

SEQUENTIAL TEST

**Erection of nine dwellings following
demolition of two existing dwellings
and outbuildings, with associated
access and landscaping**

**Athol Villa, Westbourne Road, College
Town, Sandhurst, Berkshire, GU47 0QX**

On Behalf of: Rio Homes

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1. Disclaimer

The findings presented in this report are based on a desktop study of information supplied by third parties. The purpose of this report is to provide Bracknell Forest Council with an opinion on the suitability in flood risk and planning terms of the subject site at Athol Villa, Westbourne Road compared with other available sites in the council area.

This document has been prepared for this specific reason and should not be used for any other purpose without the prior written authority of ET Planning. Whilst we assume that all information is representative of past and present conditions, we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

2. Executive Summary

A sequential test is required for this site as the proposal is not considered a minor development in flood risk terms, part of the development is located in Flood Zone 2 and a sequential test hasn't already been carried out for a Housing development at this site.

This Sequential Test has been produced in response to comments received from Bracknell Forest Council, in line with Bracknell Forest Council Strategic Housing and Economic Land Availability Assessment (SHELAA), Site Allocations Local Plan, Planning Commitments for Housing at March 2021, and using data included within Flood Risk Assessment carried out by GeoSmart, reference 72797R1 and with consideration of national / local planning policy and guidance.

A Sequential Test undertaken for the search area, covering the entire borough of Bracknell, indicates there are no suitable Sites which could accommodate the same number and type of units as the proposed development location, which are at lower risk than the Site and which are considered to be available, deliverable and developable.

There are multiple potential development locations, which are at a lower flood risk than the subject Site, however, these are not deemed suitable for a variety of reasons, which are discussed in more detail at section 5.

3. Policy Background

National Planning Policy

National Planning Policy Framework (NPPF) paragraph 157 promotes a sequential, risk-based approach to the location of development. Paragraph 158 explains that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. It states that 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.

National Planning Guidance

National Planning Policy Guidance (NPPG) provides detailed guidance on when a sequential test is required. This states that if the site is located within flood zones 2 or 3 and a sequential test has not previously been carried out in relation to the same form of development, then a sequential test is required.

In terms of the search area that needs to be applied when looking for alternative sites for the development, this should be agreed with the local authority. The guidance also provides an indication of which sources to use when looking for alternative sites:

First, check your adopted or draft local plan for sites that have already been allocated for development and could be suitable for the development you're proposing.

Also look at sites that haven't been allocated in the local plan, but that have been granted planning permission for a development that's the same or similar to the development you're proposing. Your local planning authority will have details of sites with planning permission.

Finally, check with your local planning authority whether there are any 'windfall sites' in your search area. Windfall sites are sites that aren't allocated in the local plan and don't have planning permission, but that could be available for development.

The guidance further states that a check should be carried out regarding the approximate capacity of each potential alternative site and if the local planning authority has a density policy then this should be taken into account when estimating capacity. If the local planning authority doesn't have a density policy, then the average density at which houses have been built in the area should be considered. This check should then be used to assess whether the sites are in fact similar to the subject site and any that are not can be disregarded.

Local Planning Policy & Status

The Development Plan for Bracknell Forest Council consists of the Core Strategy adopted in 2008, the Site Allocations Local Plan adopted 2013 and the Bracknell Forest Borough Local Plan 2002. The consultation on the Pre-submission Bracknell Forest Local Plan has now closed. Once adopted, it will provide the strategy for the growth of the borough up to 2037.

Bracknell Forest Council does not have a specific flood risk policy and therefore relies on the NPPF guidance in this regard.

Bracknell Forest Council Level 1 Strategic Flood Risk Assessment (JBA Consulting, 2018) identifies 29 culverts in Bracknell Forest. Eleven are within the main urban area of Bracknell. There are many more small culverts that have not been identified on asset registers. Most of the registered culverts in Bracknell. are owned and maintained by the Council, whilst a few are owned by the Highways Agency and private owners. The Council indicated that there was no history of these culverts being exceeded as determined by the flood incident data received.

Finished Floor Levels (FFL) are usually recommended in line with the Environment Agency's Guidance on Flood Risk, which requires a minimum FFL of 300mm above the modelled 1 in 100-year (1%) AEP fluvial water level with allowance for climate change.

4. Site Description and Proposal

The site is located on the North side of Westbourne Road in Sandhurst. A small proportion of the site is located in Flood Zone 2.

The development proposed is for the construction of 9no. dwellings on a site of 0.23 hectares resulting in a density of 39dph.

A Flood Risk Assessment (FRA) (reference 72797R1) was produced for the Site and the proposed development to assess flood risk from all sources and this states that the risk from flooding could be mitigated by setting the Finished Floor Levels (FFL) of unit 8 and 9 in the northern area of the Site to at least 63.09mAOD. The FFL's of Unit 1, 2, 3 and 4 in the southern area of the Site should be set to at least 62.73mAOD.

The general ground levels on the Site are between 62.06mAOD in the far north western area and 63.04mAOD along the far north eastern boundary, with the site falling very gradually in a westerly direction. This is based upon a Site-specific topographic survey undertaken by Landarb Solutions in 2019.

A Flood Risk Rebuttal Statement (reference 72797RS1) was also produced to review comments received from the Environment Agency (EA) and Bracknell Forest Council, who are the Lead Local Flood Authority (LLFA), in relation to the proposed development for the planning application and supporting Flood Risk Assessment.

It is noted that the proposed buildings are located at least 12m from the York Town Road Ditch, exceeding the EA's requirement for an 8m buffer in relation to ecological requirements. In addition, a similar nearby application was approved for 60 College Road, (planning ref: 15/00718/FUL). This site is located immediately adjacent to the north of the Site and used similar methodology for their FRA which was approved. The flood levels calculated as part of the FRA produced for Athol Villa were actually higher than those calculated for 60 College Road and so the assessment of flooding and mitigation recommended as part of the assessment is considered to provide more of a precautionary approach. The FRA for 60 College Road confirms the ground floor level should be 450mm above local ground level. The FRA for Athol Villa (the Site) placed a recommendation to raise FFL's 300mm above the climate change flood level, which is similar, if not more of a precautionary approach.

5. Sequential Test

The Sequential Test should be applied to demonstrate that there are no 'reasonably available sites' in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.

A development proposal will only fail to pass the Sequential Test if alternative sites are identified within the search area that are at lower risk of flooding, would be appropriate for the proposed development and are 'reasonably available' for development. A site is only considered to be 'reasonably available' if it is both 'deliverable' and 'developable' as defined by the NPPF:

Deliverable- To be considered deliverable, sites for housing 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. In particular:

- a.) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b.) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable - To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

A thorough review of a range of publicly available documents including the Site Allocations Local Plan, the local authority SHELAA, Authority Monitoring Report, Planning Commitments for Housing, and the Strategic Flood Risk Assessment has been conducted to establish a list of sites which are considered to be 'reasonably available' and appropriate for the proposed development.

This sequential test reviews 123 sites overall, 25 of which are allocated sites within the Local Plan (11 of which are sites proposed for housing on previous developed land within defined settlements, 6 are sites proposed for housing on other land within defined settlements, and 8 are sites proposed for housing on the edge of settlements). 89 sites were taken from the SHLAA. The remaining 9 sites are medium sites (sites of less than 1 hectare but with 5 (net) or more dwellings) covered by hard commitments where planning permissions have been granted, but construction has not started, and are taken from the Planning Commitment for Housing March 2021.

A further land research was undertaken using search engines such as Zoopla and Rightmove, but no sites were available. (Appendix 1 -Sheet 1)

Of the 123no. sites, 13no. of these sites can be instantly removed from consideration due to having worse flood characteristics than the subject sites. Considering the proposal being 9no. dwellings on a site of 0.23 hectares with a density of 39dph, sites with unsuitable estimated capacity (more than 25 units or 60dph, or less than 5 units or 20dph) have been removed as well. This results in the removal of 66no. sites. A further 13 no. sites have been removed where the planning permissions have been expired (3 years from the date of the decision), or construction has started or indeed completed. (Appendix 1 -Sheet 2)

For the remaining 31no. sites, 20 of which are located outside of a defined settlement and thus are not as sustainable as the subject site. The suitability of remaining sites is discussed below: (Appendix 1 - Sheet 3)

Allocated Sites

Land at Battle Bridge House, and Garage, Forest Road, Warfield, RG12 1RB

- Identified for 10 (net) dwellings based on 40dph.
- within Northern Villages Area A of the Character Area Assessment Supplementary Planning Document

This site was allocated in 2013 and it is not clear whether this site remains available for development. In any case, it is noted that the appropriate ecological surveys had not been carried out at the time of its inclusion in the SHLAA and thus it is not apparent as to whether it would be suitable for the development of the number of dwellings stated. In addition, no transport statement or report on land contamination had been carried out, it is therefore not clear whether this site would indeed be available or suitable for residential development.

Land at Wood Lane, Binfield, RG42 4EX

- Identified for 20 (net) dwellings based on 35dph
- This is a greenfield site which would bring about greater risk for surface flooding once developed than the subject site. In addition, there are a number of features such as important trees within the site to be retained. It is therefore questionable whether this site is indeed suitable for development and is certainly not considered locational preferable than the subject site.

White Cairn, Dukes Ride, Crowthorne, RG45 6DP

- Identified for 16 (net) dwellings based on 35dph
- There are a number of factors which would need to be investigated further (such as the setting of Listed Buildings within the College grounds) and features (such as important trees and additional planting along existing boundaries), to be retained to preserve the landscape setting and provide visual mitigation. It is therefore, not immediately clear as to whether this site would be suitable or available for the quantum of development proposed or indeed whether it's inherent constraints would make this site less sequentially preferable in planning terms.

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SHLAA Sites

None remained

Sites with Planning Permission

Land at East Lodge, Great Hollands Road,

- The site has been granted for the erection of a 3-storey block of 9 flats comprising of 3 x no.1 bedroom flats and 6 x no.2 bedroom flats together with associated parking and landscaping on 06th November 2019 (Planning ref: 17/00582/FUL).
- The proposed development in this site is for flats, which is how the required density can be achieved. The proposed development of family housing in this location would not be possible and thus it is not considered suitable for the subject proposal.

Clifton House, Brants Bridge, RG12 9BG

- The site has been granted for the addition of two storeys to accommodate 14no. residential apartments, following demolition of existing roof on 16th October 2020 (Planning ref: 17/00700/FUL).
- The proposed development in this site is for additional storeys on existing building, and there is no available land. As such, the site is not suitable for the proposed development.

Forth House, Brants Bridge, RG12 9BG

- The site has been granted for external alterations and erection of a roof extension comprising a second floor of residential accommodation consisting of 9no. 1 bed flats on 16th October 2020 (Planning ref: 17/00768/FUL).
- As above, the proposed development at this site is for a roof extension to create additional flats, and there is no available land. As such, it would be unsuitable for the erection of houses.

Tamer House, Brants Bridge, RG12 9TE

- The site has been granted for raising of roof to create a new second floor comprising of 9no. 1 bed flats on 16th October 2021 (Planning ref: 18/00793/FUL).
- Similarly, to the above approvals, this scheme utilises the air space above an existing development and is not comparable to the subject development. The proposed scheme would not be possible in this location.

Block A, B and C Christine Ingram Gardens, RG42 2LX

- The site has been granted for the creation of six additional apartments following the internal reconfiguration of 4no. existing apartments in Blocks A,B and C, and utilisation of existing roof space in Block A, installation of dormer windows and alterations to parking layout on 8th February 2021 (Planning ref: 18/00620/FUL).
- The proposed development on this site is based on internal reconfiguration and upwards extension and there is very limited land available, therefore , as with the other approvals identified above, the site would not be suitable for the proposed development.

North Lodge Farm Forest Road Hayley Green, RG42 6DD

- The site has been granted for the residential development of 19 no. dwellings (including affordable housing) including associated access, open space and landscaping following demolition of existing buildings, structures and hardstanding on 11th April 2019 (Planning ref: 17/00656/OUT).
- The site is in vicinity Hayley Green Wood, a National Nature Reserves in England. There are a number of factors which would need to be investigated further, and therefore questionable whether this site is indeed suitable for development.

Orchard House, Priory Road, SL5 8EB

- The site has been granted for the erection of 6no. 2 bed apartments following demolition of existing dwelling with associated parking, landscaping and entrance gates on 12th December 2018 (Planning ref: 18/00203/FUL)
- Part of the site is located on an undeveloped greenfield site, which would bring about greater risk for surface flooding once developed than the subject site.

Moat Farm, Winkfield Lane, SL4 4SR

- This site has been granted for the erection of 12 dwellings with parking, access, and landscaping following demolition of existing buildings on 28th September 2020 (Planning ref: 19/00343/FUL).
- Part of the site is located in the undeveloped greenfield site, which would bring about greater risk for surface flooding once developed than the subject site.

6. Conclusion

The application proposes 9 additional dwellings on a 0.23 ha site within Flood Zone 2. Of the available sites identified above only 11 are considered comparable in terms of risk of flooding and capacity to deliver the proposed development. Of these sites the Sequential Test has shown that none of these sites have a lower risk of flooding, are readily available, developable and deliverable and thus could accommodate the proposed development.

Given the requirements of the NPPF are to apply a “pragmatic approach” on the availability of alternatives when undertaking the Sequential Test it is considered that the sequential test is passes as there are no other suitable sites which could reasonably be argued to be better placed to accommodate the development proposed.

7. Appendix 1: Site Review Document