



Land North of Sturt Avenue, Haslemere

Flood Risk Sequential Test

November 2023

LUKEN  **BECK**

Management | Development | Planning

Contents

| | | |
|----|---|----|
| 1. | INTRODUCTION | 1 |
| 2. | THE SITE & PROPOSED DEVELOPMENT | 5 |
| 3. | SEQUENTIAL TEST APPROACH | 6 |
| | Application of the Sequential Test | 6 |
| | Planning Policy | 10 |
| 4. | ASSESSMENT OF ALTERNATIVE AVAILABLE SITES | 10 |
| 5. | FURTHER ASSESSMENT | 13 |
| 6. | CONCLUSIONS | 14 |

Appendices

| | | |
|--|---|----|
| | APPENDIX 1: MAPS FROM CHICHESTER DISTRICT COUNCIL HELAA (2021) | 15 |
| | APPENDIX 2: MAPS FROM WAVERLEY BOROUGH COUNCIL LAA (NOVEMBER 2020) | 16 |
| | APPENDIX 3: MAPS FROM CHICHESTER DISTRICT LEVEL 1 SFRA (DECEMBER 2022) | 17 |
| | APPENDIX 4: RIGHTMOVE.CO.UK SEARCH RESULTS (29 TH NOVEMBER 2023) | 18 |

1. INTRODUCTION

- 1.1 This sequential test has been prepared by Luken Beck in support of a planning application seeking full consent for the development of land north of Sturt Avenue, Haslemere with 9 residential dwellings associated access, infrastructure, parking and landscaping (site location identified outlined red in Figure 1).



Figure 1: Site Location Plan

- 1.2 The current proposals follow a previous similar scheme that was refused planning permission by Chichester District Council and subsequently dismissed at appeal, partly due to the lack of a flood risk sequential test (ref: LM/21/02428/FUL / APP/L3815/W/22/3298478). Although the site is principally located within Flood Zone 1 (low risk) where the sequential test is not required, a small part of the site area falls within Flood Zones 2 and 3 and as such a sequential test is required. The site location plan for the application site has now been updated to remove the area of Flood Zones 2 and 3 other than that affecting the site access. By virtue of the separate consent for the site access, with its associated mitigation (bridge) then the application site might now be considered as if falling wholly within Flood Zone 1.
- 1.3 This sequential test has been prepared in response to the comments of the planning inspector and in carrying out this test regard has been given to the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) and the guidance provided by the Environment Agency in their document 'Demonstrating the flood risk Sequential Test for Planning Applications'.

- 1.4 In this report we set out the reasoned methodology, having regard to the characteristics of the application site, local and national planning policy, the Planning Practice Guidance and related information. A review is provided of reasonably available sites within a suitable area at a lower flood risk based on information available from multiple sources, including the Council's latest land availability appraisal, a review of land with planning permission for residential development, and other land currently commercially available.
- 1.5 Ultimately a conclusion is reached on whether there are sequentially preferable alternatives to the application site having regard to the wider context of the need for development, as if there is no need for housing sites then development will not be "necessary in such areas"¹. Conversely, if there is a need for development, and that need cannot be met by sequentially preferable sites then the development of this site will be appropriate.

Applying this Sequential Test

- 1.6 The purpose of applying the sequential test is solely to consider the availability of alternative sites for the development as part of the examination of flood risk. This document therefore complements the appraisal within the Site Specific Flood Risk Assessment (SSFRA) submitted with this application but is a standalone sequential appraisal concerned with the identification of sites at a lower 'risk' of flooding than the application site.
- 1.7 NPPF (2023) seeks to avoid inappropriate development in areas at risk of flooding (paragraph 159) and that a sequential risk-based approach should be applied to the location of development in order to avoid, where possible, flood risk to people and property (paragraph 161).
- 1.8 The following key parts of the NPPF should be noted carefully in this case. Paragraphs 162, 163 and 164 of the NPPF sets out that:

"162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. 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"

"163. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3."

¹ Per NPPF Paragraph 159

"164. The application of the exception test should be informed by a strategic or site specific flood risk assessment.."

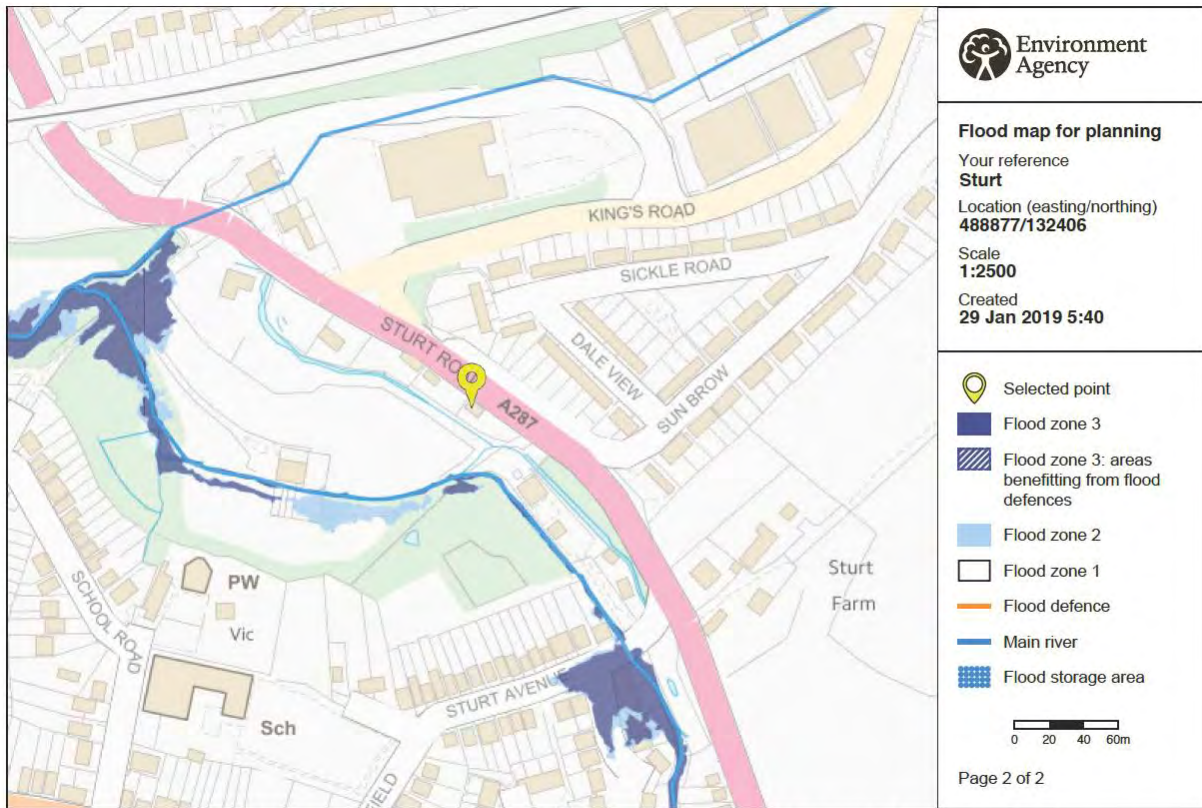
- 1.9 The aims and objectives of the NPPF are replicated in the PPG, with this setting out that *"avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features"* and that *"application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so.."*(Paragraph: 023 Reference ID: 7-023-20220825).

The Application Site

- 1.10 As set out above, the application site is principally located within Flood Zone 1, however a small part of the site area towards the north-eastern corner is located within Flood Zones 2 and 3, as identified on Environment Agency flood risk mapping (see Figure 2). The majority of the site is presently within Flood Zone 1. Areas of Sturt Avenue and land to its south are also within Flood Zone 3. The latest SFRA² shows this remains unchanged in future predicted climate change scenarios.
- 1.11 The development proposals demonstrate avoidance of any areas at risk (i.e. that are not in Flood Zone 1, save for the access, for which mitigation is provided in the form of a new bridged entry. Moreover, the access strategy avoids the areas of Sturt Avenue that are subject to flood risk now and in future. For these reasons, and the purposes of assessing sequential risk, the 'site' is essentially Flood Zone 1. Insofar as selecting alternative sites, it would not be relevant to review other sites in Flood Zone 2 or higher³, and so this assessment reviews the availability of reasonably available comparative sites in Flood Zone 1 (the lowest risk area).

² Chichester District Council Level 1 SFRA (December 2022): Appendix E – Fluvial and Tidal Climate Change (pp5)

³ Being no lower in risk terms than the application site, and in any event subject to the need for Site Specific Flood Risk Assessment to demonstrate that risk can be mitigated, as has been shown for this site.



© Environment Agency copyright and / or database rights 2018. All rights reserved. © Crown Copyright and database right 2018. Ordnance Survey licence number 100024198.

Figure 2: Flood Map for Planning, source: Environment Agency

2. THE SITE & PROPOSED DEVELOPMENT

- 2.1 The site is outlined in red in Figure 1 and its location and description are detailed in full in the other submitted documents supporting the application.
- 2.2 The proposals are identified on Figure 3 and comprise the erection of 9 residential dwellings with associated access, infrastructure, parking and landscaping. Residential development is classified as 'more vulnerable' by practice guidance but, as described by the scheme and accompanying Flood Risk Assessment, the areas at risk of flooding are wholly outside the site area (when recognising approved mitigation of the site access) and where built development is proposed and does not interact with any shared external areas (e.g. estate roads, landscaped areas), or private areas proposed to serve the dwellings. Areas at 'risk' of flooding remain essentially outside the site boundaries, with the mitigated approved as part of the site access addressing any flood risk concerns.



Figure 3: Proposed Site Layout Plan

3. SEQUENTIAL TEST APPROACH

- 3.1 When undertaking the Sequential Test and comparing reasonably available sites in line with the aforementioned guidance with the application site, the Environment Agency advises that:

"...Site[s] should be compared in relation to flood risk Local Plan status; capacity; and constraints to delivery including availability, policy restrictions, physical problems or limitations, potential impacts of development, and future environmental conditions that would be experienced by the inhabitants of the development"

- 3.2 The approach and the key criteria used for comparison are detailed below:

Application of the Sequential Test

- 3.3 Planning Practice Guidance (PPG) entitled 'How should the Sequential Test be applied to planning applications' advises:

"For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. 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: 027 Reference ID: 7-027-20220825).

- 3.4 The PPG also states that *"reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development... these could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development"*(paragraph: 028 Reference ID: 7-028-20220825).

- 3.5 In terms of guidance on deciding whether an application passes the sequential test, the PPG states that *"relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other 'reasonably available' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current status of relevant sites to determine if they can be considered 'reasonably available'"*(Paragraph: 029 Reference ID: 7-029-20220825).

Area of Search

- 3.6 The application of a sequential test firstly requires a geographical extent to be defined to identify the area of search for potential alternative sites. As outlined above, the PPG states that *“the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed”*.
- 3.7 Although the site is located within Chichester District, it is at the northern fringe of the District separated from the more urbanised parts including Chichester and its surroundings, by the South Downs National Park. As such, in abutting the district/county border with Waverley Borough Council (WBC) in Surrey, the site and surroundings relate more closely to the housing market of Haslemere and the villages to the north/north west which are in East Hampshire District. The neighbouring settlement of Haslemere is the largest (within WBC) and closest, and provides many of the facilities and services for residents in this part of the Chichester District.
- 3.8 Due to the relationship of the site with the neighbouring Borough and settlement, an initial search/site sieve area was defined as wide as 2km radius from the site (see Figure 4), in order to provide a sufficient and representative local catchment, housing demand and local market.

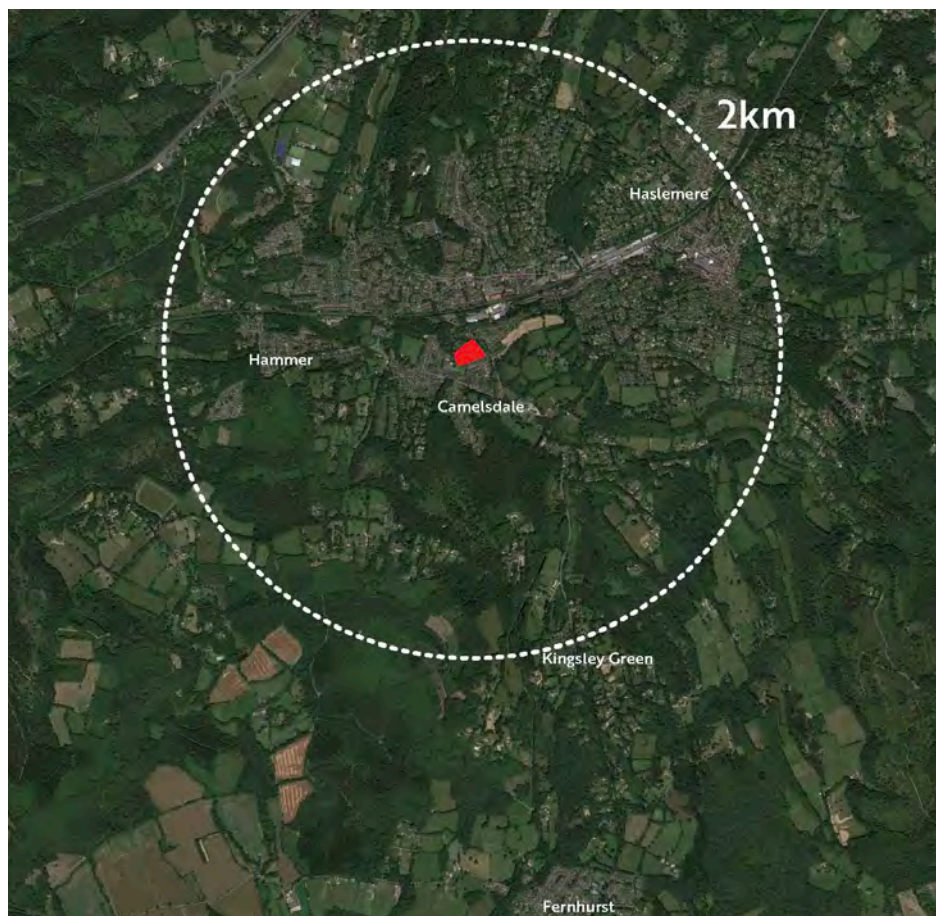


Figure 4: Area of Search

Identification of Sites

3.9 To identify potential alternatives to the application site to be assessed by the Sequential Test the following sources of evidence have been utilised:

- Planning permissions within search area granted within the last 3 years, for 5+ dwellings
- Sites identified as deliverable or developable within the search area in the Chichester District Council Housing and Economic Land Availability Assessment 2021 (plans attached at Appendix 1)
- Sites allocated for development in the search area in the Chichester District Council Site Allocation Development Plan Document 2014-2029
- Sites identified as deliverable or developable within the search area in the Waverley Borough Council Land Availability Assessment (November 2020), plans attached at Appendix 2
- Sites allocated for development in the search area in the Waverley Borough Local Plan Part 2: Site Allocations & Development Management Policies (March 2023)
- A search for 'Land' and 'Commercial Property' for sale on the Rightmove website on 29th November 2023 (website address: www.rightmove.co.uk)

3.10 The results of the site search is set out below in Table 1.

Flood Risk Criteria

3.11 The Planning Practice Guidance advises when the Sequential Test is normally to be applied stating that:

"The Sequential Test should be applied to 'Major' and 'Non-major development' proposed in areas at risk of flooding, but it will not be required where... The site is in an area at low risk from all sources of flooding, unless the Strategic Flood Risk Assessment, or other information, indicates there may be a risk of flooding in the future"

(Paragraph: 027 Reference ID: 7-027-20220825)

3.12 The site has not already been previously assessed at any plan-making stage. Chichester District Council has prepared a Level 1 SFRA for the whole District (dated December 2022) to accompany its emerging local plan. As noted above this does not identify any history of flooding on-site, any on-site area of flood risk; flood zone, taking account of climate change or risk of groundwater flooding. It does however show some risk of surface water flooding within part of the site] and part of the site within an EA flood Alert area. SFRA plans attached at Appendix 3. The draft plan does not propose/review this site for allocation, (no allocations are proposed in the emerging plan in the search area) and consequently, the Level 2 SFRA undertaken (also December 2022) has not already reviewed this site. This means, simply, it is appropriate to apply the Sequential Test at the planning application stage.

3.13 The site allocations made by the Local Plan Part 2 for Waverley Borough was informed by Level 2 SFRA⁴. This considered sites within neighbouring Haslemere, including those affected by present and future flood risk. Allocated sites are considered in the assessment below.

Need for Development (Housing Capacity)

3.14 Housing and housing need is determined by housing market areas and the provision and location of factors such as facilities, services, public transport and employment, which by their nature are cross-boundary and not determined by local authority administrative areas.

3.15 Chichester District Council has insufficient land to meet its 5 year housing land supply requirement. The Council's latest position statement identified a land supply of 4.74 years as at 1st April 2022 (a shortfall of 176 dwellings), with the land supply position tested in a recent appeal decision on land east of Broad Road, Nutbourne/ land west of Drift Lane, Chidham, where the Inspector confirmed the housing supply position to be approximately 4.4 years (refs: 20/03320/OUTEIA / 20/03321/OUTEIA, decision dated 29th August 2023).

3.16 The neighbouring authority, Waverley Borough Council also has insufficient land to meet its 5 year housing land supply requirement, with its latest published position statement (published October 2023) identifying a supply as at 3.89 years as at 1st April 2023 (a shortfall of 836 dwellings).

3.17 In light of the need to provide housing, alternative sites should have the capacity to provide a similar quantum and range of housing types as the proposal. As the scheme is below the threshold to require affordable housing provision in line with Policy 34 of the adopted Local Plan: Key Policies 2011-2029 then alternate sites do not necessarily need to be of a size required to provide affordable housing but any disaggregation needs to be realistic⁵ and in this case we have assessed that a minimum alternative site size of 5 dwellings is robust.

3.18 The indicative mix of housing reflects the requirement for "an appropriate density of development. This will be determined by its immediate context, on-site constraints, the type of development proposed and the need to provide an appropriate mix of dwellings", set out in Policy 33.

3.19 It should be noted that not even sites of a similar or substantially larger size will be nearly sufficient by themselves to resolve the substantial housing shortfall within CDC. Moreover, it is true that greater housing provision will come from urbanised areas of the district to the south surrounding Chichester which will not resolve housing needs in the northern part/housing market areas of the district. While outside of the District's control it will be a material consideration that there is a significant shortfall of housing provision in adjacent Waverley Borough.

⁴ [Strategic Flood Risk Assessment Level 2 Report and Sites](#) (Capita, December 2016, pp17)

⁵ having regard to the likelihood of multiple windfall developments being consented and delivered in the search area within a similar timeframe – see also para.17 CDC Five Year Housing Supply: Updated Position 1 April 2022

Planning Policy

3.20 The comparison sites have been assessed to determine if there are any planning policy designations that would affect the delivery of housing in principle. Identified sites have been reviewed against adopted land use policies of Chichester District Council and Waverley Borough Council and the corresponding Proposals Maps. Salient points include:

Chichester Core Strategy

Policy 4: Housing Provision sets the District's housing requirement for the plan period 2012-2029, including 339 dwellings in the north of the district. Accompanying table 7.2 sets out the locations for development and is supported by strategic allocations (none are located within the search area).

Policy 26: Existing Employment Sites advises that existing employment sites will be retained to safeguard their contribution to the local economy and planning permission for the loss of employment uses will be resisted where it can be demonstrated that the site is no longer required and is unlikely to be re-used or redeveloped for employment uses.

Policy 45: Development in the Countryside seeks to resist development in the countryside unless a countryside location is required but accepts sustainable development in the countryside where specific criteria are met (including a close relationship with existing buildings or settlement, it does not prejudice viable agricultural operations and proposals requiring a rural setting).

Policy 54: Open Space, Sport and Recreation seeks to retain, enhance and increase the quantity and quality of open space, sport and recreation facilities and seeks to resist the loss of such spaces.

The Core Strategy is accompanied by a separate Site Allocations DPD, although no housing allocations are identified in Lynchmere Parish.

Waverley Borough Local Plan Part 1: Strategic Policies and Sites

Policy SP2: Spatial Strategy seeks to maintain the character of the Borough and secure sustainable development, which includes avoiding major development within the AONB and focussing development on the main four settlements, which includes Haslemere.

Policy LRC1: Leisure and Recreation Facilities seeks to retain, enhance and increase the quantity and quality of open space, sport and recreation facilities and seeks to resist the loss of such spaces and will only permit the loss of open space unless it is no longer required or alternative provision is available or provided.

Policy RE1: Countryside beyond the Green Belt states that the intrinsic character and beauty of the countryside will be recognised and safeguarded.

Policy RE2: Green Belt states that these areas will be protected from inappropriate development and development will only be permitted where very special circumstances can be demonstrated.

Policy EE2: Protecting Existing Employment Sites only seeks to support the loss of existing employment sites where there is no reasonable prospect of it being used for employment use. Where a change is required to meet an identified housing need, applications will normally be approved, subject to no strong economic reason why it would be inappropriate.

Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies

Policy DM17: Haslemere Hillsides seeks to retain the wooded appearance of the hillside and the character and setting of the town, but not exposing existing development to view or reducing the green backdrop and would not result in a material loss of tree cover.

Policy DM27: Development within Town Centre is generally supportive of development within the town centres, including higher density housing schemes, particularly part of a mixed use scheme.

4. ASSESSMENT OF ALTERNATIVE AVAILABLE SITES

- 4.1 Table 1 below contains a list of deliverable and potentially developable sites within the area of search as identified by the evidence sources set out above.
- 4.2 The table assesses each site against the location and site / surrounding criteria identified and discounts sites that:
- Have a policy designation for an alternative land use
 - Already have extant consent for residential development
 - Are not identified as either 'Deliverable' or 'Developable' in HELAA/LAA
 - Are located in Flood Zones 2 & 3
 - Cannot deliver a comparable number of housing units (>5) and a range of housing types
- 4.3 No sites were identified within proximity of the site within Chichester District, though this was not surprising given the small surrounding area within its administrative coverage. Within this part of the site search area there were no planning permissions for sites of 5+ dwellings within the past 3 years, no sites identified as developable or deliverable in CDC's HELAA and none that are, or are proposed to be, allocated for development.
- 4.4 Sites were not identified within the South Downs National Park which washes over much of the CDC area to the south of the site. There are no allocated sites within the SDNPA part of the search area which is rural and locations within countryside and national park would carry a policy presumption against comparable development. The only sites identified for further assessment were therefore within Waverley Borough in the surrounding Haslemere area. Haslemere, is a sustainable settlement which can support housing growth so such sites may, in principle, represent sustainable development alternatives having regard to wider planning goals.
- 4.5 A search of 'land' and 'commercial property' on the www.rightmove.co.uk website was undertaken of the search area on 29th November 2023 and this only identified one site (Kings Road, Haslemere), details attached at Appendix 4 and included in table 1.
- 4.6 Further to the application of the above criteria only site 9, listed below, was identified as meeting the further selection above criteria:
- 9. Land at Wey Hill Youth Campus, Haslemere

Table 1: Assessment of Alternative Sites

| | Site Name / Address | Local Authority | Evidence Base | HELAA Ref No | HELAA Status | Planning Policy | Flood Zone | Size (ha) | Capacity | Further Assessment |
|----|---|-----------------|--------------------------------------|--------------|---------------------------------|--|------------|-----------|----------|--------------------|
| 1 | Sturt Farm Barn, Sturt Road, Haslemere, GU27 3SE | WBC | Planning Permission | n/a | Commitment Site (WA/2023/00589) | n/a | 1 | 0.33 | 5 * | NO |
| 2 | Dene End Farm, Midhurst Road, Haslemere, GU27 3AA | WBC | Planning Application (WA/2023/02521) | n/a | Commitment Site | Countryside beyond the Green Belt and AONB | 1 | | 5 ** | NO |
| 3 | 2 Kings Road, Haslemere, GU27 2QA | WBC | Planning Application (WA/2023/01680) | n/a | Not Promoted | Town Centre | 2 & 3 | | 8 *** | NO |
| 4 | Chapman House, Meadway, Haslemere, GU27 1NN | WBC | Planning Permission | n/a | Commitment Site (WA/2023/00560) | n/a | 1 | | 6 **** | NO |
| 5 | Chapman House, Meadway, Haslemere, GU27 1NN | WBC | Prior Approval | n/a | Commitment Site (CR/2021/0004) | n/a | 1 | | 14 ***** | NO |
| 6 | 19 Junction Place, Haslemere, GU27 1LE | WBC | Planning Permission | n/a | Commitment Site (WA/2023/01149) | n/a | 1 | | 5 ^ | NO |
| 7 | Ardquin Fine Arts Ltd, 15 Junction Place, Haslemere, GU27 1LE | WBC | Planning Permission | n/a | Commitment Site (WA/2022/00290) | n/a | 1 | | 5 ^^ | NO |
| 8 | Royal Oak, Critchmore Hill, Haslemere, GU27 1LS | WBC | Planning Permission | n/a | Commitment Site (WA/2023/0054) | n/a | 1 | | 6 ^^ | NO |
| 9 | Land at Wey Hill Youth Campus, Haslemere | WBC | Site Allocation (DS 04) | 697 | Site Allocation (DS 04) | Allocated site, within Town Centre, anticipated delivery 2025-2028 | 1 | 0.88 | 34 ^^ | YES |
| 10 | Georgian House Hotel, 37-41 High Street, Haslemere, GU27 2JY | WBC | Planning Permission | 973 | Commitment Site (WA/2019/1525) | Town Centre | 1 | 0.25 | 18 ^^ | NO |

| | | | | | | | | | | |
|----|--|-----|---------------------|------|--------------------------------|---|-------|-----|----------|----|
| 11 | Haslemere Preparatory School, The Heights, 5 Hill Road, Haslemere | WBC | Planning Permission | 980 | Commitment Site (WA/2018/1771) | Allocated site (DS 05) with consent, within Haslemere Hillsides | 1 | 1.0 | 24 # | NO |
| 12 | Fairground Car Park, Wey Hill, Haslemere | WBC | Allocation (DS 07) | 1004 | Allocation (DS 07) | Allocated site within Town Centre, anticipated delivery 2030-31 | 1 | 0.6 | 20 ## | NO |
| 13 | Haslemere Key Site, West Street, Haslemere | WBC | Allocation (DS 01) | 141 | Allocation (DS 01) | Allocated site within Town Centre, anticipated delivery 2030-32 | 2 & 3 | 2.5 | 30 ### | NO |
| 14 | Red Court, Scotlands Lane, Haslemere | WBC | LAA | 1124 | Potentially Developable | Countryside beyond the Green Belt & AGLV | 1 | 4.9 | 50 #### | NO |
| 15 | National Trust Car Park, Branksome Place, Hindhead Road, Haslemere | WBC | Allocation (DS 09) | 1105 | Allocation (DS 09) | Allocated site within Countryside beyond the Green Belt, AONB, anticipated delivery 2027-28 | 1 | 0.4 | 13 ##### | NO |
| 16 | 34 Kings Road, Haslemere | WBC | Planning Permission | 1067 | Commitment Site (WA/2020/0881) | Allocated site (DS 11) with consent, within Town Centre | 3 | 0.3 | 5 \$ | NO |
| 17 | Kings Road, Haslemere | WBC | Rightmove | n/a | Commitment Site | Town Centre, planning consent for conversion to 3 flats (WA/2022/00210) | | | 3 \$\$ | NO |

*Permitted number of units in application reference WA/2023/00589i
 **Permitted number of units in application reference WA/2023/02521
 ***Permitted number of units in application reference WA/2023/01680
 ****Permitted number of units in application reference WA/2023/00560
 ***** Permitted number of units in application reference CR/2021/0004
 ^ Permitted number of units in application reference WA/2023/01149
 ^^ Permitted number of units in application reference WA/2022/00290
 ^^ Permitted number of units in application reference WA/2023/0054
 ^^ Number of units identified in site allocation DS 04
 ^^ Permitted number of units in application reference WA/2019/1525
 # Permitted number of units in application reference WA/2018/1771
 ## Number of units identified in site allocation DS 07
 ### Number of units identified in site allocation DS 01
 #### Number of units identified in LAA
 ##### Number of units identified in site allocation DS 09
 \$ Permitted number of units in application reference WA/2020/0881
 \$\$ Permitted number of units in application reference WA/2022/00210

5. FURTHER ASSESSMENTS

Individual Sites

'9. Land at Wey Hill Youth Campus, Haslemere (Site Allocation DS 04)'

- 5.1 This site is located with the urban area of Haslemere. It is allocated for approximately 34 dwellings in the Local Plan Part 2, with delivery anticipated from 2025/2026 onwards. The buildings are currently in community use and occupied by groups as Scouts, Guides and St John Ambulance, however. Although the site is allocated for development, Policy DS 04 requires the relocation of the community groups from the site and states that the Council is working to ensure that the current users can be accommodated elsewhere.
- 5.2 The site has not been discounted based on its size, despite being much larger than the application proposals. In any event this does not matter. The site does not benefit from planning permission and no applications have been submitted for the suggested yield of 34 dwellings. With no permission in place and residential delivery dependent on relocation and a replacement community facility (with no evidence this has been identified), its status cannot be 'reasonably available' for Sequential Test purposes as it is not 'deliverable' according to the NPPF definition (available now).
- 5.3 As such, the site can be discounted (per PPG, paragraph 029), although that does not prove to be consequential in this assessment, as set out below.
- 5.4 In conclusion, no sequentially preferable sites, in Flood Zone 1, have been identified.

Whether development on the application site is necessary

- 5.5 The application of the sequential test to a broad geographical search, representative of the local housing market area, shows there to be no sequentially preferable sites available for the development. Several sites are already controlled and have the benefit of planning permission. There remains a need for housing, as shown by the shortfall in the supply within CDC, and in neighbouring Waverley Borough, required by national planning policy.
- 5.6 Setting aside the discounting of sites in section 9, it is notable that even if all other identified sites were to come forwards together development of the application site would remain necessary in sequential terms⁶ to meet housing needs and land supply requirements. While the application of the Sequential Test is important in establishing whether reasonable alternatives exist that are at a lower flood risk we conclude by returning to the fact that the majority of the application site is also demonstrated to be at a low flood risk (within Flood Zone 1) and that the Site Specific Flood Risk Assessment shows the development of the site is contained within that low risk area, and can be made safe for its lifetime.

⁶ Per paragraph 159 of the Framework

6. CONCLUSIONS

- 6.1 This report sets out the background, methodology, and findings of the assessment undertaken for the availability of alternative sites that may be sequentially preferable to the application site north of Sturt Avenue, Haslemere on flood risk grounds. This sequential test has been prepared to address comment from the Planning Inspector in a recent appeal, but should be noted however that the current application site boundary has been revised, to exclude the areas at risk of flooding and as such the site now essentially falls within flood zone 1 (when taking on board the approved mitigation for the site access).
- 6.2 The sequential assessment has reviewed relevant and necessary public data sources that have, and will, guide development opportunities within the defined area of search, which is appropriate to provide a sufficient and representative local catchment, housing demand and market. Consideration has been given to a range of sites to examine if they are reasonably available and satisfy the assessment criteria detailed in Chapter 3 of this report.
- 6.3 Paragraph 027 (Ref. ID: 7-027-20220825) of the Planning Practice Guidance advocates that when applying the Sequential Test to individual applications, a pragmatic approach on the availability of alternatives should be taken.
- 6.4 The report demonstrates that there are no other reasonably available alternative sites within the defined area of search. For the above reasons the application site is considered to pass the sequential test.
- 6.5 Even the sites identified in combination, though they are not preferable, along with local plan site allocations, are not sufficient in terms of supply to meet the short term 5-year supply requirement set out by the Local Plan.
- 6.6 The majority of the application site is within Flood Zone 1, and the accompanying Site Specific Flood Risk Assessment demonstrates that the development sits within that and can be made safe for its lifetime.









APPENDIX 1

Maps from Chichester District Council Housing and Economic Land Availability Assessment 2021

CHICHESTER DISTRICT COUNCIL

Lynchmere

Legend

-  SDNP Boundary
-  Settlement Boundary
-  Parish boundary
-  Developable
-  Discounted
-  Planning Permission/Under Construction
-  Site Allocation
-  Regeneration Area

Legend note: Please be aware that not all features from the legend may appear in this map, but may occur on other Chichester Local Plan HELAA maps.

HLY0009

HLY0007a

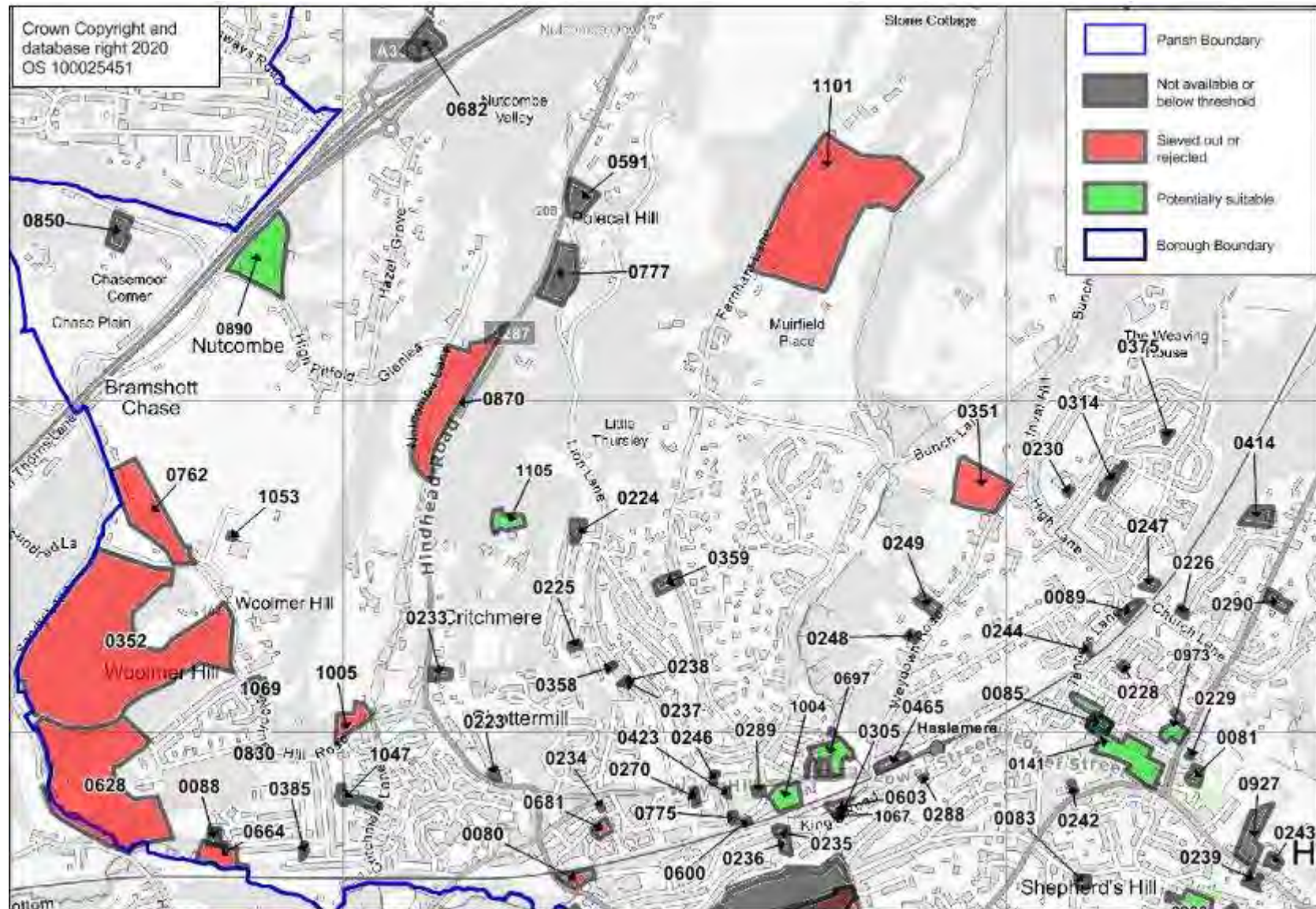
Lynchmere CP



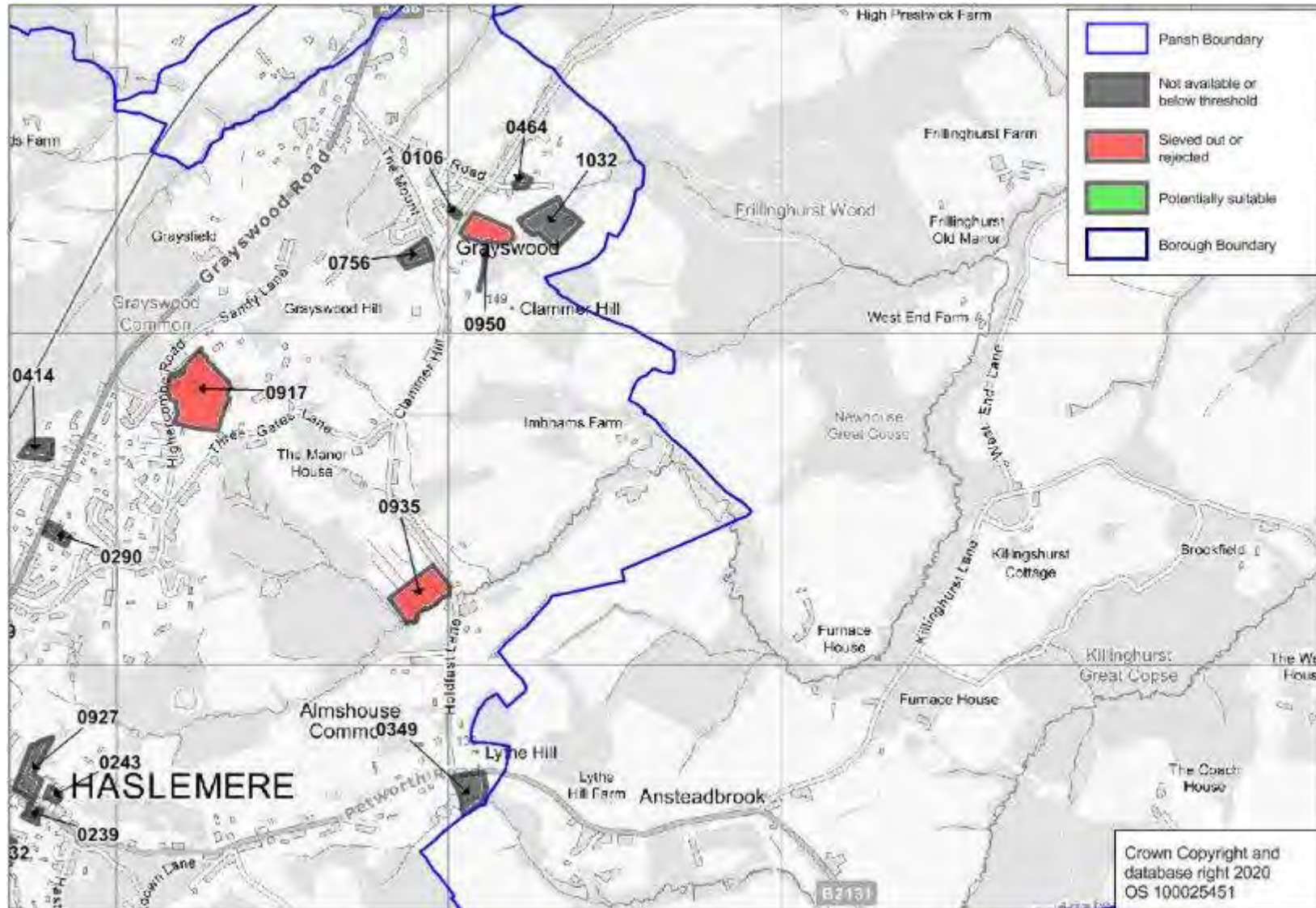
APPENDIX 2

Maps from Waverley Borough Council Economic Land Availability Assessment (November 2020)

Map 22: Haslemere West

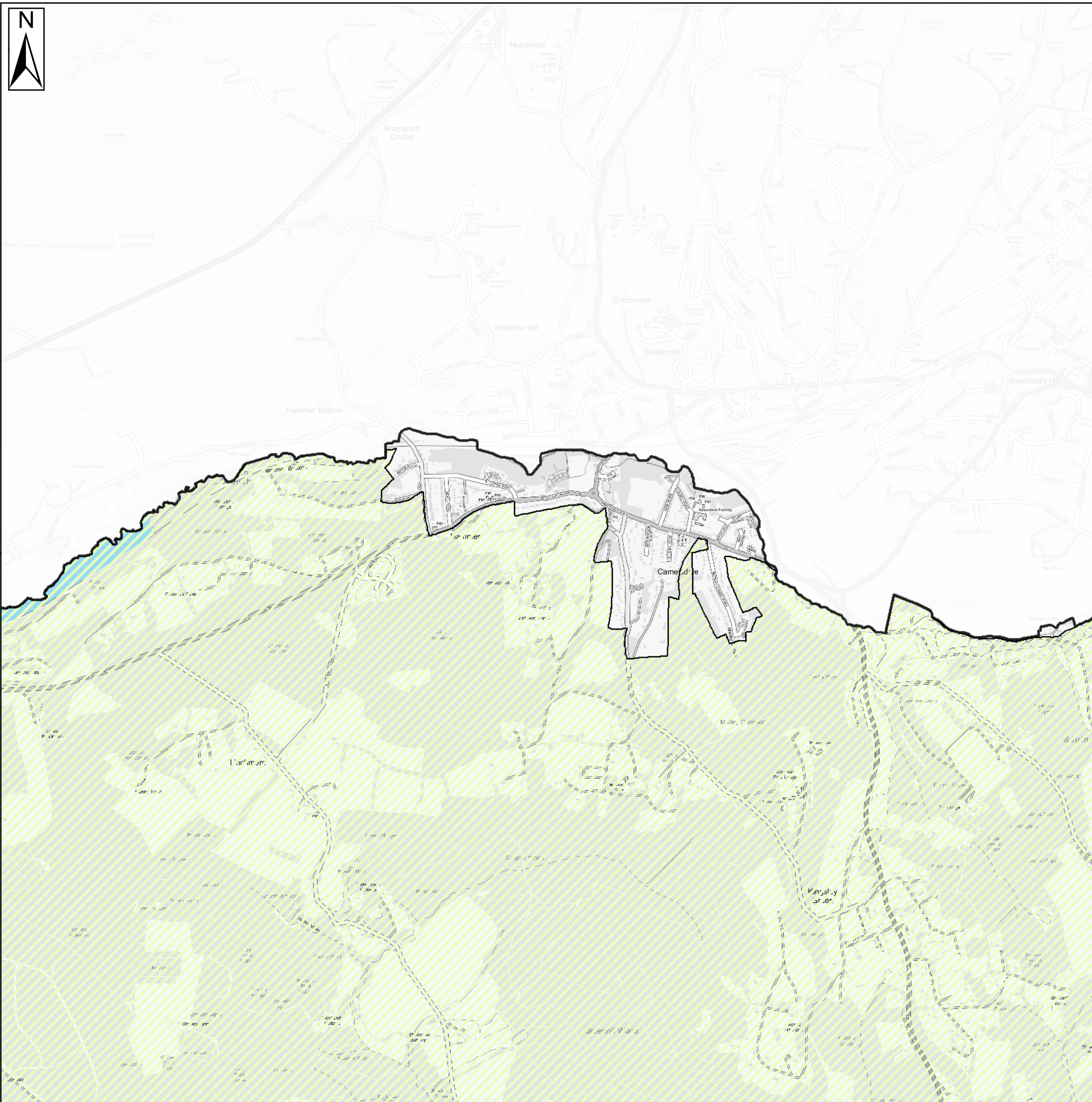


Map 23: Haslemere East

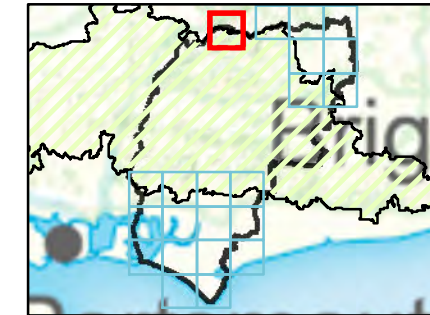


APPENDIX 3

Maps from Chichester District Level 1 SFRA (December 2022)



Key Plan



Legend

- Chichester District
- South Downs National Park
- EA Recorded flood outline
- WSCC recorded flood incidents**
- Source of Flooding**
- River
- Coastal
- Tidal
- Drainage (Sewer or Surface Water)
- Failure
- Unknown
- Other

Notes

The Historic Flood Map shows the recorded incidents and flood outlines provided by West Sussex County Council and Environment Agency.

Flooding incidents provided have been categorised based upon the details provided in the records. Unknown flood points could not be determined from the information provided, and therefore could be from a number of sources.

Please note that not all historical records may be shown on this map, and that it is therefore advised you contact the Environment Agency or West Sussex County Council for updated information.

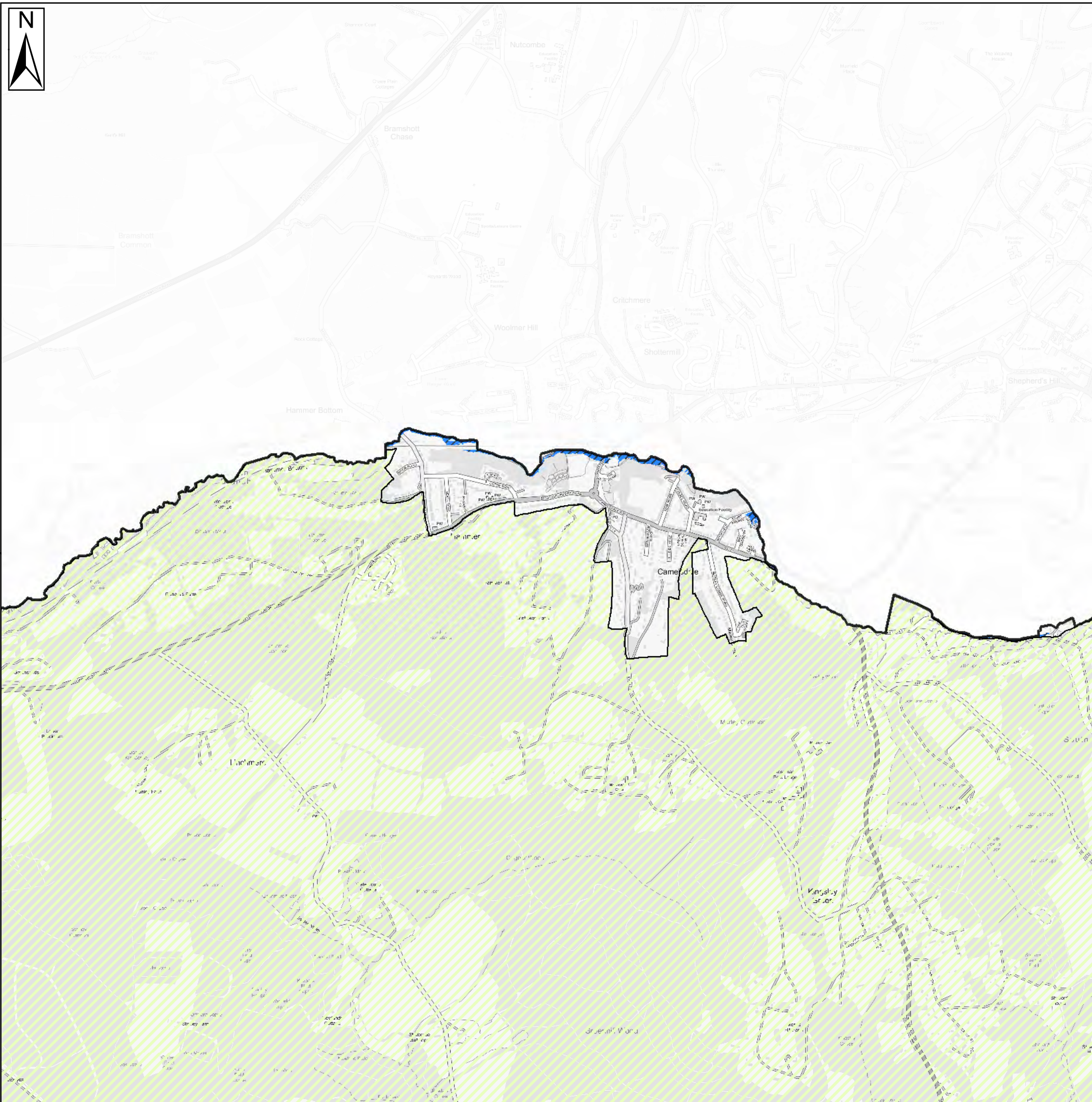


Contains Ordnance Survey data © Crown copyright and database right 2022.
Contains public sector information licensed under the Open Government Licence v3.0.

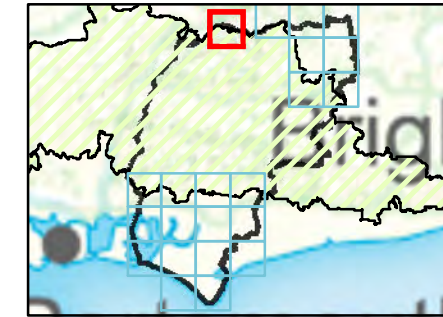
CHICHESTER DISTRICT COUNCIL SFRA: APPENDIX B - HISTORIC FLOODING

This document is the property of Jeremy Benn Associates Ltd. It shall not be reproduced in whole or in part, nor disclosed to a third party, without the permission of Jeremy Benn





Key Plan



Legend

- Chichester District
- South Downs National Park
- Flood Zone 3a used to define Flood Zone 3b
- Flood Zone 3b
- Flood Zone 3a
- Flood Zone 2

Notes

Flood Zone 1: Comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1% AEP).

Flood Zone 2: This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (0.1% - 1% AEP) or between 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.1% – 0.5% AEP) in any year.

Flood Zone 3a: This zone comprises land assessed as having a greater than 1 in 100 annual probability of river flooding (>1.0% AEP) or a greater than 1 in 200 annual probability of flooding from the sea (>0.5% AEP) in any year.

Flood Zone 3b: This zone comprises land where water has to flow or be stored in times of flood (the functional floodplain). The SFRA identified this Flood Zone as land which would flood with an annual probability of 1 in 20 years, where detailed modelling exists. Where the 1 in 20-year outputs are not available, the precautionary approach has been taken, surrogate return periods have been used (e.g. 1 in 25-year (4%AEP), if available). Where this was not available, then Flood Zone 3a has been used. If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site-specific FRA to define and confirm the extent of Flood Zone 3b.

The Environment Agency regularly reviews its hydrology, hydraulic modelling and flood risk mapping, and it is important that they are approached to determine whether updated (more accurate) information is available prior to commencing a site-specific FRA.

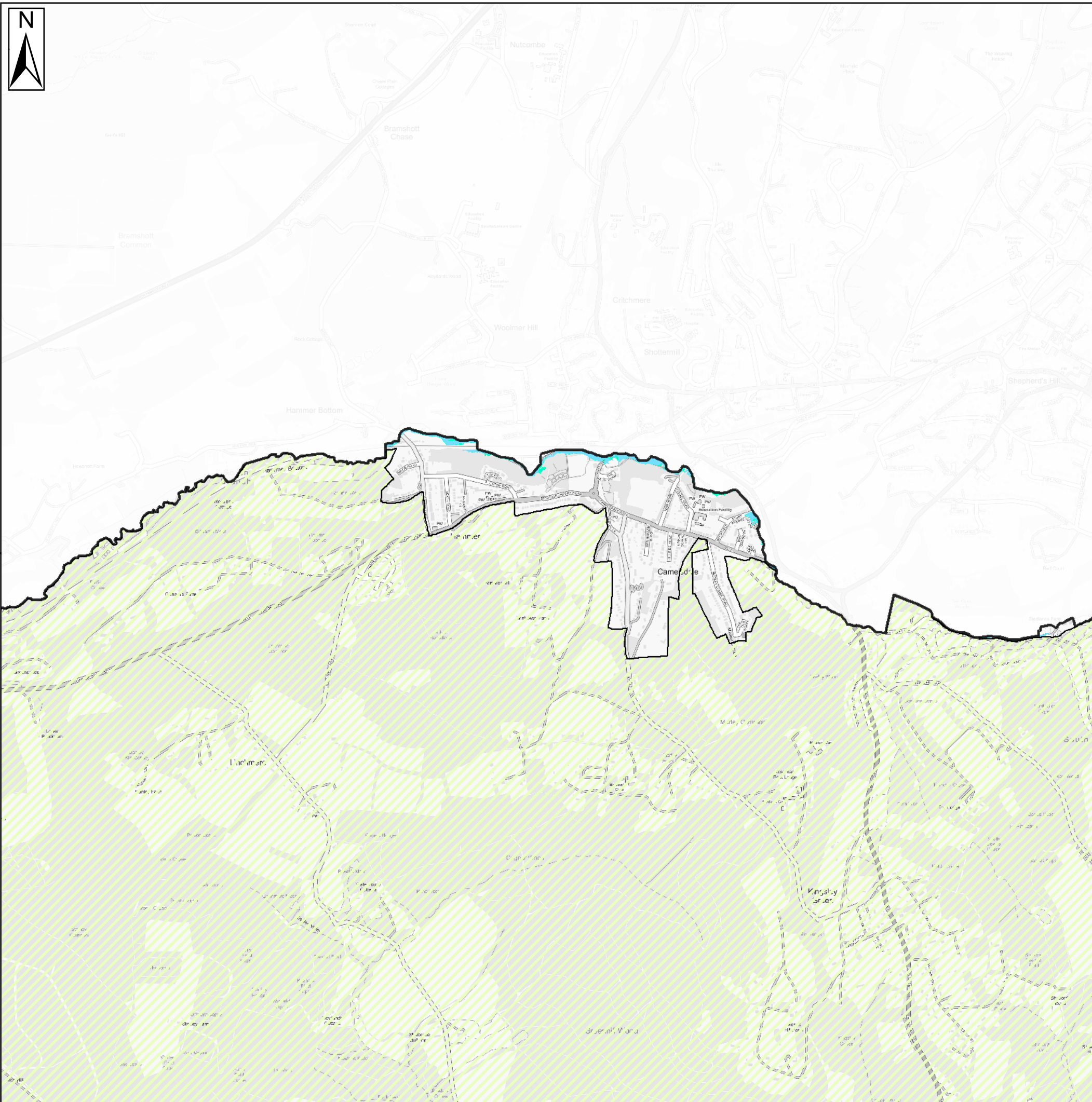


Contains Ordnance Survey data © Crown copyright and database right 2022.
Contains public sector information licensed under the Open Government Licence v3.0.

**CHICHESTER DISTRICT COUNCIL
SFRA: APPENDIX D - FLOOD ZONES**

This document is the property of Jeremy Benn Associates Ltd. It shall not be reproduced in whole or in part, nor disclosed to a third party, without the permission of Jeremy Benn





Key Plan



Legend

- Chichester District
- South Downs National Park
- Flood Zone 3a

Fluvial return periods

- 1% AEP plus 25% CC
- 1% AEP year plus 35% CC
- 1% AEP year plus 64% CC
- Flood Zone 2 - proxy for climate change

Tidal

- 0.5% AEP 2091 Higher Central allowance
- 0.5% AEP 2091 Upper End allowance
- 0.5% AEP 2121 Higher Central allowance
- 0.5% AEP 2121 Upper End allowance
- 0.5% AEP 2100 H++ allowance

Notes

Where there is no fluvial model available, Flood Zone 2 has been used to provide indicative information on climate change. Detailed hydraulic modelling using topographic survey would be required at a site-specific level to confirm the flood risk to these sites.

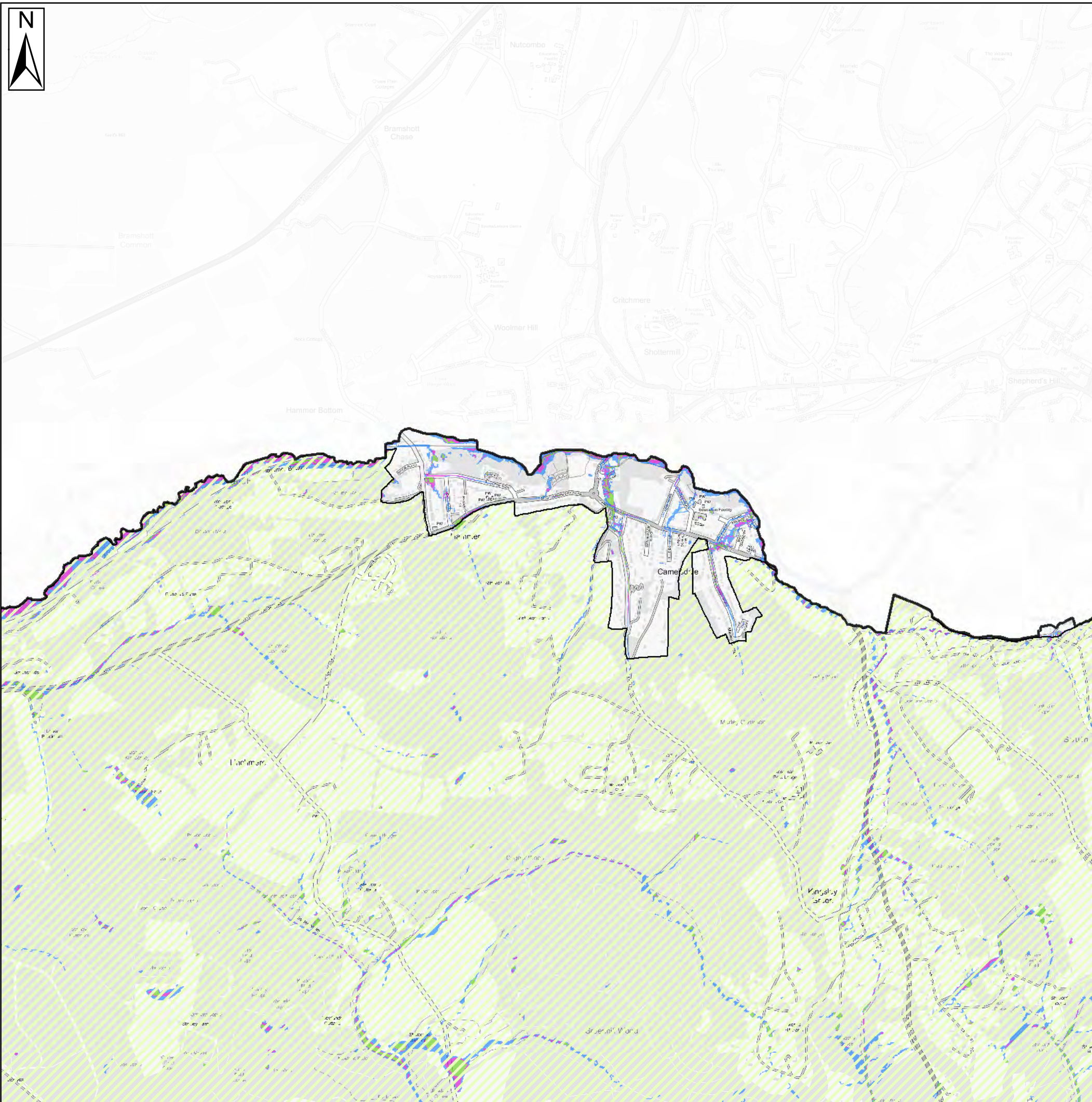


Contains Ordnance Survey data © Crown copyright and database right 2022.
Contains public sector information licensed under the Open Government Licence v3.0.

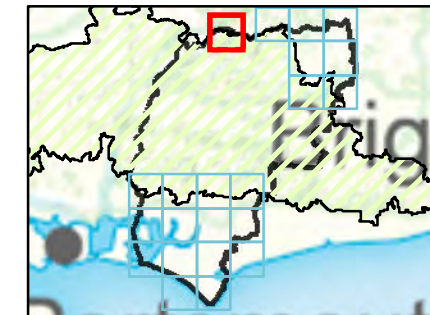
**CHICHESTER DISTRICT COUNCIL
SFRA: APPENDIX E - CLIMATE CHANGE**

This document is the property of Jeremy Benn Associates Ltd. It shall not be reproduced in whole or in part, nor disclosed to a third party, without the permission of Jeremy Benn





Key Plan



Legend

- Chichester District
 - South Downs National Park
- Risk of Flooding from Surface Water**
- 3.33% AEP (1 in 30-year)
 - 1% AEP (1 in 100-year)
 - 0.1% AEP (1 in 1000-year)

Notes

The Environment Agency's risk of Flooding from Surface Water (RoFSW) is derived primarily from identifying topographical flow paths of existing watercourses or dry valleys that contain some isolated ponding locations in low lying areas. They provide a map which displays different levels of surface water flood risk depending on the annual probability of the land in question being inundated by surface water.

the results should not be used to understand flood risk for individual properties. The results should be used for high level assessments such as SFRAs for local authorities. If a particular site is indicated in the Environment Agency mapping to be at risk from surface water flooding, a more detailed assessment should be considered to more accurately illustrate the flood risk at a site-specific scale

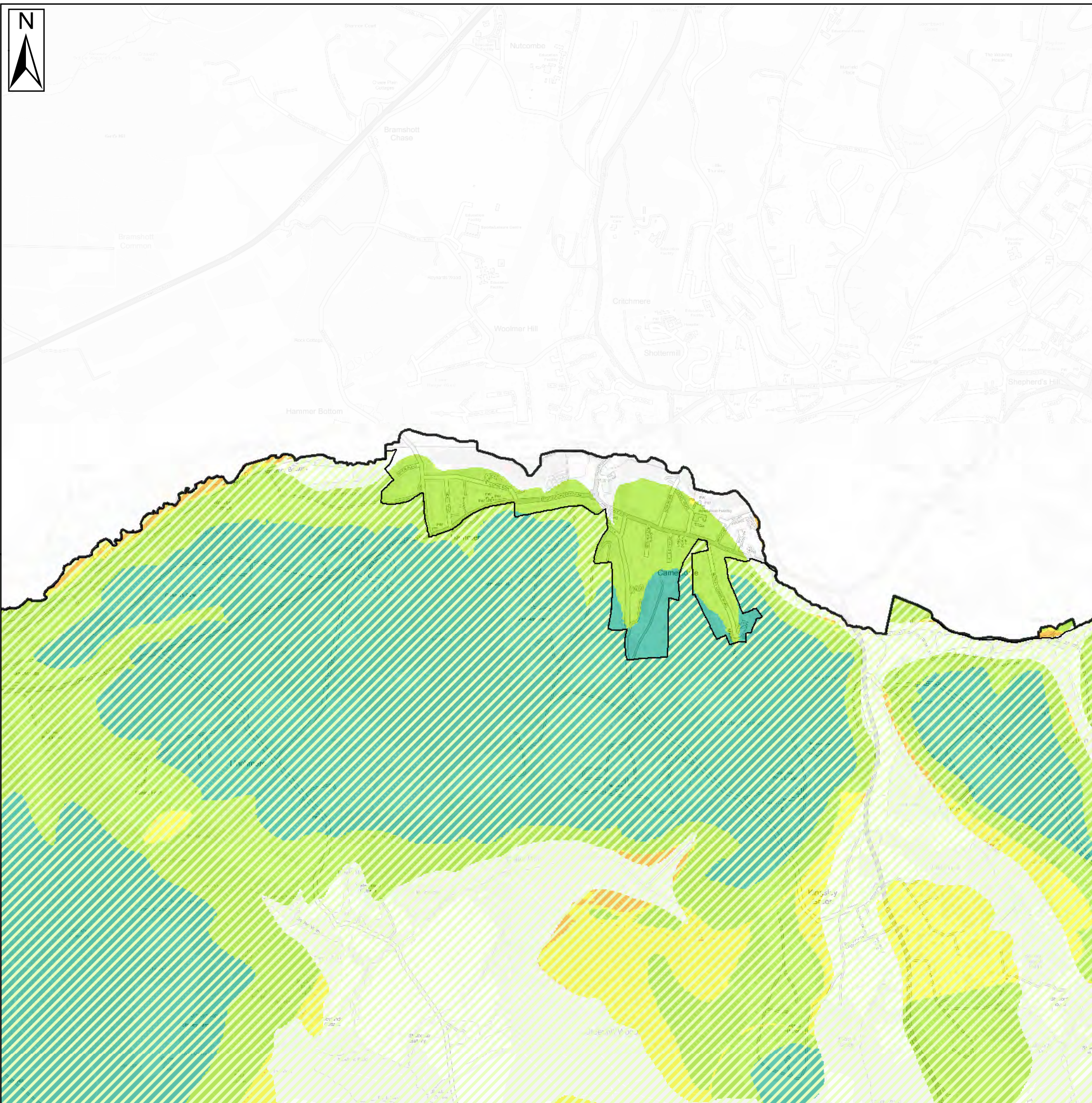


Contains Ordnance Survey data © Crown copyright and database right 2022.
Contains public sector information licensed under the Open Government Licence v3.0.

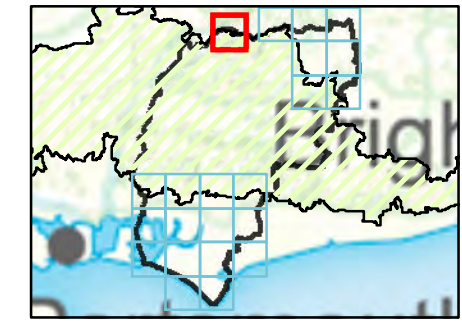
CHICHESTER DISTRICT COUNCIL SFRA: APPENDIX F.1 - RISK OF FLOODING FROM SURFACE WATER

This document is the property of Jeremy Benn Associates Ltd. It shall not be reproduced in whole or in part, nor disclosed to a third party, without the permission of Jeremy Benn





Key Plan



Legend

- Chichester District
- South Downs National Park
- JBA Groundwater Flood Map**
- Depth**
- Groundwater levels are either at or very near (within 0.025m of) the ground surface
- Groundwater levels are between 0.025m and 0.5m below the ground surface
- Groundwater levels are between 0.5m and 5m below the ground surface
- Groundwater levels are at least 5m below the ground surface
- No risk

Notes

It is important to note that the modelled groundwater levels are not predictions of typical groundwater levels. Rather they are flood levels i.e. groundwater levels that might be expected after a winter recharge season with 1% AEP, so would represent an extreme scenario. The map also shows where groundwater is predicted to emerge, but it does not show where the flooding is likely to occur, or to what depths, velocity or hazard.

Contains Ordnance Survey data © Crown copyright and database right 2022. Product copyright and all IPR remain with JBA Consulting Ltd.



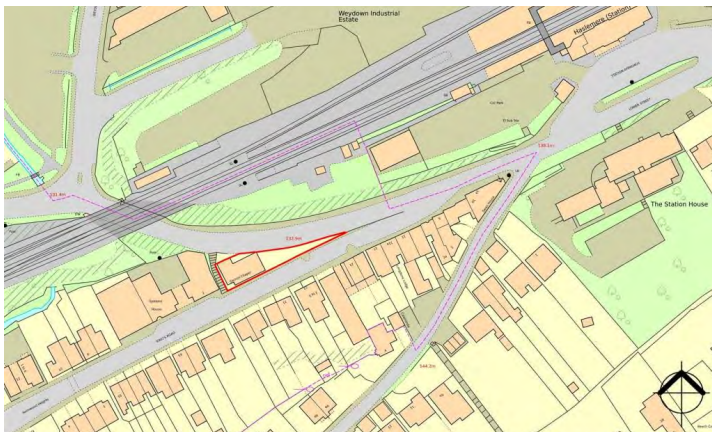
CHICHESTER DISTRICT COUNCIL
SFRA: APPENDIX G - GROUNDWATER

This document is the property of Jeremy Benn Associates Ltd. It shall not be reproduced in whole or in part, nor disclosed to a third party, without the permission of Jeremy Benn



APPENDIX 4

Rightmove.co.uk Search Results (29th November 2023)



Kings Road, Haslemere

Guide Price

£795,000

MARKETED BY

Clarke Gammon, Haslemere

72 High Street, Haslemere, GU27
2LA

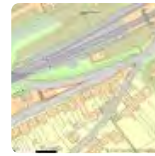


Call agent: 01428 771261

PROPERTY TYPE

 Land

[Request details](#)



Key features

- Freehold investment opportunity
- Close to main line station
- Planning consent for three apartments
- D1 Classification

Property description

A very interesting and unusual freehold investment opportunity of around 2,500 sq ft, having planning consent for conversion to three large apartments with associated amenity space.

Being in a central town location close to Haslemere main line station and bus routes, there may be commercial options for this attractive building, which in the past has been a place of worship.

Waverley Borough Council Planning Ref: WA/2022/00210

Current Classification - D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court.

All main services are connected

Viewings by appointment with the Agents

Tenure - Freehold

Brochures

[Kings Road, Haslemere](#)



LUKEN BECK

Management | Development | Planning

W: [lukenbeck.com](https://www.lukenbeck.com)

T: 023 8063 3440

E: NigelJarvis@lukenbeck.com

E: RobCollett@lukenbeck.com

30 Carlton Crescent
Southampton
Hampshire
SO15 2EW