

Site: 16 Selbourne Avenue, Havant PO9 4PX.

Havant Borough Council (HBC) Comments

GeoSmart (GS) Response / Statement

GeoSmart have provided a response to the comments received from HBC.

I have been asked to provide comments on the application of the Flood Risk Sequential & Exception tests for this application. I note that the scheme is a resubmission of APP/19/01254. The flood risk evidence remains the same as for that scheme. On that basis, the comments below raise the same issues as for the previous scheme.

The applicant has provided a detailed Sequential and Exception Test document prepared by consultants. It clearly sets out the flood risk issues of the Sites, as well as the parameters applied to the sequential and exception tests.

The Sequential and Exception Test report reference is: 72330.01R2, undertaken by GeoSmart Information Ltd in December 2019 and updated in February 2020, following initial comments received from the HBC.

Sequential Test

I agree with the consultants that national guidance is not prescriptive about the area of search to be applied to the sequential test. Instead, a pragmatic approach should be taken, appropriate to local circumstances. While I cannot find a reasoned justification for the area of search chosen, I am content with the search being confined to the Leigh Park area of the borough, due to the small size (one dwelling) of the proposed development.

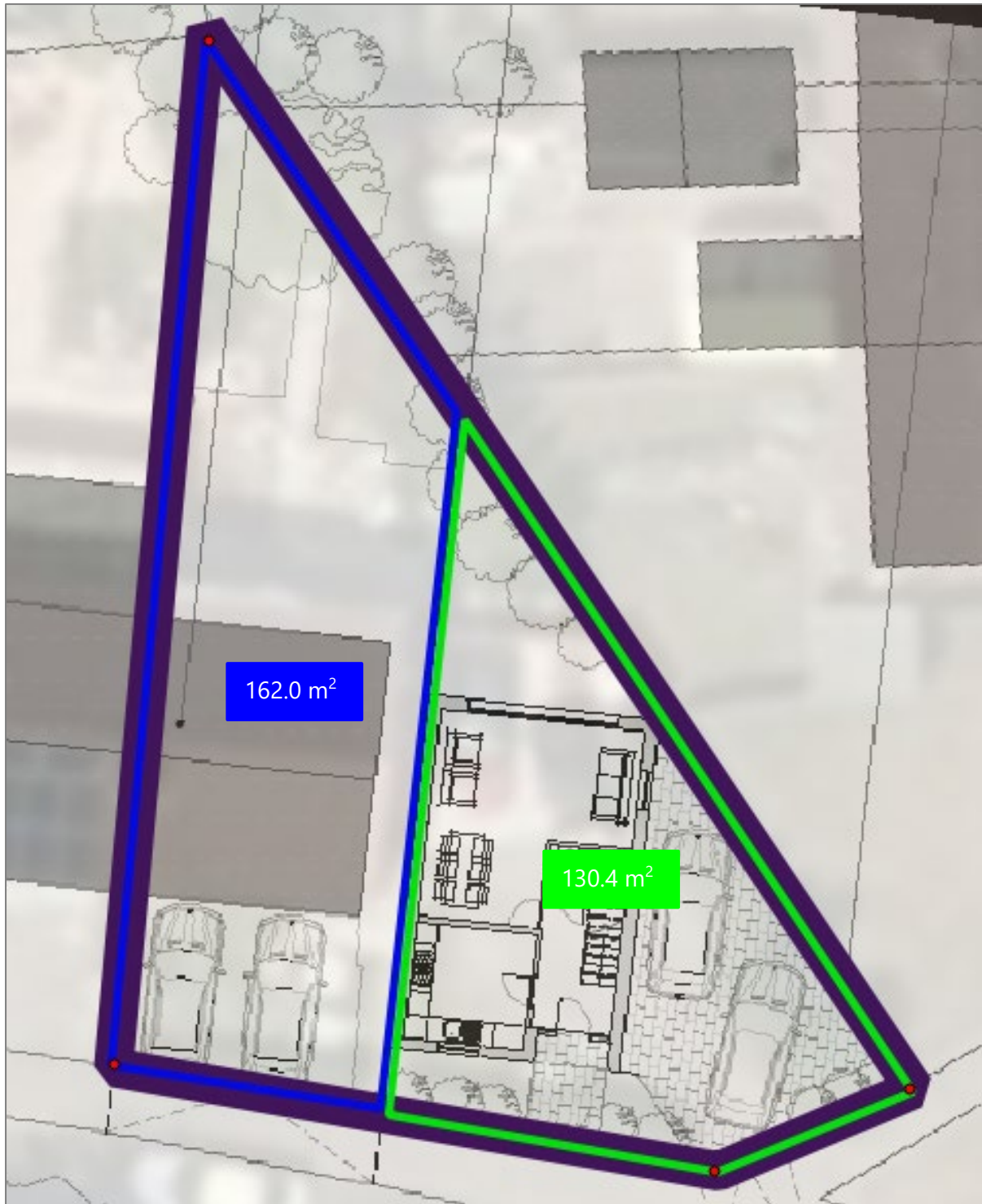
OK. HBC Accepted.

To inform the review of alternative sites in this area, various Local Plan background documents and sites identified in them have been taken into account, in particular the Strategic Housing Land Availability Assessment and the Councils Local Plan Sites Strategy Flood Risk Assessment. I accept that none of these show suitable alternative sites.

OK. HBC Accepted.

The applicant has also assessed sites allocated for development in the adopted local plan, in particular the small garage sites in Leigh Park allocated for residential development under policy L2. The application has identified one site that meets the search parameters and could be a suitable alternative; the Forestside Avenue parking area (site L146). The applicant rejects the site based on the availability of parking and potential for overlooking. However, since the site is subject to an allocation for residential development, I am unable to accept the argument that the Site is not suitable for one dwelling.

The Site area of 292.4 m² (0.0292 ha) has been used to guide the parameters of the Sequential Test search. However, the available developable area, and area proposed for development in this instance is smaller than this, at 130.4 m² (0.0130 ha).



The existing search parameters provide an allowance for a 20% increase and 20% decrease in available search area, which was considered acceptable to the Local Council.

A search area including the acceptable search parameters used, would result in parameters as follows:

Maximum: 156.5 m² (0.0156 ha) - Site area plus 20%.

Minimum: 108.6 m² (0.0108 ha) - Site area minus 20%.

The alternative Site at Forestside Avenue, which is 0.03 ha in size and has a developable area of 0.03 ha, is therefore excluded from the search parameters in this instance.

In addition, the developer only owns this Site and if they were to develop the small garage Site on Forestside Avenue would need to sell their existing Site and purchase the new Site at an inflated cost.

As well as council documentation, the applicant states that they consulted commercial property agents. This is a recommended course of action to satisfy the sequential test, particularly for small sites of less than 5 dwellings, which are less likely to be considered in strategic planning documents. The sequential test document includes no evidence that these searches took place, but having undertaken a search myself for potentially available land, I have no reason to disbelieve the conclusion that these searches yielded no results for suitable alternative sites.

OK. HBC Accepted.

Overall, I am unable to conclude that the sequential test has been passed, since a small site allocated for residential development in the defined search area has been identified as potentially suitable, but subsequently rejected.

The additional analysis of the Site and overall developable area, confirms the alternative Site at Forestside Avenue, should be excluded from being designated as a suitably alternative site. Therefore, there are no alternative sites which are suitably comparable to the Site and the Sequential Test is considered to be passed.

Exception Test

Nevertheless, I have also considered the information on the exception test. For the exception test to be passed, according to paragraph 160 of the NPPF, it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
- b) the development 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.*

I have noted the reasons given on page 24 of the applicants Sequential and Exception Test report that state that the development would satisfy part a) of the exception test. I accept that the development is an area well served by facilities and services. While this is a sustainability benefit over other sites that may not have such access, it is not a benefit that the development is providing to the community, which would outweigh the flood risk.

We would disagree, as the sustainability benefits offered to the local community, particularly at a smaller scale can be quite subjective. We have listed the sustainability benefits in the table below and explanations as to how they would add to the community:

Sustainability benefit to the community	Explanation
Reduce the housing shortfall, by boosting the supply.	Providing more homes in an existing residential area to provide greater choice to the local community who may want to stay in the area, benefitting from a more sustainable home and which is closer to schools.
Improve choice and affordability	
Sustain nearby local schools and colleges	Given the size and scale of the development this is likely to be a family home, where children could attend local nursery and schools increasing school population numbers and without the need for travel by car. This and the ability to access other local facilities would reduce the need for car travel and street parking for drop-offs, reducing air and noise pollution and parking down streets, which would benefit the local community. The reduction in greenhouse gas emissions is a major sustainability factor both in this area and nationally.
Local facilities and services (including a supermarket, station, library, and hospital) are within walking distance.	
There is a shared pedestrian cycle route within Middle Park Way, with good access to nearby amenity and nearby parkland	
Development would create a significant number of jobs, both directly and indirectly.	The development will generate employment during the construction period and ongoing maintenance period and thereby provide protection to the local economy through the employment of local building firms, who may be part of the local community, in addition local building suppliers could be used to provide building materials sourced locally to the Site. For Example, the preferred local building merchants, Covers, in Hilsea are 5 miles from the site.
Support local trades who provide services to homes.	
It should also be noted that the new proposed dwelling will be constructed to much higher environmental performance standards than much of the adjacent housing in the area.	Sustainable construction and development is a key part of local and national guidance and policy, including building regulations. The intention will be to build to an improved standard over current building regulations to

Inclusion of Sustainable Drainage Scheme (SuDS) within the proposed development to intercept surface water runoff from the Site and reduce flood risk within the wider area.	future proof the design. The intention is to do this through passive means (improved airtightness, improved insulation) - the buildings orientation is ideally suited to maximise solar gains. Sustainable construction also includes things like advanced insulation above what other properties offer in the local area and solar PV, which could be retrofitted at a later date. This would reduce heating bills and greenhouse gas emissions. It could also potentially influence others to install solar PV and increase uptake in Government schemes promoting retrofit insulation of properties, in the local area which would also support local firms. Grey water recycling tanks could be used through the inclusion of rainwater harvesting butts and toilet flushing at ground floor level.
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Further the report places strong reliance on the scheme boosting the supply of homes, sustaining local schools and creating a significant number of jobs. I do not consider that any of these sustainability benefits can be reasonably attributed to a one dwelling scheme. I am therefore unable to conclude that the exception test has been passed.

We would question why any of these sustainability benefits cannot reasonably attributed to a one dwelling scheme. It is easier to attribute a much more noticeable benefit value when discussing 20-30 dwelling schemes, but this is a scheme for just one dwelling. These are however still considered equivalent sustainability benefits to the community, and although they may be small, will contribute towards wider benefits associated with similar sized schemes.

Conclusion

Both the sequential and the exception test must be passed for the development to be considered acceptable.

The sequential test is not considered passed, as an allocated site within the search area exists, which would be suitable for this development.

The exception test is not considered passed, as it is not accepted that this one dwelling would provide wider sustainability benefits to the community that outweigh the flood risk.

The comments provided by the Council to support their statement that the Exception Test has not been passed are entirely the opinion of the officer and are highly subjective.

Based on the additional analysis of the area available for development on the Site, this would remove any suitably comparable Sites within Leigh Park, including Forestside Avenue and the Sequential Test is passed.

On the basis of the additional descriptions of sustainability benefits associated with the scheme as proposed, these are considered to outweigh the level of flood risk at the Site, where flood mitigation measures are included within the design of the development.

Overall, in the light of flood risk, I am therefore unable to support the scheme in principle.

We trust that in light of this statement, technical review and opinions provided to support the Sequential and Exception Test for 16, Selbourne Avenue (the Site), the decision of in principle support should be re-considered.

DATED:

14/05/2020

STATEMENT PREPARED BY:

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STATEMENT AUTHORISED BY:

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