Flood Risk Sequential Test for Residential Development

05/14

Land at Peterborough Road, Crowland



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1 Introduction

1.1 This report considers proposals for residential development on land at Peterborough Road, Crowland, in the context of the flood risk sequential test required by the National Planning Policy Framework (NPPF). The report has been prepared on behalf of the Applicant, Ashley King Developments.

1.2 The application site lies to the west of Peterborough Road, and south of Harvester Way. It is immediately adjacent the edge of the settlement, as defined both by built development and the boundary shown on the adopted Local Plan Proposals Map.

1.3 The proposed development is for 49 new homes, of which 14 would comprise affordable housing. This housing would meet an identified need. This need is immediate, as there is not currently a 5 year housing land supply in South Holland District. It would also help to meet a longer-term strategic need for housing in Crowland, identified in the emerging South East Lincolnshire Local Plan.

1.4 The site is located within Flood Zone 3a, as defined by the Environment Agency's flood map. It lies outside the functional flood plain, and so the NPPF allows for residential development to take place, subject to it having passed the sequential and exceptions tests. The sequential test requires that the development is necessary, and that there should not be other reasonably available sites which are more favourably located with regard to flood risk, and which could meet this need. This matter is considered in this report, while the exception test is addressed separately in a Flood Risk Assessment by Geoff Beel Consultancy, which also accompanies this application.

2 Planning Policy Context

2.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan for South Holland is formed by the saved policies of the South Holland Local Plan (2006). In addition, the National Planning Policy Framework (NPPF) sets national planning policy, and forms a material consideration with relevance to planning decision making.

2.2 Annex 1 of the NPPF concerns the implementation of its policy guidance. Within this section, paragraph 214 implies that Local Plans which have not been adopted since the NPPF's publication (March 2012) should now be considered out of date. In this context, paragraph 215 goes on to state that **'due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).'** It is therefore clear that for the purposes of determining this planning application the policy guidance in the NPPF is of the greatest importance.

2.3 It is also relevant to note that the NPPF gives great weight to the need to **'boost significantly the supply of housing'** (paragraph 47) and it requires the provision of a rolling 5 year housing land supply, plus a buffer of 5% or 20% to ensure competition in the market. Where such a provision is not in place, **'relevant policies for the supply of housing should not be considered up-to-date.'** Proposals for residential development should also be **'considered in the context of the presumption in favour of residential development'** (both paragraph 49). New Local Plans should, as far as possible, meet **'the full objectively assessed needs for market and affordable housing in the housing market area.'**

2.4 With regard to proposals for development in areas adjudged to be at risk of flooding, the NPPF sets out the following guidance:

> **100. 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere…**

101. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.

102. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate.'

2.5 The NPPF Technical Guidance sets out the procedure for directing suitable locations for development, in accordance with the sequential and exceptions tests. This clarifies that Flood Zone 1, being at the lowest risk of fluvial flooding, is the starting point for the sequential approach, followed by sites in Flood Zones 2 and then 3. It also specifies that a sequential test should be based on a Strategic Flood Risk Assessment. The technical guidance goes on to state the following:

5. 'The overall aim should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, local planning authorities allocating land in local plans or determining planning applications for development at any particular location should take into account the flood risk vulnerability of land uses (see table 2) and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required (see table 3). Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.'

2.6 Table 2 within the Technical Guidance defines residential development as a **'more vulnerable'** use. Table 3 confirms that this type of development is acceptable within Flood Zone 3a, subject to its having passed the sequential and exceptions tests.

2.7 When considering the policies of the NPPF, it is important to consider its guidance in its totality. With regard to the sequential test, it is clear that an understanding must first be gained of whether a development is **necessary** (NPPF, paragraph 100), and this is why it is relevant to consider the NPPF's guidance with regard to residential development, set out above. Evidence in relation to the need for housing, and the contribution which these proposals would make, is set out in Section 3 below.

2.8 Following this, the sequential test requires a consideration of reasonably available sites. The Council are the arbiters of the sequential test, and so we have discussed the scope within which sites should be considered with the Council's Development Manager. This has clarified that the Council would consider sites in and around Crowland when applying the sequential test to these application proposals. Following discussions with the Council's Planning Policy department we have ascertained that the Draft Strategic Housing Land Availability Assessment (SHLAA), dated 2012, forms the most up to date assessment of reasonably available sites for residential development around the town, and contains all of the reasonably available sites that they are currently aware of in Crowland. We have therefore considered the potential which the sites identified in the SHLAA have to meet the need for residential development, and their relative favourability with regard to the sequential test, when judged against the application site. This assessment is set out in Section 4.

3 The Need for Residential Development

3.1 As noted above, paragraph 100 of the NPPF allows for development to be accommodated within Flood Zones 2 and 3, where it can be shown that the development is necessary, and subject to the sequential and exception tests.

Settlement Hierarchy

3.2 Policy SG3 of the adopted South Holland Local Plan (2006) identifies Crowland as an Area Centre, the second tier within the settlement hierarchy after the Main Town of Spalding. The Policy states that Area Centres **'will continue to provide for housing, employment and commercial development to support their roles as service centres for surrounding rural areas.'** Crowland therefore has an important role to play in the provision of housing within the District, as it is one of only 5 Area Centres, providing housing not only for the need arising within the town itself, but also in a wider rural hinterland.

3.3 The emerging South East Lincolnshire Local Plan (May 2013) takes a similar approach, identifying Crowland as Main Service Centre, again in the second tier of the settlement hierarchy within the District, after the Sub-Regional Centre of Spalding.

Housing Target

3.4 It is relevant to note that, when developing policy options for the new Local Plan, paragraph 4.7.2 of the emerging Local Plan concluded that it would not be reasonable to consider a policy option which sought only to provide housing on land at the lowest risk of flooding, within Flood Zone 1, as this would be likely to lead to a fundamental challenge to the Local Plan, on the basis that it would fail to meet housing need.

3.5 This draft Local Plan recommended a housing target of 470 dwellings per annum, on the basis that this was considered achievable when compared against previous housing delivery rates. However, the Council's evidence had indicated that higher migration-led dwelling forecasts may be preferable. Whilst these potential housing targets had originally been rejected as options, as they were not considered deliverable, we understand that the Council have since reconsidered this stance.

As a consequence, the Council are now seeking to provide an annual average of 558 dwellings per annum, and this is the basis on which they have calculated their housing land supply. As this is the most up to date housing target available, we have used it as a basis for this report.

3.6 With regard to affordable housing, we also note that the latest draft Peterborough Sub-Region Strategic Housing Market Assessment, published March 2014 (referred to as the SHMA) indicates a very high level of need. Table 47 of the SHMA indicates that there is a need for 521 affordable homes each year throughout the new Local Plan period, to 2036. This is nearly as high a number as the Council's overall housing target, and so it is not a realistically deliverable target. As the proposed housing target will not meet affordable housing needs, any provision that can be made towards this need is of great value.

Housing Land Supply

3.7 The Council's published housing land supply[1] sets out the following conclusions:

A	Housing target for plan period (2011 – 2036)	13950
B	Annual housing target across plan period (A / 25 years)	558
C	Five year supply target, no adjustment (B x 5)	2790
D	Shortfall in housing provision from earlier in plan period (requirement less completions)	1054
E	Five year supply target incorporating shortfall (C + D)	3844
F	Buffer (5% or 20%)	769
G	Five year supply incorporating buffer (E + F)	4613
H	Annual target for next five years (G / 5)	923
I	Current deliverable supply 2014/15 – 2018/19	2675
J	Gap (G – I)	1938
K	**Council's housing land supply equivalent to (I / H)**	**2.9 years**

[1] See *NPPF 6 Year Housing Land Supply Assessment for South Holland District as at 31 March 2014*, South Holland District Council (2014), available at http://southeastlincslocalplan.org/housing/.

3.8 Therefore, on the basis of the Council's own calculations, there is a shortfall in the current housing land supply of 2.1 years, equivalent to 1,938 dwellings. This shortfall applies across the District, and the guidance in the NPPF noted in Section 2 states that it implies policies for the supply of housing should be considered of date. This effectively means that policies which seek to restrict residential development to the defined limits of settlement boundaries are out of date, and should be accorded relatively little weight, when considered against the importance which the NPPF paces on meeting housing need. Therefore, sites such as the application site may be considered suitable locations for residential development.

3.9 We also note that the Council's housing land supply assessment sets out the details of each of the sites from which housing is expected to be delivered within the 5 year period. This includes a supply of only 34 dwellings in Crowland.

Housing Target for Crowland

3.10 The wider policy guidance in the NPPF supports development in sustainable locations, with good access to public transport and local services and facilities, as noted in the Planning Statement by Studio 11 Architecture which accompanies this application. In this regard the policies of the adopted Local Plan relating to settlement hierarchy remain consistent with the policy approach advocated by the NPPF, and they can be accorded full weight. Crowland is one of the most sustainable locations for development within the District, as reflected in its identification within the second tier of the settlement hierarchy within the adopted and emerging Local Plans.

3.11 The emerging Local Plan proposed to allocate 300 dwellings to be delivered in Crowland in the period 2011-2031, on the basis that this was around 3% (actually around 3.2%) of the overall housing requirement and therefore consistent with past delivery trends. If this level of growth is increased in proportion with the new higher housing target that the Council are now seeking to meet, and the longer plan period now referenced in the Council's 5 year land supply assessment (to 2036, in accordance with the SHMA's calculations), the target for Crowland in the period 2011-2036 would increase to up to 450 dwellings.

3.12 The evidence of potential housing land in Crowland on which the emerging Local Plan is based is formed by the 2012 SHLAA. This contains Officers' assessment of

the availability, achievability and suitability of sites which have been promoted for development, in accordance with the requirements of the NPPF (see NPPF, footnote 11) and the SHLAA Practice Guidance (DCLG, 2007). The conclusions of the SHLAA must therefore also be read in conjunction with the initial conclusions of the emerging Local Plan, which were that the proposal to allocate 3% of the overall level of housing growth proposed in Crowland (300 dwellings) **'is supported by evidence of available sites in the SHLAA'**[2].

Discussion

3.13 The evidence noted above demonstrates that there is a substantial need for housing across the District in the short-term, and that the NPPF places considerable importance on meeting this shortfall. It is also clear that there is an identified need for a substantial quantum of residential development, potentially in the region of up to 450 dwellings, to meet the identified future need for housing in Crowland. The emerging Local Plan has also already concluded that it would not be reasonable to seek to restrict residential development only to land within Flood Zone 1, as this would fail to meet housing need.

3.14 The proposed development would provide 49 dwellings, a number which we believe represents a significant and valuable contribution to meeting local housing need in Crowland. It would more than double the number of dwellings which would be delivered in Crowland within the next 5 years, under the available supply.

3.15 The proposals would also provide 16 affordable homes, which is 33% of the total number proposed, consistent with the requirements of the adopted Local Plan (Policy HS8) and the emerging Local Plan. As noted above, the need for affordable housing is significantly greater than could be met by the Council's proposed housing target, and so this provision will be of great value in providing housing for those in the greatest need.

3.16 We therefore believe it is clear that there is a demonstrable need for housing in Crowland. As such, the residential development proposed by this application is necessary, and meets the test at NPPF paragraph 100.

[2] Draft South East Lincolnshire Local Plan, May 2013, paragraph 6.39.1

4 Consideration of Potential Development Sites

4.1 As noted in Section 2 above, we have defined the parameters of our assessment of sites to Crowland, following discussion with the Council's Development Manager. We have also confined our assessment of potential sites to those identified by the Council in their draft Strategic Housing Land Availability Assessment (SHLAA) 2012, following discussion with the Council's Planning Policy department. The sites in the SHLAA have been identified following public consultation, and so they represent the most robust possible selection of land which is currently available for residential development. Council Officers have informed us that although the SHLAA was last published in 2012, the same sites populate the latest draft, which is to be released later in 2014.

Consideration of SHLAA Sites in Relation to Flood Risk

4.2 The sites identified in the SHLAA are shown on Drawings 1299/01 and 1299/02. Drawing 1299/01 shows the sites in relation to the Environment Agency's flood map, which identifies the majority of the sites identified in the SHLAA as falling within Flood Zone 3a. This flood map forms the starting point for carrying out a sequential test, and is included here for completeness. It indicates that only part of site Cro09 lies within Flood Zone 1, while much of site Cro18 and all of Cro20 lie within Flood Zone 2, and the remainder of the sites all lie either entirely or mostly within Flood Zone 3.

4.3 Drawing 1299/02 shows the SHLAA sites in relation to the Council's Strategic Flood Risk Assessment (SFRA) from 2010. This is a more refined assessment of flood risk, and the NPPF and its technical guidance indicate that where available the SFRA should be the basis for undertaking the sequential test. This drawing indicates that a larger part of the area surrounding the town is within Flood Zone 1, and so at a lower risk of flooding. Site Cro09 is now shown as lying within Flood Zone 3. Meanwhile, sites Cro02, Cro11, Cro13, Cro18 and Cro20 are now shown as lying entirely within Flood Zone 1, while sites Cro03, Cro05 and Cro06 are now partly within Flood Zone 1.

4.4 The SFRA therefore indicates that fewer of the potential SHLAA sites are at risk of flooding. Using the figures in the SHLAA, the sites within Flood Zone 1 appear capable of delivering around 250 dwellings. This includes a partial contribution

from the sites mentioned above, which are partly within Flood Zone 3. We have omitted sites Cro01 or Cro21 from this assessment, because as the SHLAA concludes, they are isolated from Crowland and instead within the countryside, effectively unrelated to any existing settlement.

4.5 Whilst we do not believe that all of these sites are realistic options for residential development, as explained below, it is still clear that even if they were, they would be unable to provide the level of housing required by the new Local Plan, whether this is 300 or 450 dwellings. This demonstrates that it will be necessary in any case to allocate land for residential development within Flood Zone 3.

Further Material Planning Considerations

4.6 The Council's assessment of the SHLAA sites considered a broader range of planning criteria to flood risk alone. This assessment is summarised in the table below, which shows that only three of the sites are considered by the SHLAA to be available, achievable and suitable, and that these three sites could between them deliver only 73 dwellings. Considering these figures in the context of the emerging Local Plan, it is also clear than a number of SHLAA sites will be required which do not meet the Council's assessment of being available, achievable and suitable sites.

4.7 The table below considers broader planning considerations such as landscape impact, as well as the issues of availability and deliverability considered by the SHLAA. It takes the SHLAA assessment further by considering the sites in the context of their suitability for development immediately. We have categorised any site which is not immediately available as being currently undevelopable. We have also concluded that any sites which are not adjacent to the existing urban area would not be suitable for development, as they would either be remote from the settlement, or would be likely to create pressure on the intervening land for development. In other cases, our assessment below responds directly to the Council's own assessment in their SHLAA.

	SHLAA Conclusion						JBPA Conclusion	
Site	**Available**	**Achievable**	**Suitable**	**Classification**	**No. of Dwellings**	**Flood Zone (SFRA)**	**Notes**	**JBPA Classification**
Cro01	Yes	Yes	No	Undevelopable	122	Mixed 1 and 3	Not connected to edge of settlement.	Undevelopable
Cro02	Yes	Yes	Yes	Developable	37	1	Reasonably well related to the settlement and offers a realistic prospect for development.	Developable
Cro03	Yes	Yes	No	Undevelopable	135	Mixed 1 and 3	Would extend Crowland to the east of the A16, in a highly visible location. Significant adverse landscape impact and poorly related to the form of the existing settlement. Former A16 would also form a barrier to pedestrian movement.	Undevelopable.
Cro04	No	Yes	No	Undevelopable	34	3	Site is not available.	Undevelopable
Cro05	Yes	Yes	No	Undevelopable	33	Mixed 1 and 3	The site contains allotments, the loss of which would exacerbate an existing shortfall in open space. Site is also not available in the short-term.	Undevelopable
Cro06	Yes	Yes	No	Undevelopable	18	Mixed 1 and 3	Not connected to edge of settlement.	Undevelopable.
Cro07	No	Yes	Yes	Undevelopable	66	3	Site is not available.	Undevelopable.
Cro08	Yes	Yes	No	Undevelopable	33	3	Not connected to edge of settlement.	Undevelopable.
Cro09	No	Yes	No	Undevelopable	23	3	Site is not available.	Undevelopable.
Cro10	Yes	Yes	No	Undevelopable	36 (note, this application is for 49)	3	Adjacent edge of settlement. Landscape is heavily influenced by the urbanising influences of the adjacent residential development to the north, the A16 to the south and the A1073 to the east, and so development would not be incongruous. Site is around 1.25 km from the centre of Crowland, and on a bus route, and so is not remote.	Developable.
Cro11	Yes	Yes	Yes	Developable	31	1	Reasonably well related to the settlement and offers a realistic prospect for development.	Developable
Cro12	Yes	Yes	No	Undevelopable	34	Mixed 1 and 3	Reasonably well related to the settlement, but adjacent industrial and warehouse uses, which the Council have already concluded would be unsuitable neighbours for residential development.	Undevelopable.
Cro13	Yes	Yes	No	Undevelopable	2	1	Brownfield site, appears suitable for development.	Developable.
Cro14	Yes	Yes	No	Undevelopable	69	3	Site is allocated for employment use and adjacent industrial uses, which the Council have already concluded would be unsuitable neighbours for residential development.	Undevelopable.
Cro15	Yes	Yes	No	Undevelopable	256	3	Not connected to edge of settlement.	Undevelopable.

Cro16	Yes	Yes	No	Undevelopable	35	3	An irregular shaped site which projects into countryside and would not form a logical extension to the settlement.	Undevelopable.
Cro17	Yes	Yes	No	Undevelopable	35	3	Not connected to edge of settlement.	Undevelopable.
Cro18	Yes	Yes	No	Undevelopable	44	1	Reasonably well related to the settlement, but adjacent industrial and warehouse uses, which the Council have concluded would be unsuitable neighbours for residential development.	Undevelopable.
Cro19	Yes	Yes	No	Undevelopable	15	3	Long, thin site which would create ribbon development, which would project into the countryside, creating a proportionately greater impact on the landscape than might be justified by the small number of dwellings provided.	Undevelopable.
Cro20	Yes	Yes	Yes	Developable	5	1	Brownfield site, appears suitable for development.	Developable.
Cro21	Yes	Yes	No	Undevelopable	266	Mixed 1 and 3	Not connected to edge of settlement.	Undevelopable.

4.8 This table demonstrates the following:

- We believe that a greater number of sites are currently developable than the SHLAA suggests.
- Some of the sites within Flood Zone 1 would not be developable, as they are either unavailable or they represent unrealistic or inappropriate locations for residential development; we have therefore concluded that for the purposes of the NPPF technical guidance, these sites are not **'reasonably available'**.
- Some of the developable sites would have significant adverse impacts on the landscape, and would not be ideal locations for residential development. For this reason they may be unlikely to be allocated for development through a future Local Plan.

4.9 The table indicates that the developable sites which are located within Flood Zone 1 would deliver only 75 dwellings. This level of development would fall far short of meting the level of housing needed either to make up the shortfall in the housing land supply, or to meet the need for housing in Crowland in the new Local Plan period.

4.10 The application site is Cro10, which is one of the sites within Flood Zone 3 which we believe to be developable. The developable sites could between them deliver 111 dwellings, according to the SHLAA, and this figure rises to 124 when the higher level of provision from the application site is taken into account.

4.11 It would be necessary for all of the developable sites to come forward for residential development, and other sites beside, if the identified need for housing in Crowland is to be met. Given the immediate need for housing to meet the shortfall in the 5 year housing land supply, and the low level of supply of housing in Crowland, we believe that it would be of great benefit if any of these sites were to provide housing in the short-term. We therefore believe that the application site, as one of only a few developable sites in the town, is required to meet immediate housing need, and so its development is necessary; we therefore believe it passes the sequential test.

5 Conclusions

5.1 This report has considered proposals for residential development on land west of Peterborough Road, Crowland, in the context of the NPPF's flood risk sequential test. The sequential test seeks to direct development towards areas with the lowest risk of flooding, but it allows for development to take place within Flood Zones 2 and 3 where it is necessary, provided that there are not other reasonably available sites at a lower risk of flooding, which could meet the identified need for development.

5.2 We have established that there is a substantial need for housing in the District and within Crowland. There is currently a significant shortfall in the 5 year housing land supply, of nearly 2,000 dwellings across the District, and the NPPF places great importance on making up this deficit as soon as possible. In addition, the Council's emerging Local Plan indicates it will be necessary to provide at least an additional 300 dwellings in Crowland to meet current and future housing needs, and this figure appears set to rise to 450 or more. The emerging Local Plan seeks to meet this need from sites in the SHLAA, and it also concludes that residential development should not generally be restricted to sites within Flood Zone 1, as this would imply that it would not be possible to meet housing need.

5.3 The current supply of housing in Crowland amounts to only 34 dwellings. There is also a substantial need for affordable housing in the District. We conclude that there is no doubt that residential development is necessary in Crowland, and the 49 dwellings which are proposed by this application, of which 16 would be affordable housing, would make a significant and valuable contribution to meeting housing need in the area.

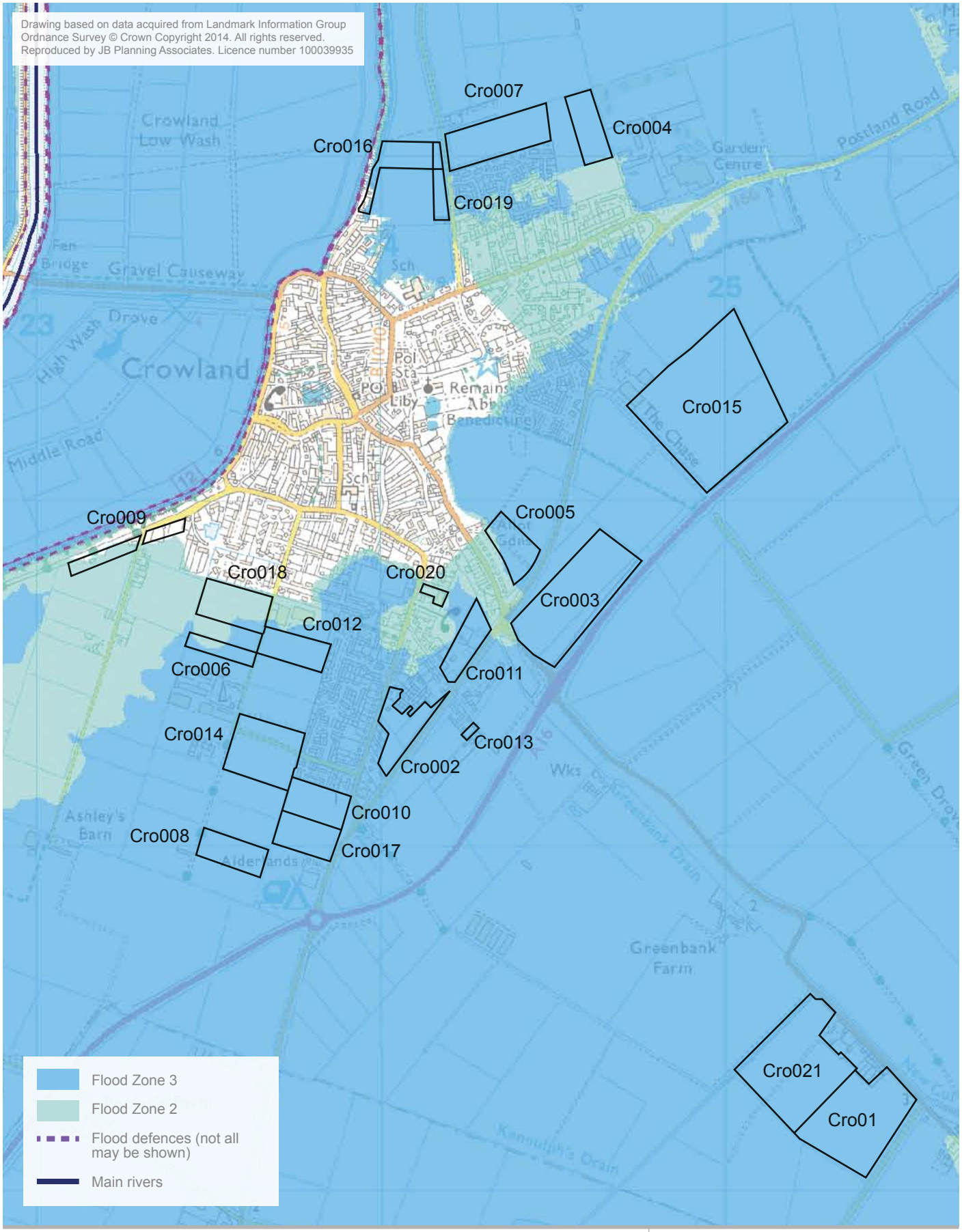
5.4 We have agreed with the Council that the sequential test should be applied only to the Crowland area, and that the SHLAA represents the most reliable and comprehensive source of potentially available development sites. Of the sites identified within the SHLAA, many are not realistic prospects for development, being either unavailable or poorly located, not adjacent to the existing urban area or in positions which would cause significant adverse landscape impacts and extend the settlement in undesirable ways. We believe that there are only a small number of reasonably available and developable sites within Crowland. All of

these sites, and more beside, would be required to meet the level of housing required by the emerging Local Plan.

5.5 Given the immediate need for housing to meet the shortfall in the 5 year housing land supply, and the low level of supply of housing in Crowland, we believe that it would be of great benefit if any of these sites were to provide housing in the short-term. Seeking to restrict development only to sites within Zone 1 would fail to meet either the current or future need for housing.

5.6 We believe that the application site, as one of only a few developable sites in the town, is required to meet immediate housing need, and so its development is necessary. We therefore believe it passes the sequential test.

Drawings



Sequential Test, Crowland

CROWLAND SHLAA SITES IN RELATION TO THE ENVIRONMENT AGENCY'S FLOOD MAP

1299/01

Client: Ashley King Developments
Scale: NTS
20/05/14

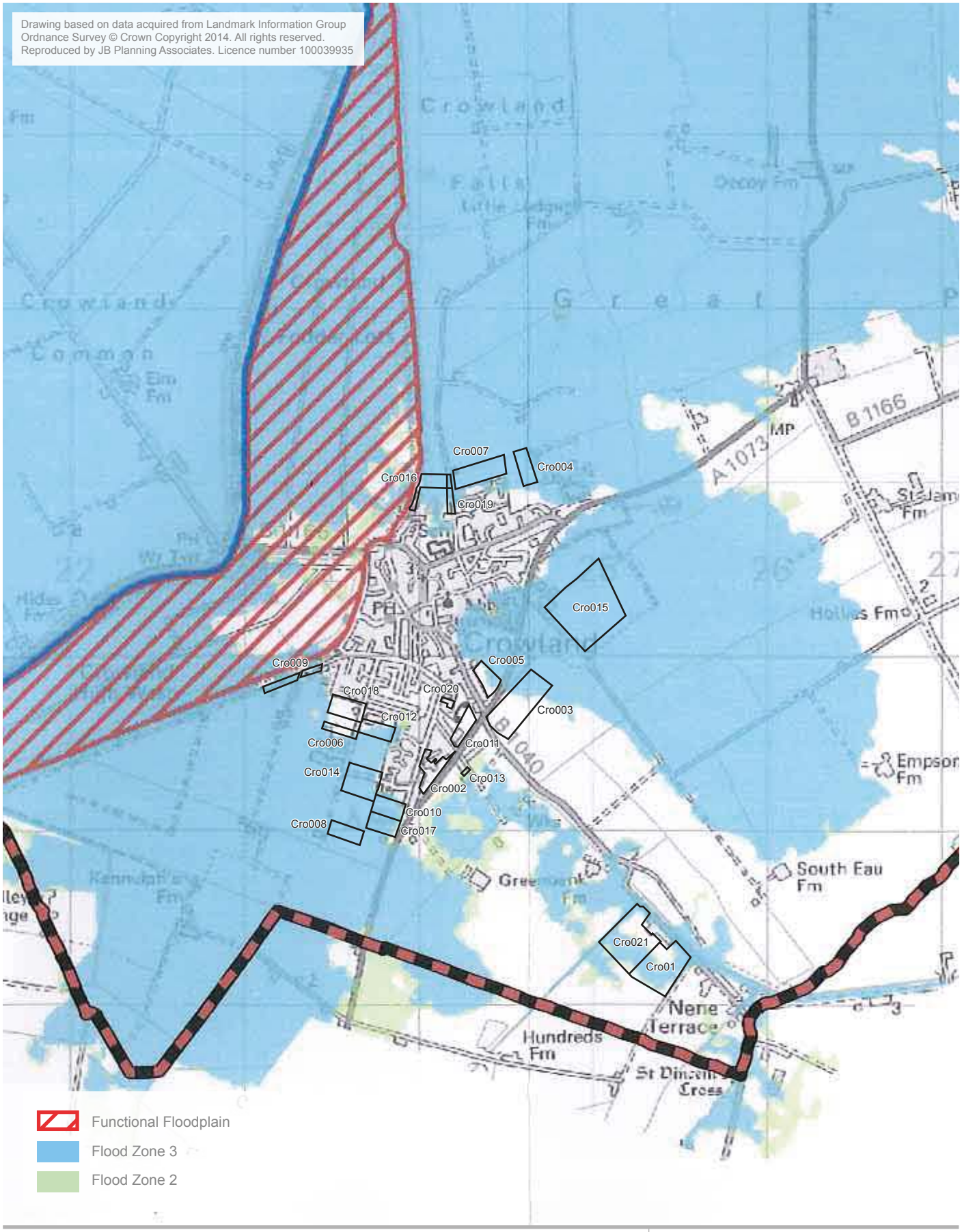
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Sequential Test, Crowland

CROWLAND SHLAA SITES IN RELATION TO THE STRATEGIC FLOOD RISK ASSESSMENT (2010)

N

1299/02

Client: Ashley King Developments
Scale: NTS
20/05/14

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