



SEQUENTIAL TEST ASSESSMENT

In support of planning application for the erection of 8 detached dwellings together with parking and landscaping.

 Land adjoining Mulberry Cottage, High Street, Lydd, TN29 9BB

Prepared by Hume Planning Consultancy Ltd.

On Behalf of Mr R Green

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Director Alister Hume BSc(Hons) PGDIP TP MRTPI **Consultant** Graham Warren MA FRICS MRTPI

VAT Number: 802 9360 43 Registered Number: 5016915 Registered Address: Innovation House, Discovery Park, Sandwich, Kent, CT13 9ND

1 INTRODUCTION

This Sequential Test has been prepared on behalf of Mr R Green to support a detailed planning application enquiry to Folkestone and Hythe District Council (FHDC) for the erection of eight detached dwellings together with parking and landscaping at land adjoining Mulberry Cottage, High Street, Lydd.

The site is located within the policy-defined settlement confines of Lydd, where the principle of development of the site is accepted and a presumption in favour of sustainable development applies.

Due to there being no available sequential test guidance relating to the District, the applicant has referred to guidance adopted by Dover District Council (DDC) in March 2019 (the neighbouring local authority) known as 'Site-specific Guidance for Managing Flood Risk'. This methodology was confirmed to be acceptable by the LPA during pre-application engagement.

2 THE SEQUENTIAL TEST

STEP 1: IS THE SEQUENTIAL TEST APPLICABLE?

The site falls within Flood Zones 1, 2 and 3 as defined by National Planning Policy Guidance (NPPG) and a Flood Risk Assessment has been provided to inform this Sequential Test and support this detailed planning application. In accordance with National Planning Policy Framework 2019 (NPPF), a Sequential Test is required to support applications for new development within areas considered to be at risk of flooding (Flood Zones 2 and 3).

Under these circumstances, it should be established whether there are any alternative or “reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding” instead of the proposed

development site, in an attempt “to steer new development to areas with the lowest risk of flooding” (Paragraph 158). Should reasonably available sites of lower flood risk exist that are consistent with “wider sustainable development objectives” (Paragraph 159), the Framework sets out that development should not be permitted within the area of higher flood risk (Paragraph 155 / 158).

STEP 2: GEOGRAPHICAL SEARCH AREA

The application site is located within the settlement boundary of Lydd and therefore the geographical search area for this Sequential Test is the Romney Marsh Character Area (defined in Figure 1), as required by Policy SS3.



STEP 3: IDENTIFICATION OF COMPARATOR SITES

Size & Scope

As set out in the Council's Site-Specific Guidance for Managing Flood Risk, comparator sites should have a capacity to accommodate a similar number of units ($\pm 10\%$ units) when compared to the proposed scheme. For schemes less than ten units, applicants should round to the nearest whole number.

In the case of the application site, the proposal will deliver eight residential units therefore the comparator sites will have the capacity to deliver 7 – 9 units (based on ($\pm 10\%$ of the proposed units) calculated on the basis of achieving a density of 20-40 dwellings per hectare at each site, and also having regard to other criteria of the sequential test evaluation.

Sources of Information

Potential Comparator Sites have been identified using the following available information:

- Authority Monitoring Report 2018 (AMR) – This report provides information on sites with 'extant planning permission' and allocated sites.
- Brownfield Register – This identifies previously developed sites within the district which are considered to be suitable for housing.
- Strategic Housing Land Availability Assessment 2015/2016 (SHLAA) – This provides a list of individual sites that have been put forward and assessed for housing within the district.

If no or less than two comparator sites can be identified using the above sources, the applicant will carry out an independent search for land of a similar size as the proposal site within the study area.

Deliverability & Availability of Comparator Sites

Comparator sites should be able to accommodate a similar development use as the application site and should be reasonably acceptable in planning terms for the proposed use. Therefore, in addition to considering size and scope of comparator sites, the availability and deliverability of each site should also be considered. The following criteria apply (as set out in the adopted guidance);

- Sites where the proposed use would be contrary to the Development Plan Policy can be discounted as a comparator site providing reasons are clearly given by the applicant as to why a site has been discounted.
- Sites which are for sale (identified through land property agents), and sites put forward as part of the SHLAA process, are both considered available for comparison.
- Sites identified from the latest AMR and brownfield register that have planning permission should also be considered for comparison if permission has expired and work has not yet started on site.
- Conversely, where an extant permission has been implemented (i.e. it can be demonstrated that work has started on site), a site can be discounted from the comparison process.

Comparator Sites

From an in-depth review of the above sources of information, seven sites have been identified which are all of a similar size and scope as the application site and are within the geographical search area. Of these sites, eight have been discounted from the assessment (ref's 2, 3, 5-7) because they are either unavailable, undeliverable or unsuitable for development, as set out in Table 1. Therefore, two Comparator Sites have been carried forward for assessment (ref's 1 and 4).

	Application Site	SHLAA / App Ref	Site Area (ha)	Estimated Unit Capacity	Flood Zone	Status
	Land adjoining Mulberry Cottage	378	0.4	8	1, 2 & 3	Current Application
Ref.	Comparator Sites					
1	Land adjacent 44-46 High Street, Dymchurch	(AMR)	0.03	8	3	Permission has now expired (ref. Y/16/0535/SH). Carried forward for comparison.
2	The Old Slaughterhouse, Brookland	431	0.27	5-8	2 & 3	Discount: Contrary to policy due to it being a greenfield site located outside the settlement boundary (Policies SS1, SS3).
3	Cherry Gardens, New Romney	437	0.53	8-10	2	Discount: Contrary to policy due to it being a greenfield site located outside the settlement boundary (Policies SS1, SS3).
4	Fisher Field, Dungeness Road, Lydd	335	0.45	9-15	1	Carried forward for comparison.
5	Land at Church Road, New Romney	436	0.44	7-10	1	Discount: Contrary to policy due to it being a greenfield site located outside the settlement boundary (Policies SS1, SS3).
6	Land north of Boarman's Lane, Brookland	1016	0.51	6-8	2 & 3	Discount: Contrary to policy due to it being a greenfield site located outside the settlement boundary (Policies SS1, SS3).
7	Land north of Avonlea, Dymchurch Road, New Romney	435	0.51	8-10	1	Discount: Contrary to policy due to it being a greenfield site located outside the settlement boundary (Policies SS1, SS3).

Table 1: List of comparator sites

STEP 4: COMPARISON LEVEL 1

Are the comparator site at lower risk than the application site based on the EA's online flood mapping?

No. A matrix has been completed for the application site and the comparator Sites to show the combined risk of flooding at each site based on mapping hosted by the Environment Agency.

As demonstrated by the completed matrix's at Tables 2-4, the comparator Sites are within the same level of flood risk as the application site (all sites being located within a red box), therefore the comparison is continued to Level 2.

		EA's 'Flood Risk from Surface Water' Map		
		Very Low	Low Risk	Medium – High Risk
EA's 'Flood Map for Planning'	FZ1			
	FZ2			
	FZ3	X		

Table 2: Application Site: Risk of Flooding

		EA's 'Flood Risk from Surface Water' Map		
		Very Low	Low Risk	Medium – High Risk
EA's 'Flood Map for Planning'	FZ1			
	FZ2			
	FZ3	X		

Table 3: Ref 1. Land adjacent 44-46 High Street, Dymchurch

		EA's 'Flood Risk from Surface Water' Map		
		Very Low	Low Risk	Medium – High Risk
EA's 'Flood Map for Planning'	FZ1			X
	FZ2			
	FZ3			

Table 4: Ref 4. Fisher Field, Dungeness Road, Lydd

STEP 5: COMPARISON LEVEL 2

Are the comparator sites located in a hazard rating less than 'moderate' according to the SFRA 2115?

No. Both comparator sites are located within a 'significant' hazard rating area as defined by the SFRA 2115 map; see Figures 2-4. As the application site is located within 'nil', 'low' and a small area within 'moderate' areas (lower hazard ratings), it is concluded that the sequential test is passed.



Figure 2: Application Site: Risk of Flooding



Figure 3: Ref 1. Land adjacent 44-46 High Street, Dymchurch



Figure 4: Ref 4. Fisher Field, Dungeness Road, Lydd