

Planning Policy Comments

Application No	APP/19/01254
Address	16 Selborne Avenue, Havant, PO9 4PX
Development	Erection of 1No. 3bedroom detached dwelling (revised)
Case Officer	TP
Comments By	JB
Date of Comments	30 January 2020

I have been asked to provide comments on the sequential and exception tests for flood risk submitted in support of this application.

The applicant has provided a detailed Sequential & 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.

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.

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 Council's Local Plan Sites Strategic Flood Risk Assessment. I accept that none of these show suitable alternative sites. However, a notable omission from the test is a review if sites identified for development in the adopted Local Plan. Policy LP2 allocates a number of small garage sites in Leigh Park for residential development. The report does actually identify these sites through its review of the SHLAA, but dismisses them due to a perceived lack of information about them. They are, however, allocated for small scale development in the adopted allocations plan, and shown on the proposals map (both at www.havant.gov.uk/local-plan-allocations), they should have been considered as potential suitable alternatives for the development.

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 not results for suitable alternative sites.

Overall, since the test as not included an assessment of potentially suitable allocated sites, I am unable to conclude that the sequential test has been passed.

I have considered the information on the exception test, to cover the eventuality that the sequential test may still be passed if the applicant choses to add further information. Both the sequential and the exception test must be passed for development to be considered acceptable.

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 21 of the report that claim 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 that would outweigh the flood risk; 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.

In conclusion, it is considered that not all sources of potential alternative sites have been considered to pass the sequential test. In addition, even if the sequential test were passed, it has not been shown that the development would provide wider sustainability benefits to the community that outweigh the flood risk, and it is unlikely to be possible to demonstrate this. Overall, in the light of flood risk, I am unable to support the scheme in principle.