

FLOOD RISK SEQUENTIAL TEST

**PLOT ON THE WARREN
CAVERSHAM
READING
RG4 7TH**

Redevelopment of site to provide single detached dwelling (self build)

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1. INTRODUCTION

- 1.1 This report provides a flood risk sequential test for alternative sites to that being proposed by a planning application for the erection of a single detached dwelling at The Warren, Caversham, RG4 7TH. The requirement for this test has arisen as the application site falls within Flood Zones 2 and 3a which under the National Planning Policy Framework is defined as having a 'medium probability of flooding.' In accordance with NPPF (para.174), new development should be steered towards areas with the lowest risk of flooding through the application of a sequential test. Development should not be permitted if there *are 'reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding'*.
- 1.2 The Planning Practice Guidance provides further advice and also states that the overall aim is to steer development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, account should be taken of the flood risk vulnerability of land uses and consideration should be given to reasonably available sites in Flood Zone 2, applying the Exception Test if required.
- 1.3 In view of the requirements of the NPPF, the application site is assessed against other available alternative sites which would be suitable for the proposed development within Flood Zones 1 and 2. The PPG has been recently updated and now states that larger and/or multiple smaller sites could also be considered as reasonable alternatives, although sites could still be considered unsuitable if they do not provide a similar density of development.

2 DEFINING THE EVIDENCE BASE (STAGE 2)

State the geographical area over which the test is to be applied: The test has been applied over the whole of the Local Authority area.

Identify the source of reasonably available sites: In accordance with the Council's housing evidence base (i.e. that which informs the latest Local Plan), this has been acknowledged to be the latest version of the Reading Housing and Economic Land Availability Assessment RHELAA November 2024) The site is not covered by a 'made' Neighbourhood Plan. Other documents assessed include the Brownfield Land Register (December 2024) which has also been assessed in accordance with the Council recommendations.

The applicant has undertaken a land search with local agents and this has not identified any single plots within Reading BC area which are currently for sale with a lower risk of flooding. A summary of these sites is provided below.

State the method used for comparing flood risk between sites, either:

- **Environment Agency Flood Map, or**
- **An up to date Strategic Flood Risk Assessment held by the Local Planning Authority, or**
- **Site specific Flood Risk Assessments where they are suitable for this purpose, or**
- **Another map or sources of flooding information not listed (state which).**

The method used for comparing flood risk between sites is the Environment Agency Flood Map.

3 APPLYING THE SEQUENTIAL TEST (STAGE 3)

RHLAA (2024)

State the name and location of the reasonably available site options being compared to the application site:

After a thorough and robust assessment of all of the sites of the 2024 RHLAA, all of the sites have been discounted at this stage either because they are not reasonably available; are either too large or too small; have a capacity that is either too large or too small and which would not be acceptable on the grounds of the proposed density; the sites are of an appropriate size but have an extant planning permission for an alternative use; or the site comprises of a listed building with no planning permission in place. The sites are identified by their Site Code number:

Not reasonably available or deliverable (i.e. projected timeframe): AB001, AB002, ABO03, AB013, AB021, AB022, AB024, AB028, AB029, AB038, AB045, AB048, AB059, AB060, AB062, AB079, AB085, AB095, BA007, CA003, CA004, CA005, CA006, CA007, CA009, CO003, CO006, CO007, CO008, CO015, CO016, CO017, KA013, KA014, KA017, KA033, KA044, KE007, KE008, KE018, NO004, NO005, NO010, PA006, PA007, RE011, RE017, RE018, RE020, SO005, SO007, TH017, TH049, TH050, TH051, TH052, TH063, TI003, TI007, WH008, WH014, WH019, WH023, WH033, WH050, WH051, WH053.

Site is either too large or too small: AB007, AB016, AB040, AB050, AB091, AB101, CO001, CO018, KE005, KE011, KE012, RE006, SO006, SO013, TH030, TH034, TH061, TI008, WH012, WH049, WH052.

Estimated capacity too large or too small: AB010, AB015, AB019, AB020, AB023, AB027, AB030, AB034, AB046, AB047, AB049, AB052, AB054, AB078, BA003, BA024, .CO002, CO004, KA003, KA012, KA015, KA016, KA036, KA037, KA042, KA043, KA048, KE004, NO006, PA001, PA003, PA004, RE010, RE013, SO010, TH020, TH062, WH018.

Site is either too large or too small and estimated capacity too large or too small:

AB026, AB031, AB033, AB053, AB055, AB057, AB076, AB102, BA001, BA025, CH001, CH007, CU001, EG001, EG002, EG003, EG004, EG005, EG006, KA002, KA005, KA006, KA007, KA090, KA010, KA038, KA040, NO001, NO002, NO009, PA008, RE001, RE002, RE003, RE004, RE007, RE019, SO001, SO002, SO003, SO009, TH001, TH004, TH005, TH006, TH013, TH015, TH019, TH022, TH026, TH031, WH015.

Not reasonably available or deliverable (i.e. projected timeframe) /and Site is either too large or too small:

AB004, AB005, AB006, AB009, AB012, AB017, AB018, AB025, AB032, AB035, AB036, AB037, AB039, AB041, AB042, AB043, AB044, AB056, AB058, AB061, AB063, AB064, AB065, AB066, AB067, AB068, AB069, AB070, AB071, AB073, AB074, AB075, AB077, AB080, AB081, AB082, AB083, AB084, AB087, AB088, AB089, AB090, AB096, AB097, AB098, AB099, AB100, AB103, BA002, BA004, BA005, BA006, BA008, BA009, BA010, BA011, BA012, BA013, BA014, BA015, BA016, BA017, BA018, BA019, BA020, BA023, BA023, CA002, CH002, CH003, CH004, CH005, CH006, CH008, CH010, CH011, CU002, CO009, CO010, CO011, CO012, CO013, CO014, EG007, EG008, EG009, EG010, KA004, KA008, KA011, KA018, KA019, KA020, KA021, KA022, KA023, KA024, KA025, KA026, KA027, KA028, KA029, KA030, KA031, KA032, KA034, KA039, KA041, KA045, KA046, KA047, KE001, KE002, KE003, KE006, KE009, KE010, KE013, KE014, KE015, KE016, KE017, NO003, NO007, NO008, NO011, PA005, RE005, RE008, RE009, RE012, RE014, RE015, SO004, SO008, SO011, SO012, TH002, TH003, TH007, TH008, TH009, TH010, TH011, TH012, TH014, TH016, TH018, TH021, TH023, TH024, TH027, TH028, TH029, TH032, TH033, TH035, TH036, TH037, TH038, TH039, TH040, TH041, TH042, TH043, TH044, TH045, TH046, TH047, TH048, TH053, TH054, TH055, TH056, TH057, TH058, TH059, TI001, TI002, TI004, TI005, WH001, WH002, WH003, WH004, WH005, WH006, WH007, WH009, WH010, WH011, WH013, WH016, WH017, WH020, WH021, WH022, WH024, WH025, WH026, WH027, WH028, WH029, WH030, WH031, WH032, WH034, WH035, WH036, WH037, WH038, WH039, WH040, WH041, WH042, WH043, WH044, WH045, WH046, WH047, WH048.

The sites are of an appropriate size but have planning permission for an alternative use: AB093 (Planning permission and Listed Building Consent for a hotel under PL/22/1233); AB094 (Planning permission for a 7 storey hotel under PL/22/1235).

The site comprises of a listed building with no planning permission in place: AB072.

Indicate whether flood risk on the reasonably available options is higher or lower than the application site:

Given the evidence gathered above there are no sites which are reasonably available to assess the application site against.

State whether the reasonably available options being considered are allocated within the Local Plan:

Not applicable.

State the approximate capacity of each reasonably available site being considered:

Not applicable as there are no reasonably available sites.

Detail any constraints to the delivery of identified reasonably available options; for example, availability within a given time period or lack of appropriate infrastructure:

Not applicable as there are no reasonably available sites.

Brownfield Land Register December 2024

The following site code numbers were considered to be of a comparable size (0.1-0.16Ha): BL1005, BL1009, BL1015, BL1034a, BL1038, BL1043, BL1044, BL1046a, BL1058, BL1061, BL2002, BL2015, BL2031, BL2034, BL2037, BL2040, BL2058, BL2060, BL3001, BL3011, BL3015, BL3033, BL4029, BL5001, BL5017.

Of these sites, the following do not have planning permission and have therefore been discounted: BL1009, BL1043, BL1044, BL1058, BL2002, BL2015, BL2031, BL2037, BL3001, BL3015.

The following have permission but have been discounted as the estimated capacity is substantially too large and the proposal would not be able to provide a similar density: BL1005, BL1015, BL1034a, BL1038, BL1046a, BL1061, BL2034, BL2040, BL2058, BL2060, BL3011, BL3033, BL4029, BL5001, BL5017.

SEQUENTIAL TEST CONCLUSION

Are there any reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed?

The conclusion is that there are no reasonably available sites with a lower probability of flooding that would be appropriate to the type of development proposed. All of the sites assessed are unsuitable on the following grounds:

- They are not reasonably available/not developable within the next 15 years
- The sites are either too large or too small
- The capacity of the sites are either too large or too small and the proposal would not be acceptable on density grounds
- The site is of an appropriate size but has an extent planning permission for an alternative use
- The site comprises of a listed building with no planning permission in place for residential re-use

As a result of the findings, there is no additional requirement to assess whether any of the sites are sequentially more preferable than the application site.

In addition, the applicant has undertaken a search with local agents and this revealed that the following sites are currently available but considered for the reasons set out to either be unavailable or inappropriate for the use/number of dwellings proposed:

Oxford Road, Reading RG30 (Lansley) – Site comprises of a Grade II listed building without planning permission for residential use. Discounted.

Perimeter Road, Reading RG5 (Barney Estates and Auctioneers) – The plot comprises of two heavily treed plots with no planning permission for residential use. Discounted.

Upper Warren Avenue, Caversham, Reading RG4 (Parkers) – Comprises of a recreational plot of land without planning permission for residential use. Discounted.

40-68 Silver Street, Reading – Resolution to grant permission for 23 flats under ref.201766/FUL. Construction of a single dwelling would not reflect the density of this central Reading site which is also brownfield/previously developed. Discounted.

The application site and the proposal itself passes the sequential test.