

ATLAS

PLANNING GROUP

SEQUENTIAL TEST REPORT

26 Wittering Road, Hayling Island, PO11 9SP

April 2026

CONTENTS

Introduction.....	2
Site Description	3
Sequential Test Planning Policy	7
Sequential Test Methodology	9
Search Parameters for Alternative Sites	9
Location/ Geographical Area	9
Flood Risk.....	9
Availability.....	10
Initial Assessment of Sites.....	11
Geographical Area	13
No Net Increase in Dwellings	13
Availability	14
Deliverable and Developable.....	14
Commencement of Development.....	15
Other Planning Consents	15
Flood Risk.....	16
Sequential Test Remaining Sites.....	16
Sequential Test Site Analysis	18
Fathoms Reach	18
Rook Farm, Hayling Island	18
115 Elm Grove	18
Sequential Test Site Analysis Conclusion	19
Exception Test	20
Other Policy considerations	22
Conclusion	23
A	24
B	25

INTRODUCTION

- 1.1 This Sequential Test Report has been prepared by Atlas Planning Group on behalf of the applicants, Mr and Mrs Taylor, to support a full planning application for a self-build dwelling on land at 26 Wittering Road, Hayling Island. The application was submitted in February 2026 (Ref: 26/00089/FUL).
- 1.2 The site is located within the administrative area of Havant Borough Council (HBC), and it currently forms part of the residential garden associated with 26 Wittering Road.
- 1.3 According to the Environment Agency's map for flooding the site is located within Flood Zone 1, which is at the lowest risk of flooding. However, once an allowance for climate change is taken into account, the future flood risk at the site increases and according to the Council's Strategic Flood Risk Assessment (SFRA) the site is likely to move into the extent of Flood Zone 3.
- 1.4 The application submission was not supported by a Sequential Test as it is felt by the applicants that this is not necessary for the site. However, during the course of the application determination, comments from both the Policy Officer and the Case Officer have indicated that the Council have a different interpretation of the relevant policy. Therefore, at their request, a Sequential Test has been prepared for the site and is included within this Report.
- 1.5 Any site that requires a Sequential Test should also undertake the Exceptions Test set out in relevant national planning policy and guidance. As the Sequential Test has been requested it follows that an Exceptions Test should also be undertaken, and therefore this is also included within the Report.
- 1.6 This Sequential Test Report will first set out a brief description of the site and proposals, then it will discuss the policy context of the Sequential Test before moving onto the methodology undertaken. Finally, there will be an assessment of the possible identified alternative sites. As the Report will demonstrate, the Sequential Test is considered to be passed as no suitable, available, developable/deliverable alternative sites have been identified within the specified search area. Therefore, the Report will then set out the Exceptions Test and will conclude that this has also been passed for the site.

SITE DESCRIPTION

- 2.1 The application site relates to land within the garden of 26 Wittering Road. No. 26 is a detached three storey dwelling, constructed in white render. Its architecture is modern and reflective of the time in which it was built.



FIGURE 1: 26 WITTERING ROAD

- 2.2 The building is positioned on a large plot, which extends to the east and south. It is one of the largest plots along Wittering Road.
- 2.3 The application site is located within the south of the plot, and is largely rectangular in shape. It is bounded by Wittering Road to the west, residential dwellings to the north and south, and a tidal lagoon of Chichester Harbour to the east, beyond which is the Hayling Island Sailing Club. It is located in the south east of Hayling Island. The overall site extends to approximately 0.14ha.



FIGURE 2: SITE LOCATION

- 2.4 There are a number of small outbuildings located within the site which are used as sheds for storage of residential garden paraphernalia in association with 26 Wittering Road.
- 2.5 Access is provided to the site from Wittering Road in the west, utilising the existing access for 26 Wittering Road. Wittering Road is a non-adopted, residential street with mainly detached dwellings. The area has an array of character styles, including contemporary and art-deco styles, and older more traditional 1960s dwellings. The majority of houses have flat roofs, and there are many three storey buildings making use of the sea views to the east.
- 2.6 None of the buildings near to the site are listed, and it is not located within a Conservation Area.
- 2.7 Chichester Harbour, located to the east of the site, is a National Landscape (formerly Area of Outstanding Natural Beauty (AONB)). It is also protected as a Ramsar site, Special Protection Area (SPA), Site of Special Scientific Interest (SSSI), and Special Area of Conservation (SAC). There are no other nature conservation designations on or adjacent to the site.
- 2.8 The proposed development is a detached, three-bedroom, self-build dwelling with associated access, parking, hard and soft landscaping, and associated works, with an

ancillary one-bedroom carers annexe following subdivision of the plot and demolition of the existing buildings.

- 2.9 The proposed infill dwelling will sit within the centre of the new plot, maintaining an area of parking to west of the dwelling, and garden space to the east of the dwelling overlooking the Chichester Harbour National Landscape.



FIGURE 3: PROPOSED SITE LAYOUT

- 2.10 The dwelling will contain three bedrooms with en-suite facilities and storage on the ground floor, and an open-plan living area on the first floor to maximise sea views. An ancillary carers annexe is located on the ground floor to include one bedroom, living accommodation and a bathroom.
- 2.11 The proposal will allow the applicants to downsize from their existing property at 26 Wittering Road to the new dwelling. There is space within the dwelling to accommodate a lift, future-proofing the building should occupants' accessibility change. Similarly, the ancillary annexe allows for live-in carers to the property should care needs arise in the future.



FIGURE 4: PROPOSED FRONT ELEVATION

- 2.12 Access to the dwelling will be taken from the existing access off Wittering Road, with a small section of shared driveway utilised to reduce impact on the highway. A total of three parking spaces are proposed, two of which are located within the car port. There is suitable turning area within the site to allow cars to enter and leave in a forward gear.
- 2.13 The proposed dwelling has been designed with very good sustainability credentials including green roofs, an area allocated for solar PV and air source heat pumps (ASHP).
- 2.14 It has been designed to integrate into the plot, enhancing the adjacent Chichester National Landscape (formerly AONB) and take on board the comments provided at the pre-application stage. These will all be discussed in further detail below.



FIGURE 5: PROPOSED REAR ELEVATION

SEQUENTIAL TEST PLANNING POLICY

- 3.1 The National Planning Policy Framework (NPPF), revised in 2024, sets out the national policy relating to development within areas at risk of flooding.
- 3.2 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future risk), and where development is necessary in such areas it should be made safe for its lifetime without increasing flood risk elsewhere.
- 3.3 Paragraph 173 of the NPPF states that a sequential approach should be taken to individual applications, with the aim of steering new development to areas with the lowest risk of flooding from any source.
- 3.4 Paragraph 175 continues by stating that the sequential test is not required in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary would be located on an area that would be at risk of flooding from any source now and in the future (having regard to potential changes in flood risk).
- 3.5 The Planning Practice Guidance (PPG) sits alongside the NPPF and provides further guidance on how to put relevant paragraphs into practice.
- 3.6 The PPG states:

In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that **occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development** (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, **then the sequential test need not be applied.**

[Paragraph: 027 Reference ID: 7-027-20220825, Revision Date: 17/09/2025, emphasis added]

- 3.7 The Flood Risk Assessment (FRA) submitted in support of the planning application clearly states this to be the case.
- 3.8 Paragraphs 4.15 to 4.17 of the FRA states that future tidal flood risk at the site is considered to be moderate, based on the EA flood map modelling, with potential depths of up to 0.44m

in the design 2125 epoch event, but that Finished Floor Levels (FFLs) of the proposed dwelling are to be raised to a level of 4.50m AOD, meaning the development is considered to be 300mm above the maximum calculated 2125 epoch flood levels (4.20m AOD), thus the tidal flood risk to the proposed dwelling is considered to be low.

- 3.9 Furthermore, even in future climate change scenarios, the surface water flood risk at the site remains low (Paragraph 4.29 of the FRA).
- 3.10 Therefore, in accordance with the PPG, there is no requirement to undertake a Sequential Test at the site.
- 3.11 However, the Council have stated that they hold a different interpretation of national policy, and therefore have requested a Sequential Test to support the application. The guidance with the PPG has therefore been used to determine the suitable methodology for the Sequential Test process.

SEQUENTIAL TEST METHODOLOGY

SEARCH PARAMETERS FOR ALTERNATIVE SITES

- 4.1 There are three key aspects that are considered relevant when setting the search parameters for the assessment of alternative sites through the Sequential Test process, and guidance from Havant Borough Council (HBC) Officers has been given in relation to some of these:
- Location/ Geographical area over which the test is to be applied;
 - Flood risk;
 - Availability
- 4.2 The understanding of these factors is set out below.

LOCATION/ GEOGRAPHICAL AREA

- 4.3 The PPG states that for individual planning applications *“the area to which the test needs to be applied will be governed by local circumstances relating to the catchment area for the type of development proposed and the needs it is proposing to address. The catchment area should always be appropriate to the nature and scale of the proposal and the settlement it is proposed for”* (Paragraph 027a Reference ID: 7-027a-20220825, revision date: 17/09/2025).
- 4.4 The Council have confirmed that the necessary site search area should include Hayling Island and no other areas within the Havant Borough.

FLOOD RISK

- 4.5 As the crux of the Sequential Test is to steer development towards areas of lowest or lower flood risk only those sites which were considered to be of lower flood risk could be considered as sequentially preferable to the application site.
- 4.6 The site is currently located in Flood Zone 1, so any site located in current Flood Zones 2 or 3 should be excluded from assessment.
- 4.7 The site is anticipated to be in Flood Zone 3 in the future, taking into account the effects of climate change, and therefore any site which will also be located in Flood Zone 3 in the future should be excluded from assessment as it is not sequentially preferable.

- 4.8 Finally, the site is not subject to any other sources of flood risk, including surface water flooding both now and in the future. Therefore, any site which is subject to any other source of flooding either now or in the future should be excluded from assessment.

AVAILABILITY

- 4.9 The definition of availability in the PPG has been updated a number of the times in the last five years, with particular inclusions relating to what should be considered an available site.

- 4.10 The PPG now states:

Sites should be considered 'reasonably available' for the purposes of the sequential test if their location is suitable for the type of development proposed, they are able to meet the same development needs and they have a reasonable prospect of being developed at the same time as the proposal.

In considering whether alternative lower-risk sites (which could, where relevant, be a series of two or more smaller sites) would be capable of accommodating the proposed development, such alternative sites do not need to be owned by the applicant to be considered 'reasonably available'.

[Paragraph: 028 Reference ID: 7-028-20220825, Revision Date: 17/09/2025]

- 4.11 For an alternative site to be considered 'reasonably available' the PPG confirms that that they do not need to be owned by the applicant, however it is rational to assume that they should be available for the development proposed. In other words it must be available for purchase by the applicant to be developed into the proposal, or there must be a reasonable prospect that the current owner of the land will develop the land on the same terms as the proposed development. Therefore, for instance, if a site was owned by a private individual/ body who was unwilling to sell the site to the applicant and unwilling to develop the site on the same terms as the proposal, then it could not be considered 'reasonably available'.

INITIAL ASSESSMENT OF SITES

- 5.1 A number of sources were considered in the collection of all potential development sites in Hayling Island. These sources went as far as practically and reasonably possible to establish suitable alternative sites for the proposed development, and included:
- Havant Borough Council Five Year Housing Land Supply Statement (December 2025)
 - Havant Borough Council Brownfield Land Register (December 2025)
 - Havant Borough Council Strategic Housing and Economic Land Availability Assessment (SHELAA)(February 2026)
 - Rightmove Residential (accessed April 2026)
 - Rightmove Commercial (accessed April 2026)
 - Local Agents websites (accessed April 2026)
- 5.2 These sources include a number of formal documents published by the Council which include known sites, usually those promoted for development by interested parties, or those which have achieved planning consent for residential development in recent years.
- 5.3 In order to ensure that any windfall sites were also picked up within the search, a review of commercial sources such as Rightmove and local land/estate agents websites was undertaken.
- 5.4 The sources provided the following number of sites:

Source	Number of sites
Five Year Housing Land Supply Statement	26
Brownfield Land Register	66
SHELAA	76
Rightmove (residential and commercial pages)	153
TOTAL	321

5.5 The following local agents websites were used to search for any additional properties:

- Fine and Country
- Hayling Property
- Hugh Hickman and Son
- Morris Dibben
- Geoff Foot Estate Agents
- Arden and Way
- Henry Adams
- Savills

5.6 However, all of the properties found within the relevant search area were already included within the Rightmove results.

5.7 Additionally, a search was undertaken of the following sites to determine if there were any areas of development land advertised for sale:

- Plot Finder
- Savills
- Henry Adams
- Symonds and Sampson
- Vail Williams
- Bruton Knowles
- Knight Frank

5.8 No land was identified for sale on the majority of these sites, other than one site with planning consent which was already identified through the Rightmove commercial search.

5.9 Once all of the sources were collated into a single spreadsheet it was apparent that there were a number of sites which were included in more than one of the Council documents, for example many of the sites on the Brownfield Land Register had also been assessed within

the SHELAA. A total of 28 duplicates were found, therefore overall a total of **293 individual sites were identified across the various sources.**

5.10 Information on all the sites identified can be found within Appendix A.

GEOGRAPHICAL AREA

5.11 As agreed with Havant Borough Council (HBC) Officers, only sites within Hayling Island should be considered within the Sequential Test. Of the above lists, 14 sites on the Brownfield Land Register, 2 sites in the Five Year Housing Land Supply Report and 23 sites in the SHELAA were located in Hayling Island (with some of these 39 sites occurring on more than one of the Council documents).

5.12 All of the sites within the Rightmove search (and accompany local agents search) were located in Hayling Island.

5.13 Therefore, of the identified sites, a total of 192 sites are located in Hayling Island.

NO NET INCREASE IN DWELLINGS

5.14 All of the sites contained within the Five Year Housing Land Supply Statement, the SHELAA and the Brownfield Land Register would result in a net increase of at least one dwelling following development, and therefore none from these lists are discounted at this stage.

5.15 The Rightmove search (and associated local agents search) identified any site for sale in the areas of Hayling Island outside of the future flood zone. These included residential dwellings, and commercial buildings and land. Of the search results only 5 results were identified as suitable for residential development, as none of the others had sufficient capacity to accommodate an additional dwelling at the site.

5.16 Of these five sites, one had consent for a replacement house but was currently occupied by a dwelling and one already had three residential caravans, therefore a residential development of these sites would not result in a net increase of at least one dwelling. The remaining two sites had sufficient land for an additional dwelling at the front of the property, but it would not be suitable in design and policy terms as a new dwelling would have a detrimental effect on amenity, access and parking, and design and layout in all cases, with heritage also a consideration at one of the properties which was listed.

5.17 Therefore, it was established that none of the sites identified within the Rightmove search (or associated local agents search) would provide sufficient capacity to accommodate the proposed development of one additional dwelling. Therefore, all were discounted.

5.18 As a result, the potential 192 sites are reduced to 39.

AVAILABILITY

5.19 In accordance with the National Planning Policy Framework (NPPF)(2024), it must be demonstrated that there are no reasonably available sites for the proposed development areas with a lower probability of flooding.

DELIVERABLE AND DEVELOPABLE

5.20 As stated, in order to be considered a suitable alternative, the PPG states that: “*Sites should be considered ‘reasonably available’ for the purposes of the sequential test if their location is suitable for the type of development proposed, **they are able to meet the same development needs and they have a reasonable prospect of being developed at the same time as the proposal***” (emphasis added).

5.21 The NPPF Glossary states: “*To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

5.22 And also states:

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 5.23 The SHELAA has utilised this definition in assessing the deliverability of the sites put forward for development. Of those in Hayling Island, the Report concludes that only 10 are considered to be developable, taking into account matters such as land ownership, site constraints, and local policies. As there is no evidence that the remaining sites could come forward for the delivery of dwellings they have been discounted from the Sequential Test.
- 5.24 As a result, the potential 39 sites are reduced to 19.

COMMENCEMENT OF DEVELOPMENT

- 5.25 It is considered that any site which has commenced residential development should not be considered available as an alternative to the application site.
- 5.26 Based on the information contained within both the Five Year Housing Land Supply Update Report and the SHELAA the sites at 380 Sea Front, 44-54 West Street, 5-7 Station Road, Manor Nurseries, The Rotunda, Yacht Haven and 108-110 Elm Grove have all completed their respective residential developments. These sites are therefore discounted from the Sequential Test.
- 5.27 Similarly, the site at Sinah Lane (Ref: 20/01093) has commenced development, with dwellings occupied at the site since early 2023. Due to the advanced stage of its completion this cannot any longer be considered as available and has therefore been discounted.
- 5.28 As a result, the potential 19 sites are reduced to 11.

OTHER PLANNING CONSENTS

- 5.29 One site within the Council's Five Year Housing Land Supply Update Report was for the delivery of Older Persons' Housing. The site at Cheybassa Lodge, 2 Chichester Avenue (Ref: APP/19/00466) has consent for extensions and alterations to a car home to provide additional bedrooms.
- 5.30 Additionally, one site within the SHELAA is for tourist/holiday accommodation. The site at the Hayling Island Holiday Park has no planning permission for residential dwellings, and the latest planning history at the site solely relates to the location/re-location of caravans. These consents have conditions restricting residency of the units to only 10 out of the 12 months in any given year. Although the SHELAA also makes reference to a residential planning application at the site, submitted by Taylor Wimpey in 2022 (Ref: APP/22/00001) this has

been disposed, and therefore there is no evidence that residential development is being sought for the site beyond the recent caravan consents.

5.31 As neither of these sites/consents relate to new C3 residential development they cannot be considered as suitable, available, deliverable or developable alternatives and therefore they were discounted from the Sequential Test.

5.32 As a result, the potential 11 sites are reduced to 9.

FLOOD RISK

5.33 A number of the sites were located in areas of future flood risk, most particularly future flood zone 3, meaning they were not sequentially preferable to the application site. These have therefore been discounted from the search.

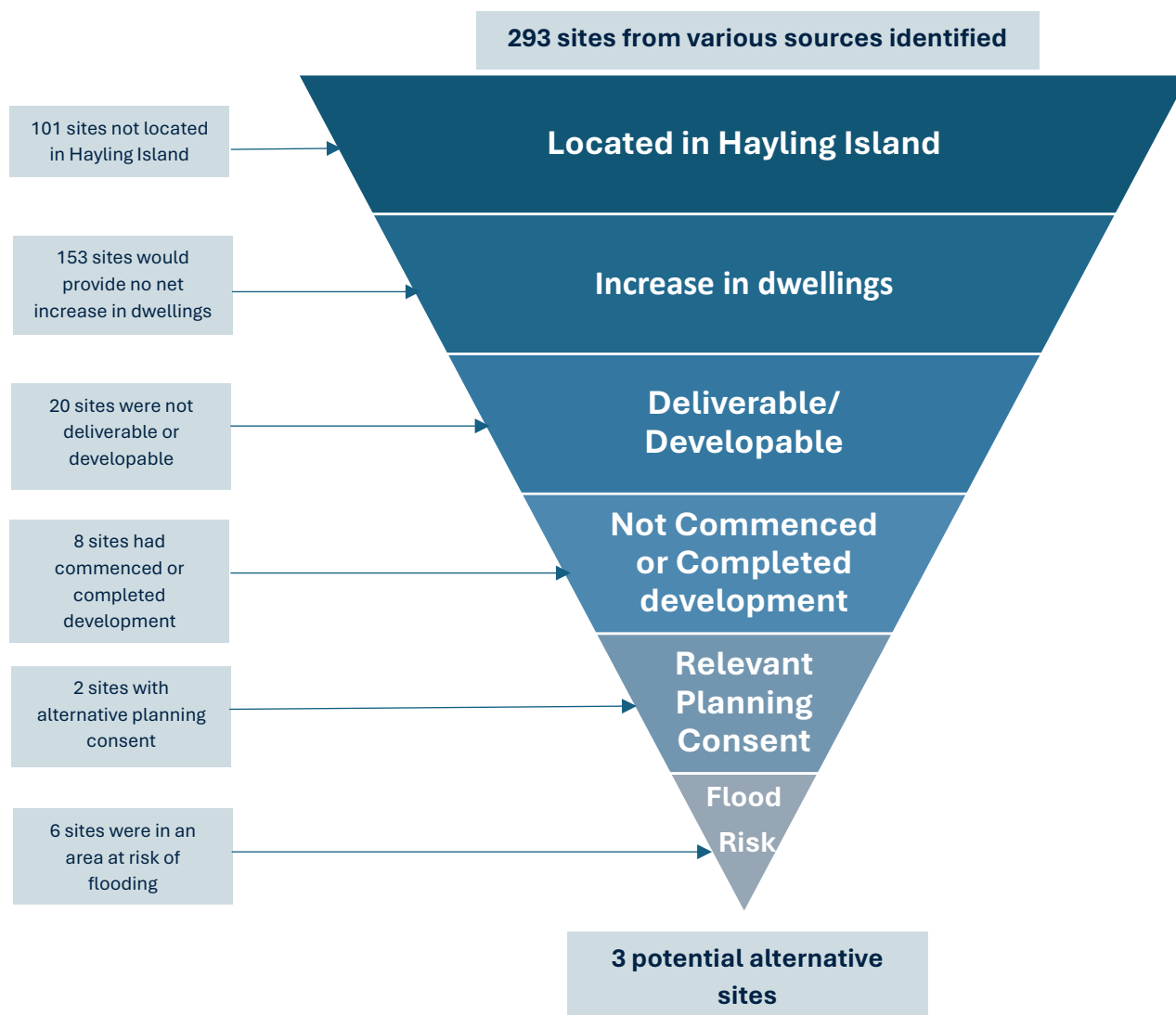
5.34 As a result, the potential 9 sites are reduced to 3.

SEQUENTIAL TEST REMAINING SITES

5.35 In total 293 sites were found and assessed as part of the Sequential Test search.

5.36 290 of these sites have been discounted. These have included:

- Sites not located within Hayling Island
- Sites that would not result in a net increase of one dwelling
- Sites that are not deliverable or developable according to the Council's assessment
- Sites that have commenced or completed development
- Sites with consent for alternative uses (not Use Class C3)
- Sites in an area of similar or worse flood risk either now or in the future



5.37 Therefore, following the initial assessment of sites, 3 identified sites were found to be potential alternatives based on the location and current planning consents or opportunities.

5.38 These 3 sites are:

Reference	Site Address	Size/ Capacity
HI15	Fathoms Reach	51
HI16	Rook Farm	300
HI17	115 Elm Grove	7

5.39 The potential for these sites to provide a suitable alternative to the proposed development site will be assessed within the next section of this Report.

SEQUENTIAL TEST SITE ANALYSIS

- 6.1 In order to consider if any of the remaining 3 sites could be considered as reasonably available alternatives to the proposed development in accordance with the requirements and definitions of the Planning Practice Guidance (PPG), it is important to look at the potential for these sites to deliver the proposed development and their availability.

FATHOMS REACH

- 6.2 The site at Fathoms Reach was assessed as a potentially achievable development site through the SHELAA with a site area of 1.74ha and a potential capacity of around 51 dwellings.
- 6.3 In 2022 a planning application was submitted for the demolition of Nos. 61-69 Fathoms Reach and the development of 51 dwellings (Ref: APP/22/00001). However, this application was disposed in February 2026.
- 6.4 Therefore, at this time there is no planning consent for residential development at the site and it cannot be considered developable or deliverable in accordance with the definitions of the NPPF.
- 6.5 The site has therefore been discounted from the Sequential Test.

ROOK FARM, HAYLING ISLAND

- 6.6 The site at Rook Farm was assessed as a potentially achievable development site through the SHELAA with a site area of 11.77ha and potential capacity of around 300 dwellings.
- 6.7 An application for 300 dwellings at the site was submitted in 2021 (Ref: APP/21/01434), however no decision has been made on this application to date. Instead, an Appeal has been submitted against non-determination (Appeal Ref: 6004299). An 8-day Inquiry is due to be held in late June 2026. Therefore, at this time there is no planning consent for residential development at the site, and as the outcome of the Inquiry is not known, the site cannot be considered developable or deliverable in accordance with the definitions of the NPPF.
- 6.8 The site has therefore been discounted from the Sequential Test.

115 ELM GROVE

- 6.9 The site at 115 Elm Grove received full planning permission for conversion of the business premises at the site to 7 one bedroom flats.

- 6.10 The development has not commenced, and the site is still occupied by a business.
- 6.11 As can clearly seen by the description of the proposed development at 115 Elm Grove and the application site, the proposals will deliver significantly different dwelling types.
- 6.12 The seven properties at 115 Elm Grove will be one-bedroom apartments anticipated to be available on the open market, where as the application proposal is for a three-bedroom house with integrated carers annexe, and most importantly is a self-build property.
- 6.13 As stated, the PPG states (emphasis added):

*Sites should be considered ‘reasonably available’ for the purposes of the sequential test if their location is suitable for the **type of development proposed**, they are able to meet the **same development needs** and they have a reasonable prospect of being developed at the same time as the proposal.*

- 6.14 The delivery of 7 one-bedroom apartments will clearly not deliver the type of development proposed at the application site nor meet the same development needs of a self-build dwelling, therefore this site has been discounted from the Sequential Test.

SEQUENTIAL TEST SITE ANALYSIS CONCLUSION

- 6.15 As set out only one of the three identified sites has a live planning consent with the potential for delivery, and this is for a different type of development proposed which will not meet the same development needs as the application. Therefore, all three of the remaining sites have been discounted from the Sequential Test. As such, the Sequential Test is passed.

EXCEPTION TEST

7.1 A proposal having passed the Sequential Test also needs to pass the Exception Test. This is a method to demonstrate that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where sites at lower risk of flooding are not available.

7.2 The NPPF Paragraph 178 states:

To pass the exception test 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.

7.3 The development will clearly provide wider sustainability benefits to that outweigh the flood risk.

7.4 Firstly, the development is sustainably located within the settlement boundary close to the services and facilities of Hayling Island. It is not in an isolated or unsustainable location, and therefore will work to achieve the Council's objectives of supporting sustainable development.

7.5 Secondly, the proposal is for a net additional dwelling at a time when the Council cannot currently demonstrate the required housing land supply. The latest Five Year Housing Land Supply Update Report, published by the Council in December 2025 confirms HBC can currently only demonstrate a supply of **1.6 years**. This is a serious and substantial deficit, and therefore the benefit that even individual houses can make to this supply should be given great weight.

7.6 Finally, the proposal is specifically for a self-build dwelling, helping the Council to achieve its requirement to deliver an annual supply of custom and self-build dwellings. The house will have a number of sustainable features, with high quality design and materials adding to the

character of the area. Therefore, overall there will be a number of benefits of the scheme ensuring that criterion a of the Exception Test is passed.

- 7.7 The Flood Risk Assessment (FRA) submitted alongside the planning application confirms that the development will be safe for its lifetime taking account of the vulnerability of its users without increasing flood risk elsewhere. Therefore criterion b of the Exception Test is passed.
- 7.8 Overall, the development as passed both the Sequential and Exception Test in accordance with the requirements of the NPPF and PPG.

OTHER POLICY CONSIDERATIONS

- 8.1 As set out earlier within this Report, the Applicant does not consider that the Sequential Test is required for the proposed development due to the changes to the PPG in 2205. However, as it has been requested by the Council, this has been undertaken and passed.
- 8.2 It should be noted, however, that recent case law has also indicated that even should a site fail the Sequential Test this should not preclude development.
- 8.3 A planning appeal in Faversham, Kent, was allowed in June 2025 which demonstrates this position (Appeal Ref: APP/V2255/W/24/3350524)(Decision included in Appendix B).
- 8.4 The proposal was for the erection of up to 250 dwellings, including affordable housing, public open space, landscaping, drainage, and access. The appeal site is located close to the coast, and therefore tidal flooding was a relevant consideration. Though it was not at risk of present flooding, future scenarios indicated there would be flooding to some of the areas proposed for residential development.
- 8.5 A sequential test was not undertaken by the Appellant, which the Inspector noted was, at the time, in conflict with the NPPF.
- 8.6 However, Paragraph 25 of the Appeal decision confirms that *“there is no real world harm from either the failure to undertake the sequential test for tidal flooding or the failure to properly undertake the sequential approach. This is because it has been satisfactorily demonstrated that mitigation measures can make the proposed development safe for its lifetime from tidal flooding”*. Therefore despite it being stated the development represented an unacceptable form of development having regard to its location within a future flood zone, on balance the appeal was allowed.
- 8.7 This demonstrates that even in an instance where a Sequential Test has not been undertaken, other matters such as the mitigation measures proposed and the real-world impacts of the proposal can still result in granting of planning permission.
- 8.8 Whilst this is not relevant to the current application, as the Sequential Test has been passed, it is relevant to consider that the benefits of the development should be viewed as a whole rather than solely focussing on the location of the site within an area at risk of future flooding.

CONCLUSION

- 9.1 This Statement has set out that the recent changes to the Planning Practice Guidance (PPG) no longer require for the Sequential Test to be provided at the site for the proposed development as it will be safe from flooding.
- 9.2 However, it has been specifically requested by both the Case Officer and Policy Officer that a Test is undertaken. Therefore, a full search was undertaken to complete the Sequential Test.
- 9.3 The search identified a total of 293 sites which was reduced to only three sites when the following matters were considered:
- Location in Hayling Island only;
 - Must provide a net increase of one dwelling;
 - Must be developable and deliverable;
 - Has not already commenced or been completed;
 - Is for C3 residential consent; and
 - Is not in an area of the same or worse flood risk.
- 9.4 Of the three sites remaining, two had no planning consent and therefore there was no certainty as to their delivery. The remaining site had consent for a development which was substantially different to that sought from the application, therefore in accordance with the definition within the PPG it could not be considered a reasonable alternative. For this reason the Sequential Test at the site is passed.
- 9.5 The Exception Test demonstrated that there were a number of benefits of the proposal, most specifically delivering a dwelling when the Council has a land supply of only 1.6 years, and that the proposal will not increase flood risk elsewhere whilst remaining safe for its lifetime. Therefore, the Exception Test at the site is also passed.

A

B