policy Framework (NPPF) which is supported by advice set out in the Planning Practice Guidance (PPG).
- 2.2 The NPPF sets out planning policy providing guidance on sustainable development within England.
- 2.3 The issue of development within areas liable to flooding is considered within paragraphs 155 to 165 of the NPPF.

2.4 **Paragraph 155** of the NPPF states:

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2.5 **Paragraph 158** deals with sequential test and states:

'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. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.'

- 2.6 Planning Practice Guidance supports the Government's planning policies for England and explains how these are expected to be applied.
- 2.7 The PPG provides a definitive schedule of flood risk vulnerability of land uses together with their flood zone 'compatibility'. These are provided in Table 1 and 2 below. The land uses pertinent to the application proposal are underlined for ease of reference.

Table 1: Flood risk vulnerability classification:-

Essential infrastructure • <i>Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</i> • <i>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.</i> • <i>Wind turbines.</i>
Highly vulnerable • <i>Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</i> • <i>Emergency dispersal points.</i> • <i>Basement dwellings.</i> • <i>Caravans, mobile homes and park homes intended for permanent residential use.</i> • <i>Installations requiring hazardous substances consent. (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').</i>
More vulnerable • <i>Hospitals.</i> • <i>Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.</i> • <u>Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</u> • <i>Non-residential uses for health services, nurseries and educational establishments.</i> • <i>Landfill and sites used for waste management facilities for hazardous waste.</i> • <i>Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.</i>
Less vulnerable • <i>Police, ambulance and fire stations which are not required to be operational during flooding.</i> • <i>Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.</i> • <i>Land and buildings used for agriculture and forestry.</i> • <i>Waste treatment (except landfill* and hazardous waste facilities).</i> • <i>Minerals working and processing (except for sand and gravel working).</i> • <i>Water treatment works which do not need to remain operational during times of flood.</i> • <i>Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.</i>
Water-compatible development • <i>Flood control infrastructure.</i> • <i>Water transmission infrastructure and pumping stations.</i> • <i>Sewage transmission infrastructure and pumping stations.</i> • <i>Sand and gravel working.</i> • <i>Docks, marinas and wharves.</i> • <i>Navigation facilities.</i> • <i>Ministry of Defence defence installations.</i>

- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

(sourced from Technical Guidance to PPG)

Table 2 flood risk and flood zone 'compatibility'

Flood risk	Essential infrastructure	High vulnerable	<u>More vulnerable</u>	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception test required	<u>✓</u>	✓	✓
Zone 3a	Exception test required	x	Exception test required	✓	✓
Zone 3b	Exception test required	x	x	x	✓
✓ - Development appropriate. X - Development should not be permitted.					

(sourced from Technical Guidance to PPG)

- 2.8 The Environment Agency's maps and associated information identify the application site as being a Zone 2 Medium Probability. The proposed use as a residential dwelling would fall under the '*more vulnerable*' category and therefore is appropriate development within Flood Zone 2 provided the Sequential Test is passed.
- 2.9 The PPG goes on further to advise that when applying the Sequential Test to individual planning applications states that;

"...the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed."

and

"For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives."

(Paragraph: 033 Reference ID: 7-033-20140306 - Revision date: 06 03 2014)

- 2.10 Therefore, the need to assess the development is restricted to a Sequential Test only as residential accommodation is compatible with flood zone 2.

3. SEQUENTIAL TEST

- 3.1 The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding with the overall aim to steer new development to flood zone 1.
- 3.2 Where there are no reasonably available sites in Flood Zone 1, local planning authorities in determining planning applications should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2. Residential development is appropriate in flood zone 2.
- 3.3 As part of the evidence base for the new Reading Local Plan the Council's has undertaken various assessment including a study on housing land availability. The latest 'Housing and Economic Land Availability Assessment' (May 2017) sets out in paragraph 5.4 that

*The development potential of sites that are considered to be deliverable, developable and potentially developable is set out in table 10. These include **all of the suitable, available and achievable sites within Flood Zones 1 and 2**. As can be seen, there are not sufficient sites to meet the objectively assessed need for housing in Reading on sites in Flood Zones 1 and 2. It is therefore likely that the sequential test for sites in Flood Zone 3 would be passed. The suitability of these sites for development in terms of flooding will therefore be dependent on other policy tests, notably the Exception Test.*

- 3.4 This is translated into the draft Local Plan where the Spatial Strategy for Reading recognises in paragraph 3.2.1

'Opportunities for large-scale expansion of the town onto greenfield sites within the Borough are virtually non-existent, with the small rural areas within the boundaries subject to significant flood risk. This means a need to look within the existing urban area for opportunities, and to ensure efficient use of land. This means a need to look within the existing urban area for opportunities, and to ensure efficient use of land.'

- 3.5 Considering the evidence put forward by the Council, the need to sustain communities in Reading and the specific advice set out in Planning Practice Guidance, it is not considered sites outside flood zones 2 and 3 provide a reasonable alternative in relation to this development.
- 3.6 As appropriate development in flood zone 2, the proposal passes the Sequential Test.

4. CONCLUSION

- 4.1 A Sequential Test has been undertaken and it has not been considered reasonable to assess sites outside flood zones 2 and 3 given the existing context of the development in line with advice on individual applications held in Planning Policy Guidance.
- 4.2 The Council should assess this planning application for affordable residential development on this site positively in flooding terms, given that there are no sequentially preferable sites to help meet the housing need for the existing community.
- 4.3 The Sequential Test required by NPPF has therefore been passed.

APPENDIX 1

EXTRACT FROM ENVIRONMENT AGENCY ONLINE MAPPING

Flood map for planning

Your reference
<Unspecified>

Location (easting/northing)
472865/174712

Created
16 Nov 2018 3:20

Your selected location is in flood zone 2, an area with a medium probability of flooding.

This means:

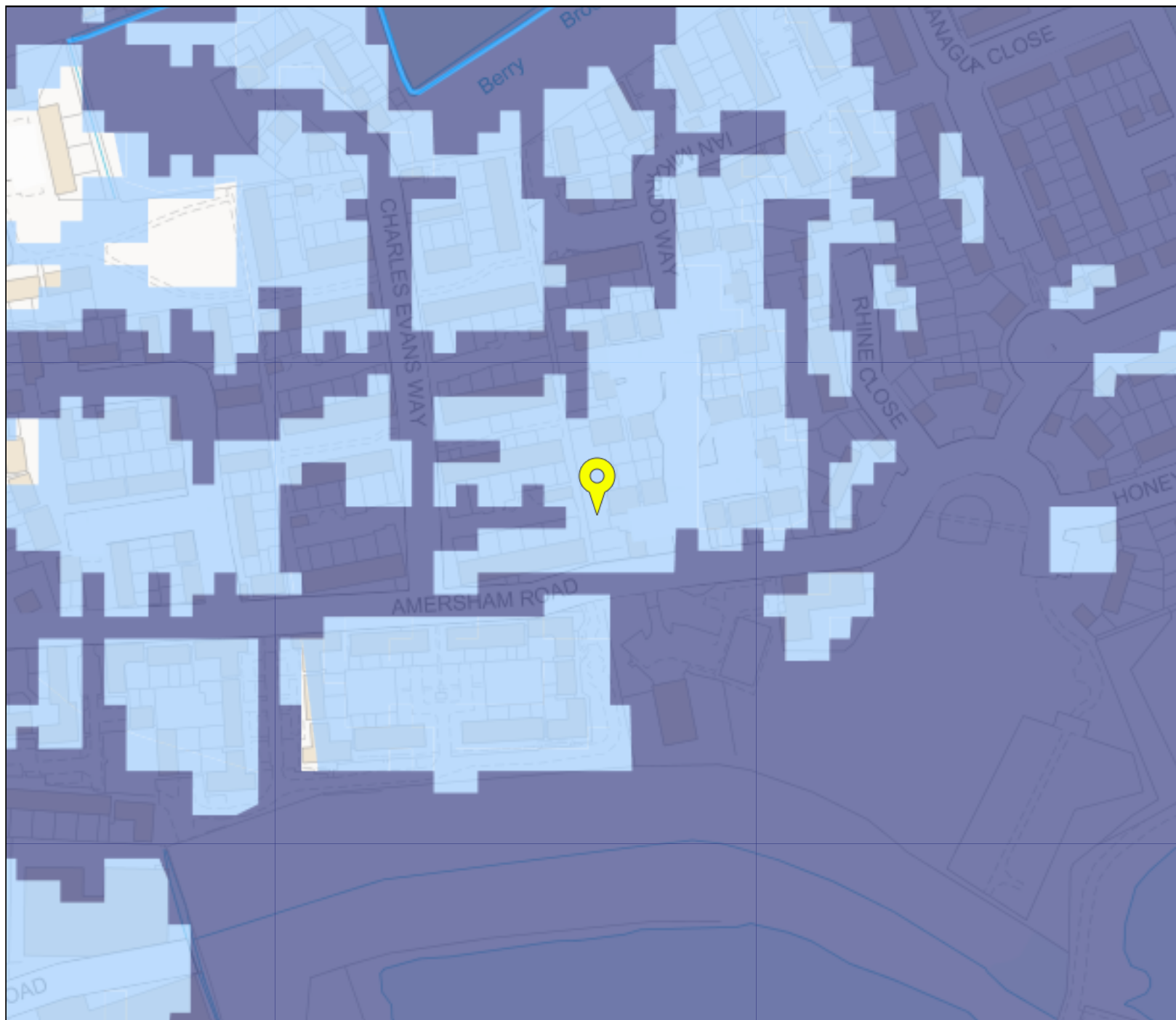
- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see www.gov.uk/guidance/flood-risk-assessment-standing-advice)

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

The Open Government Licence sets out the terms and conditions for using government data.
<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>



Flood map for planning

Your reference
<Unspecified>

Location (easting/northing)
472865/174712

Scale
1:2500

Created
16 Nov 2018 3:20

-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

0 20 40 60m

pegasusgroup.co.uk

First Floor, South Wing,
Equinox North, Great Park Road,
Almondsbury, Bristol, BS32 4QL

E Bristol@pegasusgroup.co.uk
T 01454 625 945