

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

Sequential and Exception Tests

June 2018

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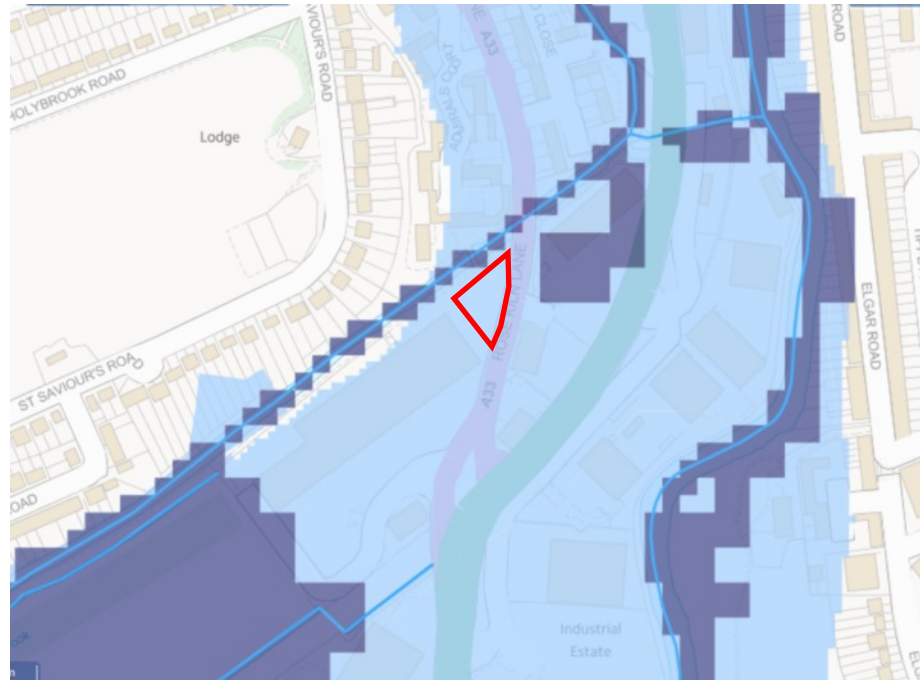
1 Introduction

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

Outline application for a drive-thru coffee shop of 186sqm 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 require some reorganisation of the car parking within the site as part of the proposals as well as the construction of a new access onto Rose Kiln Lane and a new drive-thru coffee shop facility.
- 1.4 The NPPF and NPPG 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.

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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

2 The Site and Surroundings

- 2.1 The site is located just off of the A33 on Rose Kiln Lane, which leads into Reading town centre when travelling north from the M4. There are a number of other business, retail, industrial parks on the A33, as well as new developments providing hotels, residential and retail/employment opportunities along the A33 corridor. The site's 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 eastern half set back slightly further into the plot than the western half. There are 6 retailers at the retail park; Matalan (3 units), Home Bargains, Iceland, Pound World, Magnet and Benson for Beds. Only Benson for Beds had a mezzanine floor, whilst Matalan had a 'vaulted' roof.
- 2.3 A detailed review of the site and it's surroundings is included in the Planning Statement.

Planning Context

Planning History

- 2.4 A detailed planing history for the site is set out in the supporting Planning Statement that accompanies this planning application. Recent applications are limited to extensions to the retail units and insertion of mezzanine floors.

Planning Policy Context

- 2.5 The Council's current planning policy context of relevance to this site is contained within the Core Strategy (January 2008, altered January 2015) and the Sites and Detailed Policies Document October 2012, altered January 2015). The relevant policies with regard to this Sequential Test are:

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- Policy CS25: Scale and Location of Retail, Leisure and Culture Development
 - Policy CS34: Pollution and Water Resources
 - Policy CS35: Flooding
 - SD1: Presumption in Favour of Sustainable Development
 - DM1: Adaptation to Climate Change
 - SA3: Retail, Leisure and Culture Uses in South Reading

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 101 to 103 sets out the guidance in relation the sequential and exception tests on sites at risk of flooding.

101. 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.

102. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and*
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime*
- Both elements of the test will have to be passed for development to be allocated or permitted.*

103. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and*
- development is appropriately flood resilient and resistant*

3. 3 Further guidance is set out in the National Planning Policy Guidance. In respect of Strategic Flood Risk Assessments 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 Assessment for the area provide the basis for applying the Test (Paragraph: 019 Reference ID: 7-019-20140306)

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 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 186sqm 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.
3. 8 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. 9 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. 10 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. 11 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. 12 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. 13 The findings of this sequential test are set out in the following chapter.

4 The Sequential Test - Site Analysis

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 Figures 3-5 below.

Figure 3: SFRA EA Modelled Flood Extents

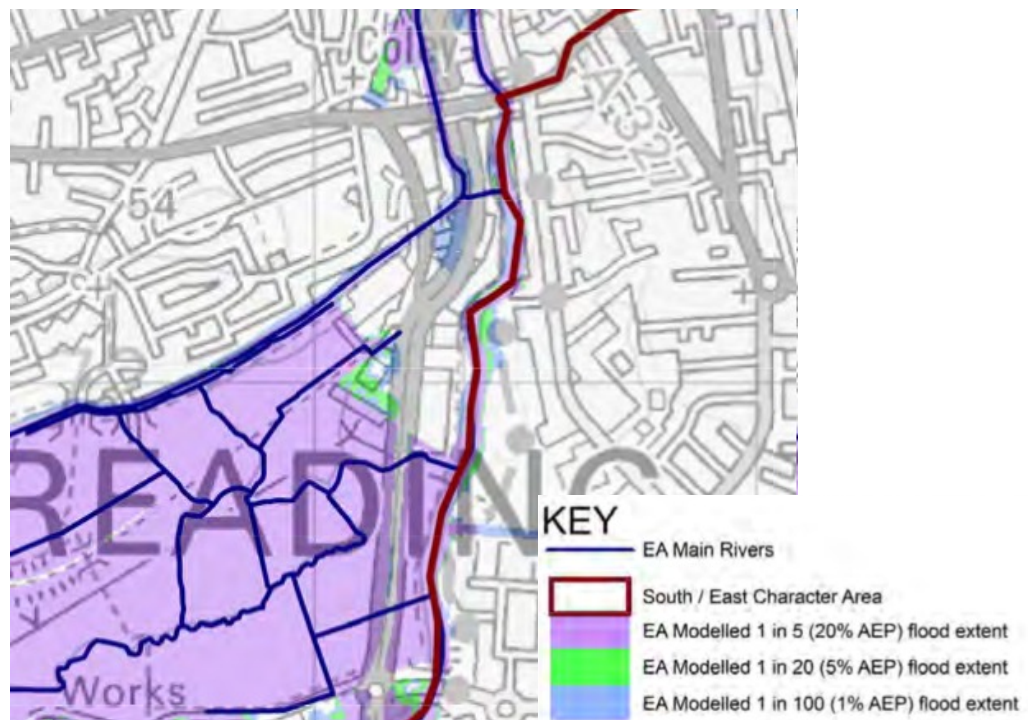


Figure 4: SFRA EA Modelled Flood Extents - Climate Change Allowances

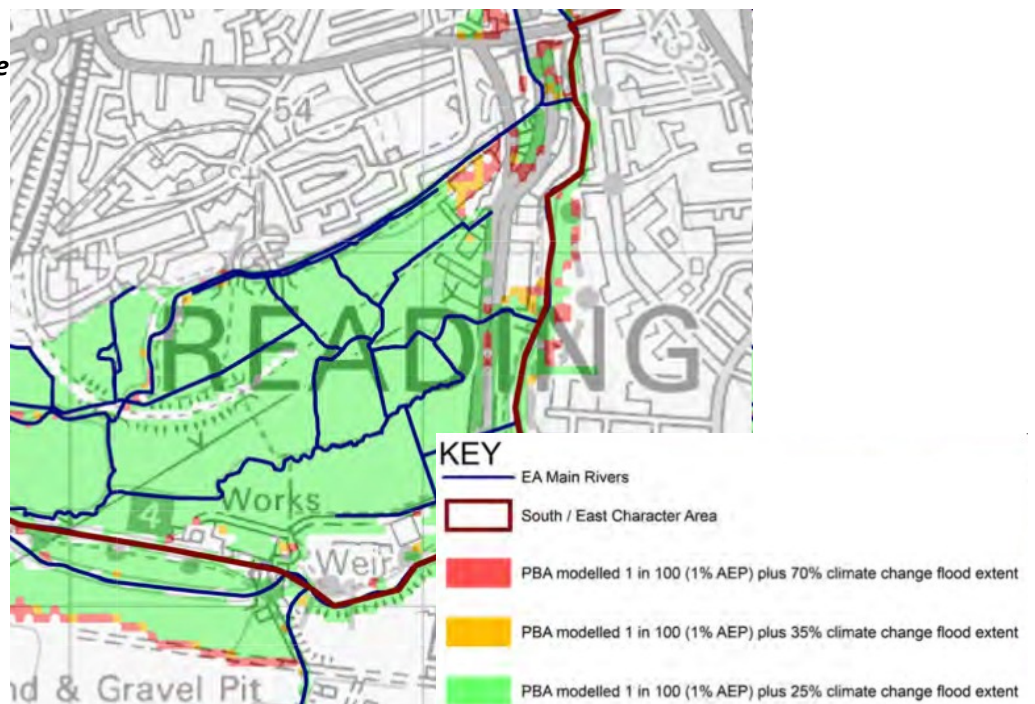
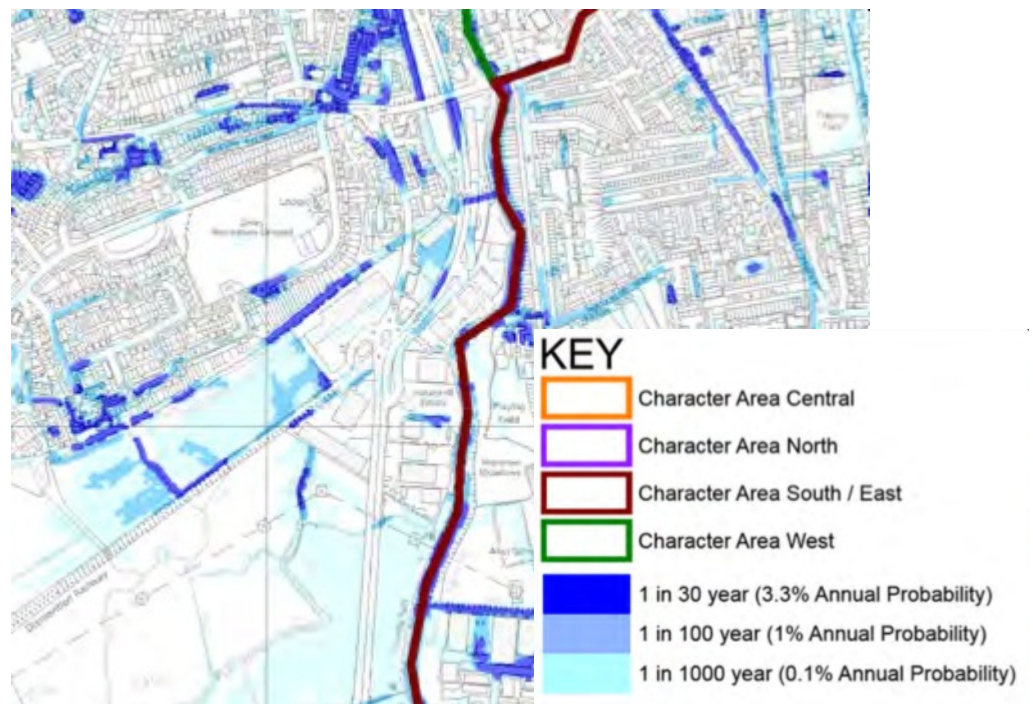


Figure 5: SFRA Flood Map for Surface Water



Site Analysis

4. 2 Table One summarises those sites that have been identified as suitable alternative sites following the methodology set out in Section 3.
4. 3 For the reasons set out in Table One the identified sites 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.

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 restaurant.
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 to enable a drive-thru restaurant.
Jacksons Corner, 1-9 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
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

	Initials	Date
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