



Land at
Queens
Road,
Caversham
RG4 8DN

Sequential and Exception Test

April 2024

Ref: 22-8957



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1. INTRODUCTION

Syntegra have been commissioned to carry out a Sequential and Exception test in accordance with the National Planning Policy Framework (NPPF) to inform a planning proposal for the proposed development involving the construction of 2 residential dwellings on land at Queens Road, Caversham, RG4 8DN.

In accordance with the NPPF this report is produced to demonstrate that the requirements of the sequential and exception test have been assessed and passed.

As such, this assessment has looked to consider potentially available, alternative sites within the local authority boundary, which are in an area with a lower probability of flooding, of a similar size to the application site and can accommodate a similar quantum of residential development to the submitted proposals.

The methodology of this sequential test has been agreed on other schemes within the borough and is therefore considered reasonable to adopt for this scheme.

2. SITE CONTEXT AND FLOOD ZONES

The site is located on a vacant parcel of land at the corner of Queens Road and Mill Road within a residential area of Caversham.



Figure 1: Site Location

Areas within the site are shown to be at a low risk of surface water flooding. The site lies entirely within Flood Zone 3 (land assessed as having a 1 in 100 year or greater annual probability of fluvial

flooding, >1%) but considered a medium risk of fluvial flooding according the EA as per Figure 3 below. The Technical Guidance to the NPPF suggests that 'More Vulnerable' land uses are appropriate within this zone, subject to passing the Exception Test.

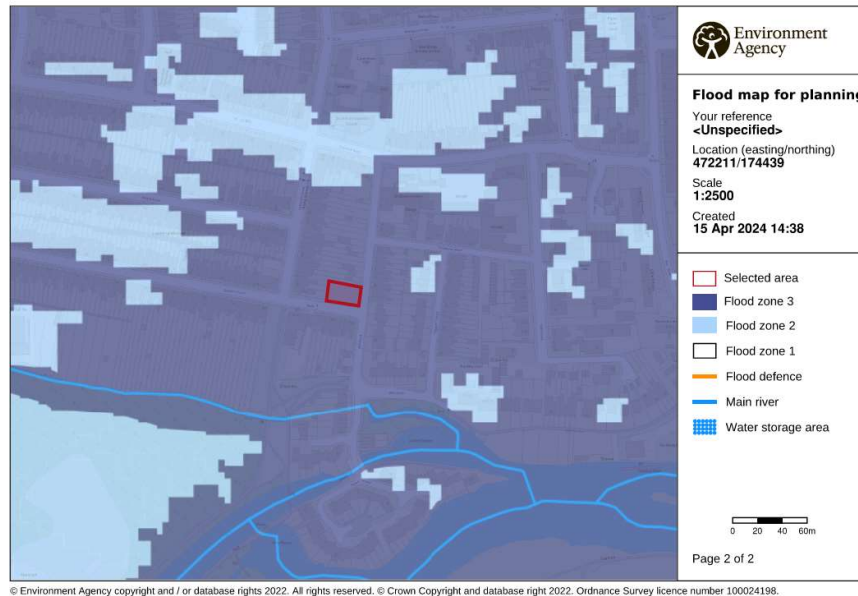


Figure 2 : EA Flood Map for Planning

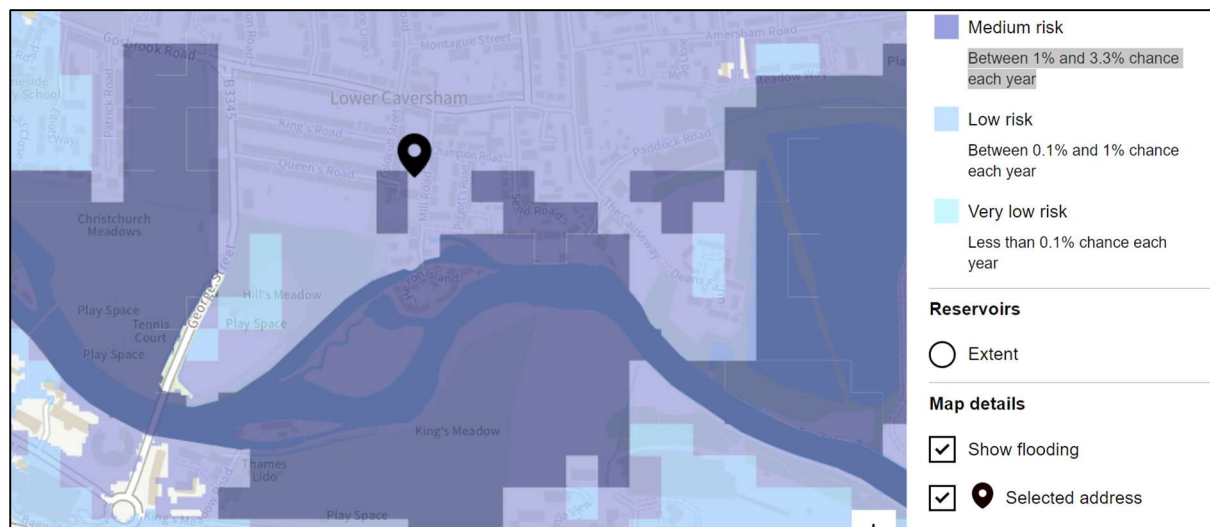


Figure 3 : EA Extent of Flooding Map

3. PLANNING POLICY CONTEXT

In undertaking the Sequential Assessment, we have reviewed the relevant national and local planning policy and guidance notes as well as specifically the below:

Reading Borough Council Strategic Flood Risk Assessment

A Strategic Flood Risk Assessment (SFRA) has been undertaken on behalf of Reading Borough Council by Jacobs Peter Brett Associates. The Level 1 Strategic Flood Risk Assessment (SFRA) updated in June 2009 and the RBC Level 2 Strategic Flood Risk Assessment (SFRA), December 2017 provide guidance on the requirements for the borough under NPPF and identify the flood risk posed to potential sites that have been allocated under the Local Plan.

Where flood risk has been identified as a possible constraint to future development, the SFRA recommends possible flood mitigation measures, including the objectives of Sustainable Drainage Systems (SuDS) that may be integrated into the design to minimise the risk to property and life should a flood incident occur.

Reading Local Plan 2019

The Reading local plan was adopted in 2019 and is produced to guide development to 2036. As the Local Plan sets to direct development 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. Wherever possible, development should be designed to reduce flood risk, both on and off site.

The local Plan states that a target of 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036 is required and that the council will continue to work to achieve the shortfall of 230 dwellings that cannot be provided within Reading over the plan period.

The Local plan goes on to say that:

“However, Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space. Provision of new housing therefore involves a heavy reliance on previously developed land, and the supply of such sites constrains the amount of housing that can be delivered in the Borough. The Council therefore needs to set targets for housing provision that are capable of being met.”

In review of the local plan it is noted that Caversham has relatively little scope for additional development compared to some other areas of Reading, as virtually the whole area is covered by residential areas with some public open space. Much of Lower Caversham is subject to flood risk constraints. There remains potential for infill development and development involving residential gardens, but this is not likely to be able to accommodate a significant proportion of Reading's identified need.

It is considered that Caversham and Emmer Green can accommodate around 700 homes between 2013 and 2036, around 5% of the total planned for however this still results in the short fall identified.

As a result of the limited development capacity, the overall strategy in this area is largely based around ensuring that, where development is to be accommodated, it is done in a way that prevents adverse effects on the existing areas. Of particular importance in Caversham and Emmer Green are potential effects on landscape, heritage and infrastructure.

Reading borough council sequential and exception test

The Reading council sequential and exception test identifies sites that are to be allocated in the local plan. As part of the assessment the study assessed sites that can provide the relevant development need firstly in flood Zone 1. As per section 4 of the report it concludes that 6929 requirements for housing would be still outstanding following these allocations and within section 4.4 it states that:

“Therefore, it is clear that, if the full needs for development are to be accommodated within Reading, use of sites within higher risk flood zones will be required”

Further reviews were then undertaken of potential sites in flood zones 2 and 3. The residential sites where considered to have passed the sequential test with the conclusions stated as:

“The development passes the sequential test for allocation for residential use, due to the fact that the identified development needs cannot be accommodated on sequentially preferable sites.”

The above statement is also therefore true of the proposed site at Queens Road and is further discussed as part of the below assessment.

4. SEQUENTIAL TEST

The aim of the Sequential Assessment is to direct development to areas with the lowest probability of flooding. The NPPF states that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

Table 3 of the Planning Practice Guidance to the NPPF sets out what uses are appropriate in Flood Zone 3. It confirms that more vulnerable uses can be appropriate in Flood Zone 3 provided that the Sequential Test and Exception Test is passed.

The first step in applying the sequential test is to determine the flood risk vulnerability of the proposed use and the Flood Zone of the site.

Table 3: Flood risk vulnerability and flood zone ‘compatibility’

Flood risk vulnerability classification (see table 2)		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood zone (see table 1)	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	✗	Exception Test required	✓
	Zone 3b functional floodplain	Exception Test required	✓	✗	✗	✗

Key: ✓ Development is appropriate.
 ✗ Development should not be permitted.

Residential uses are classified as more vulnerable. The site is located within Flood Zone 3.

The NPPF states that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower possibility of flooding. Whilst it is acknowledged that there are sites within the local plan at lower flood risk these sites are required in order to meet the councils housing demand in which there is still a significant shortfall even after allocation to higher flood zones.

In line with the Environment Agency’s standing advice note dated April 2012 and updated in February 2022, stage 3 ‘Applying the Sequential Test’ requires a comparison of the reasonably available sites identified within an appropriate study area with the application site.

Approach to the Sequential Test

Our approach to meeting the requirement of the Sequential Test includes two tasks:

- Look to identify potential alternative sites; and
- Assessing the suitability of potential alternative sites to accommodate the appropriate type and amount of proposed development.

Study Area

It is considered appropriate to only compare sites which are reasonably comparable. For a site to be an alternative to the application site there needs to be a ‘like for like’ comparison, and therefore

potential alternative sites should be of a similar size and fulfil a similar purpose to that of the proposed development.

The application site is situated within an established residential area with excellent access to public transport lines, and therefore potential alternative sites in areas with similar characteristics may be most worthy of consideration.

As detailed above, the application site is approximately 0.042ha and seeks to accommodate 2 residential units within Flood Zone 3. As such, in order to ensure that comparable sites are considered in this assessment, we have only included sites that are:

- between 0.03ha and 0.06ha;
- suitable for between 2 to 4 residential units;
- with access to amenities/transport links
- located within Flood Zone 1 or 2.

A review of the full allocations and non-allocations list has been undertaken.

Source Documents

A review of all allocation sites and also all non-allocation sites that were included in the full list of sites within the HELAA 2017, Volume II: Detailed Tables (Reading Council, 2017). The HELAA represents the most up to date source of potential housing sites in the Borough of Reading. This document as advised should form the basis for the Sequential Test.

This report centred on the potential residential sites within the Borough and through the application of the sequential test methodology sought to steer development away from areas vulnerable to flood risk.

In order to identify potential sites the Council initially prepared a list of sites with potential housing uses from which point a review of the hard constraints, current uses, information gathering, discussion with Local Representatives, Capacity Assessment and Availability of sites was carried out. This enabled the Council to discount sites not appropriate for housing development. All of these sites are required in order to assist with meeting housing demand.

The Council's HELAA (September 2017) provides the most up to date evidence of potential housing suitability and availability in the Borough.

The HELAA also includes for smaller sites within its assessment and recognises their importance in meeting the Council's rolling 5-year supply requirement.

The HELAA lists the identified sites across the Borough in Appendix 1, split between deliverable sites, developable sites, potentially developable sites and not developable sites.

Site Assessment

A desk-based assessment, from publicly available information, to consider whether any of the potential alternative sites identified are 'reasonably available' and suitable to accommodate the proposed development.

This assessment therefore includes consideration of the following:

- When is the site available for development?
- Is the site currently occupied?
- Are there multiple ownerships of the site?
- Are multiple plots of land required for development?
- Has there been any planning history?
- Is the site being pursued by other third parties?
- Are there known development constraints?

Answering these questions, as well as considering other key factors, will determine whether or not a site is a reasonably available alternative to provide the necessary amount and type of residential development when compared to the application site.

The first assessment undertaken was to discount any sites which are not physically large enough to accommodate the application proposal. The application site measures 0.04ha. It is considered to be reasonable that sites measuring less than 0.03ha could not physically accommodate the proposed development with associated parking and amenity requirements. These sites have therefore been excluded from the list.

The site is considered capable of accommodating a residential development comprising of 3 units as currently proposed. It is considered to be reasonable that all sites larger than 0.06ha would be suitable to accommodate more than 3 units . however, these sites have also been discounted on the basis that they are not reasonably comparable. Only considering sites between 0.03ha and 0.06ha is considered logical for the reasons explained and this has been accepted previously by the LPA.

An assessment has been made as to whether these remaining sites are comparable with the application site based on site area and yield. It is therefore logical to discount sites which are not comparable with the application site in this regard. Only sites defined with a proposed use for 'housing' within the HELAA have been considered for obvious reasons.

The below is a list of sites identified within Appendix 1 of the HELAA (2017) but excluding the 'Not Developable' Sites and excluding all sites which do not fall within a comparable size threshold, either too large or too small to be reasonable comparable in terms of yield.

HELAA ref	Site	Area Ha)	Assessed status
AB041	Havell House, 62-66 Queens Road	0.06	Planning permission Change of use of offices to 13 dwellings. Not reasonable alternative

AB044	Town Centre site existing building with change of use.A1:P37	0.06	Change of use, existing building to flats. Not reasonable alternative site
AB052	The Oracle Shopping Centre, Yield Hall Place	0.04	Site not available for next 15 years
AB053	27-32 Market Place	0.04	Listed building, conversion site. Not reasonable alternative
AB056	Former Gas Works Building, Gas Works Road	0.064	Change of use, existing building to flats. Not reasonable alternative site
AB061	17-23 Queen Victoria Street	0.05	Conversion of Listed Building. Not reasonable alternative site
AB066	Elite House, 179 Kings Road	0.055	Site not available for next 15 years
AB069	37-43 Blagrove Street	0.04	Site not available for next 15 years
AB094	160-163 Friar Street	0.06	Change of use of offices to 28 dwellings. Not reasonable alternative site
AB101	Part of City Wall House, 26 West Street	0.05	Site not available for next 15 years
AB102	Tangent House, 16 Forbury Road	0.05	Site not available for next 15 years
KA005	83-85 London Street	0.06	Permission in place, conversion site. Not reasonable alternative
KA007	34-36 Crown Street	0.034	Already developed with apartments not comparable
KA030	Central Club, London Street	0.05	Inner city site, change of use and conversion with archaeology and heritage constraints
KA034	9 Southern Court, South Street	0.04	Town Centre site existing building with change of use.
MI012	4 Berkeley Avenue	0.055	Site is an 2nd hand car dealership. Island site surrounded by highways; potential highways constraints. Adjacent to the A4; potential additional constraints of air quality given the shape of the site would require development to be immediately adjacent to the A4.

The resulting list of 16 potential sites was then assessed for their constraints and availability. It was found that the majority were either already being developed with the remainder shown as unsuitable for residential housing, only suitable for conversion and preferable only to flats and others incorporating multiple constraints such as listed buildings, heritage sites and sites with multiple TPOs reducing the available space available.

As a result, no local plan sites are identified as being reasonable alternatives to the proposed site and therefore it is considered that the site can pass the application of the sequential test.

Whilst no sequentially preferable sites have been identified it is important to note that many sites indicated rely on conversions of existing properties thus having an additional negative affect on availability. In addition these sites are then constrained by what is currently in place and mitigation measures such as raising finished floor levels becomes problematic and costly. Therefore even if

technically sequentially preferable sites had been identified or are in the future the demand and lack of housing supply would still see the proposed development pass the Sequential Test as sequentially preferable sites combined would still not meet housing need.

The Council's latest Housing Trajectory as published in the Annual Monitoring Review demonstrates that the Council has a greater than 5-year housing land supply and that the total supply of housing exceeds the figure for identified need and therefore sufficient land at a lower risk of flooding exists. However, a closer examination of the figures reveals that whilst the need for family housing (3 beds or more) makes up over half the identified need, the supply falls well short based on current figures. Similarly, there is a significant undersupply of affordable housing when measured against the identified need. Provision of affordable housing would also be sequentially preferable. The Site would therefore contribute to the vitality and viability of the town centre.

The sequential test should therefore pass as above as there is a need for family housing that the current and future council supply cannot meet.

Summary

Based upon the above criteria, having assessed the identified alternative comparable sites within the local area and as listed in the most up to date HELAA, it is concluded that there are no sequentially preferable sites available for the proposed development.

5. EXCEPTION TEST

Paragraph 160 of the NPPF states that, "if following 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".

The NPPF goes on to state that an Exception Test must demonstrate that the development:

- would provide wider sustainability benefits to the community that outweigh the flood risk;
- and,
- 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.

Therefore, in order to meet the requirements of the Exception Test it must be demonstrated that the development complies with parts 1 and 2 of paragraph 160.

The site is located predominantly within Flood Zone 3. The proposed development of residential use is classified as a "more vulnerable" use. Application of the Exception Test is required for residential

development proposals within Flood Zone 3; therefore, it is appropriate to apply the Exception Test in this instance.

Task 1 – Demonstration of wider sustainability benefits

The current proposals seek to redevelop an existing site for residential purposes within a predominantly residential street, in close proximity of local services, facilities and public transport. The principle of the proposed development is compliant with the overall aims of the NPPF and the Reading Borough Council Local Plan towards delivering sustainable development.

The development will provide 2 dwellings providing an important increase to housing stock within the Borough to assist with meeting the councils 5 year housing supply.

Through development many local trades and business would also see economic support. The proposed development would be a high-quality build requiring many different specialist trades, materials, equipment and provide local employment for a significant period of time.

In addition, the proposals will incorporate high quality sustainable design characteristics, together with the provision of appropriate landscaping and the use of SuDS.

- Other sustainability benefits of the proposals include;
- Zero carbon development;
- Construction materials will have a low environmental impact as described in the BRE Green Guide;
- Energy and water efficiency measures through meeting Building Regulations M4(2) and M4(3);
- Ecological enhancements through a comprehensive landscaping strategy;

Task 2 – Demonstration the development will be safe

A site-specific Flood Risk Assessment shall be prepared as part of the planning application. As above the site is within flood zone 3 and indicated as medium risk (see figure 3). The proposed buildings would be constructed taking into account flood mitigation measures and therefore provide a suitable level of protection to residents.

Finished floor levels will be set above the peak flood levels as agreed with the Environment Agency and an appropriate flood warning and evacuation plan will be put in place for residents. A place of refuge shall be provided.

Sustainable drainage techniques shall be implemented to further reduce flood risk on and off site providing greater benefits to the wider area as part of the development.

The flood risk associated with the proposed development is therefore considered to be manageable with the development unlikely to increase existing or future risk to residents. The exception test

demonstrates that collectively there are clear sustainability benefits to the community as a result of the proposed development.

6. CONCLUSION

This flood risk Sequential Test and Exception Test have been undertaken by Syntegra relating to proposed residential development at Land at Queens Road , Caversham.

The assessment has demonstrated that the scheme could pass the sequential test given that the proposals cannot be accommodated on other sequentially preferable sites and the Local Plans needs require for sites in flood zone 2 & 3 to be developed to assist with meeting the housing shortfall.

On this basis, it can be demonstrated the Sequential Test has been satisfied insofar that any alternative sites are not currently reasonably available.

Table 3 of the Technical Guidance to the NPPF suggests that residential dwellings (as categorised within Table 2 of the Technical Guidance to the NPPF) are appropriate within Flood Zone 3, subject to passing the Exception Test.

The Exception Test demonstrated that the proposed development would provide wider sustainability benefits to the borough and that the development will be safe for its lifetime without increasing flood risk elsewhere through the undertaking of a Flood Risk Assessment and appropriate mitigation measures to reduce risk to occupants and the locality. On this basis, the Exception Test has been satisfied and the development is considered appropriate in accordance with the NPPF.

