

## Planning Application Response of Planning Policy

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|------------------------------|------------------------------------------------------|
| <b>Application No:</b>       | APP/17/01179                                         |
| <b>Address:</b>              | 56A Bracklesham Road, Hayling Island                 |
| <b>Proposed Development:</b> | Detached dwelling with garage and off-street parking |
| <b>Case Officer:</b>         | Lewis Oliver                                         |
| <b>Comments by:</b>          | Jacqueline Boulter                                   |
| <b>Date of Comments:</b>     | 29.1.2018                                            |

### Scope of these comments:

These comments are limited to the flood risk Sequential Test only, rather than any wider policy considerations.

### Flood Risk:

The site is located within Flood Zone 3. The NPPF states that a sequential approach should be taken, and that development should not be permitted in areas at risk of flooding if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

The applicant has submitted a Sequential Test Document, which concludes that there are no sequentially preferable sites.

I agree with the applicant's assessment that what is a reasonable search area for 'reasonably available' alternative sites, is not particularly detailed in national guidance. Neither has local guidance been produced. The applicant has referenced [Bristol City Council's practice note](#). While that guide of course does not apply in Havant, I nevertheless find that it provides a sensible framework for applying the sequential test.

I agree with the applicant (and the guidance of Bristol City Council) that to be considered 'reasonably available' all the following criteria should apply:

- The site is within the agreed area of search.
- The site is of comparable size and can accommodate the requirements of the proposed development.
- The site is either:
  - owned by the applicant;
  - for sale at a fair market value; or
  - is publicly owned land that has been formally declared to be surplus and is available for purchase.
- The site is not safeguarded in the Local Plan for another use.

What I do not agree with, however, is that additional very specific criteria set by the applicant on p.11-12 of his Sequential Test document. I consider that to meet the requirements of the sequential test, the applicant should demonstrate that he is being as flexible as possible, and therefore to include a long list of criteria by which sites may be discounted does not seem appropriate.

I can see that the applicant has set out information from estate agents about available land and property on South Hayling, and has listed reasons why these are not suitable or available. I do not agree that the area of search should be restricted to South Hayling. The applicant's personal preference for South Hayling as set out in paragraph 5.3 of the Sequential Test is not relevant here. Rather, I would suggest that the whole of Hayling Island would be an appropriate area of search. The applicant claims that no alternative sites are available on North Hayling either, but has not submitted any details to substantiate this claim. These details should be provided, before the LPA can reach a conclusion on whether the sequential test has been satisfied.