

SEQUENTIAL TEST ASSESSMENT

 **Flours Mills, East Hill, Ashford, Kent**

Prepared by Hume Planning Consultancy Ltd.

On Behalf of Oliver Davis Homes

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1. Introduction

- 1.1 This Sequential Test has been prepared on behalf of Oliver Davis Homes to support a full planning application for redevelopment comprising the conversion of the existing Flour Mill, the demolition of existing structures, and the erection of four ancillary blocks to provide a total of no. 52 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'super lounge'), 1 x office (Use Class E(g)), retained access from East Hill, parking, and associated landscaping and infrastructure.
- 1.2 In its existing configuration the Site is vacant and comprises of the Flour Mill building and a series of unsympathetic built extensions and large areas of surfaced car parking. Part of the site comprises an undeveloped area of land across the Great Stour, location within the policy-defined town centre of Ashford. The site measures approximately 0.56 hectares in area.
- 1.3 Ashford Borough Council does not have a published methodology in conducting sequential testing relating to flood risk. In preparing this Sequential Test, due regard has been had to the relevant guidance set out in the PPG and the National Planning Policy Framework. A methodology in undertaking this Sequential Test was agreed with Ashford Borough Council (**Section 2 of this report**).
- 1.4 This Sequential Test concludes there are no comparable sites available at a lower risk of flooding within the geographical search area, with due regard to the agreed methodology utilised in this assessment.
- 1.5 On this basis the Sequential Test is passed.

2. Sequential Test Methodology

- 2.1 The subject site comprises the existing Flour Mill located on East Hill, Ashford. Currently vacant, the site constitutes previously developed land (**Figure 1**). A full description is provided in the accompanying Planning Statement and Design and Access Statement.
- 2.2 The site comprises a total area of 0.56ha.

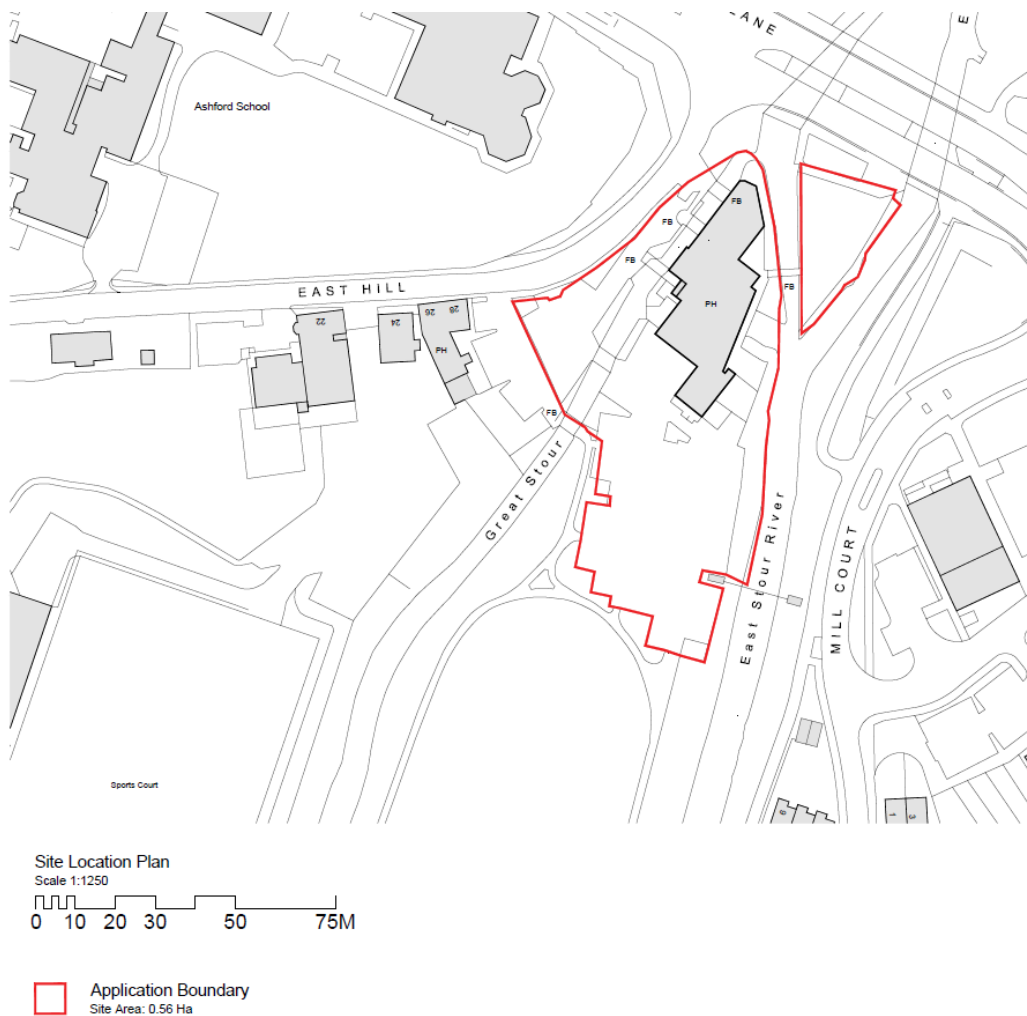


Figure 1. The Site Area, edged red. Totalling 0.56ha in size.

IS THE SEQUENTIAL TEST APPLICABLE?

- 2.3 The site is, in near totality, included within EA designated Flood Zone 3. Part of the site fronting East Hill is included within Environment Agency Flood Zone 2, as defined by National Planning Policy Guidance (NPPG). A Flood Risk Assessment has been prepared to support the application and to inform this Sequential Test. In accordance with National Planning Policy Framework (NPPF, 2021), a Sequential Test is required to support applications for new development within areas considered to be at risk of flooding.
- 2.4 In line with the prevailing guidance under the above circumstances, it should be established whether there are any alternative or reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding instead of the proposed development site in an attempt “to *steer new development to areas with the lowest risk of flooding from any source*” (paragraph 162; NPPF).
- 2.5 Should reasonably available sites of lower flood risk exist that re consistent with wider sustainable development objectives, the Framework sets out that development should not be permitted within the area of higher flood risk.

GEOGRAPHICAL SEARCH AREA

- 2.6 The application site is located within the defined Town Centre boundary of Ashford. The geographical search area of Ashford Town Centre is therefore an appropriate basis for the geographical search area.
- 2.7 The the geographical search area for this Sequential Test is Ashford Town Centre, as defined in **Appendix 1**, an extract of the adopted Planning Policies map for the Borough.

IDENTIFICATION OF COMPARATOR SITES

Size of Comparator Sites

- 2.8 To enable appropriate comparison of sites, it has been agreed with the LPA that comparator sites should have a capacity to accommodate a similar number of units ($\pm 10\%$ units & $\pm 10\%$ site area) when compared to the application site.
- 2.9 In this case, the proposal would deliver mixed use development of 53 dwellings (with ancillary 123.00sqm of supporting office space) across a site area of 0.56ha.
- Comparator sites will have an area of between 0.50ha and 0.62ha
 - Comparator sites will have the capacity to accommodate between 48 and 58 dwellings
- 2.10 Although the proposed development would include for some ancillary office space (Use Class E(g)(i)) the principal land use would be residential (Use Class C3), with the 123sqm of office space serving as a management suite for Oliver Davis Homes who would operate and manage the site from a dedicated suite within the buildings. Given both the nature of the proposal and

the very limited provision of ancillary office space, this Sequential Test examines comparisons for residential use only.

Sources of Information

2.11 Potential comparator sites have been identified using the following available information as agreed with the LPA in preparing this Sequential Test:

- Ashford Borough Local Plan (2030)
- Brownfield Register
- Authority Monitoring Report 2019/2020 (AMR)
- Five Year Housing Land Supply Update (July 2021)
- Strategic Housing and Employment Land Availability Assessment (SHELAA) (2017)

Deliverability & Availability of Comparator Sites

2.12 Comparator sites should be able to accommodate a similar development use as the application site and should be reasonably acceptable in planning terms for the proposed use. Therefore, in addition to considering size and scope of comparator sites, the availability and deliverability of each site should also be considered.

2.13 The relevant criteria which apply are set out in the adopted guidance and summarised below:

- sites where the proposed use would be contrary to the Ashford Borough Local Plan can be discounted as a comparator site providing reasons are clearly given by the applicant as to why a site has been discounted;
- sites put forward and assessed as part of the SHELAA process are considered available for comparison (with due regard to 'Appendix 5 - – Housing Sites remaining for Land Supply');
- sites identified from the latest AMR and brownfield register that have planning permission should also be considered for comparison if permission has expired or work has not yet started on site;
- conversely, where an extant permission has been implemented (i.e., it can be demonstrated that work has started on site), a site can be discounted from the comparison process.

Reasons for Elimination

2.14 Based on the above scope, it is proposed that sites which fall within one or more of the categories below will be discounted from the flood risk comparison where the following conditions apply:

- The site is outside of the search area;
- The site area/capacity is too small or too large;
- Residential development would conflict with development plan policies;

- The site is unavailable for development;
- The site is considered unsuitable or not taken forward in SHELAA assessment;
- If an extant permission has been implemented, work has commenced or been completed on site; and/or
- There is an extant permission for replacement or conversion to dwellings, which is not comparable in nature with the proposal when taken as a whole.

3. Sequential Test – Comparator Sites

First Sift – Comparator Sites from all sources

3.1 From an in-depth review of the sources of information no sites of similar size and scope within the search area were found within:

- the Brownfield Register
- Adopted Local Plan
- the AMR 19/20, or
- the Five-Year Housing Land Supply Update

3.2 The First Sift identified 11 x sites having been filtered by the LPA at Part 1 SHELAA assessment (derived from Appendix 2 of the SHELAA 2017) which meet one of the criteria of being either +/- 10% of site area or dwelling yield. These sites are identified in **Table 1** of this report. All sites identified in the First Sift have been eliminated for the reasons highlighted in Table 1.

Table 1. Site identified through review of Part 1 SHELAA assessment (derived from Appendix 2 of the SHELAA 2017).

	Application Site	Site Area (ha)	Estimated Capacity	Eliminated Site? Why?
	Flour Mill, East Hill, Ashford Kent	0.56ha	53 dwellings	
Site Ref.	Comparator Sites	Site Area (ha)	Estimated Capacity (units)	Eliminated Site? Why?
VC13	Musgrove allotment site	1.712	59	Yes – outside of Search Area
VC22	Domestic Station Forecourt	1.43	59	Yes - site larger in size than range
VC25	Beaver Road Bowls Club	0.7	50	Yes – yield higher than range; site considered unsuitable by LPA in SHELAA.
VC28	Ashford Bowling Alley	0.6	60	Yes – yield higher than range; Site benefitting from allocation under Local Plan Policy S1 – Commercial Quarter; development for residential use would be contrary to Development Plan policy.
VC29	Kent House, Tannery Lane	0.53	60	Yes – yield higher than range; Site benefitting from allocation under Local Plan Policy S1 – Commercial Quarter; development for residential use would be contrary to Development Plan policy.
VC34	The Phoenix PH, Former Ashford Magistrates Court (now Training	0.66	40	Yes – site larger in size than range; yield lower than range.

	centre) and Ashford Police Station			
AG8	Allotment Land rear of 11-30 Osborne Rd	0.521	16	Yes – outside of Search Area; yield lower than range.
GO11	Land East of Sweetbay Crescent	1.308	51	Yes – outside of Search Area; site larger in size than range.
ST4	Associate House, Queens Road (Policy U12)	0.553	21	Yes – outside of Search Area; yield lower than range. Site already allocated.
SW4	Housing at Bath Road/Canterbury Road	1.67	57	Yes – outside of Search Area; site larger in size than range.
SW9	Land rear of 16 - 36 Curtis Road	0.5	17	Yes – outside of Search Area; yield lower than range.

3.3 No comparable sites were identified at Part 2 SHELAA or Part 3 SHELAA Filters (Appendices 3 and 4 of the SHELAA 2017).

3.4 No comparator sites were therefore identified for further assessment from the First Sift from all sources.

Second Sift: 'Housing Sites Remaining for Land Supply'

3.5 A Second Sift examined the SHELAA 2017 'Appendix 5 – Housing Sites remaining for Land Supply'. From this sift of available information, an additional 4 x sites of comparable size and/or dwelling yield (+/- 10%) were identified within the designated Town Centre (**Table 2**).

Table 2: List of identified Comparator Sites, derived from SHELAA (2017 – Appendix 5 – Housing Sites remaining for Land Supply)

	Application Site	Site Area (ha)	Estimated Capacity	Eliminated Site? Why?
	Flour Mill, East Hill, Ashford Kent	0.56ha	53 dwellings	
Site Ref.	Comparator Sites	Site Area (ha)	Estimated Capacity (units)	Eliminated Site? Why?
VC5	Vicarage Lane Car Park	0.577 ha	50 dwellings	Yes - allocated for residential development under Policy TC5 of the Adopted Local Plan.
VC19	New Street South and Lidl and Gym	0.909 ha	50 dwellings	Yes - already allocated for residential development under policy TC19 of the Adopted Local

				Plan; site area also in excess of the 0.50ha-0.62ha.
VC20	New Street North	0.506 ha	25 dwellings	Yes - already allocated for residential development under Policy TC20 of the Adopted Local Plan; yield significantly lower than proposed development range. Site also falls outside of Search Area.
GO4	Former Godinton Way Industrial Estate	2.75 ha	52 dwellings	Yes - already allocated for residential development under Policy TC8 of the Adopted Local Plan.

- 3.5 The sites identified in **Table 2** are broadly comparable with the parameters established as part of this methodology, falling within a +/- 10% range on either site area and/or dwelling yield.
- 3.6 Before advancing the sequential test, it is necessary to consider these sites against the exclusion criteria of this methodology.
- 3.7 Table 2 concludes that none of these sites accords with the agreed methodology; each is excluded by way of already benefitting from allocation in the adopted Local Plan. In several cases, the sites fail to accord with the agreed methodology in that they are too large or yield too few dwellings to be comparable.
- 3.8 From both the First Sift and Second Sift, no comparator sites have been identified for further sequential assessment.

4. Sequential Test Assessment

COMPARISON LEVEL 1

Are there any comparator sites located outside Flood Zones 2 and 3 on the Environment Agency's latest interactive Flood Mapping system?

- 4.1 As above, there are no comparator sites available within the Search Area based on the identified sources of information.

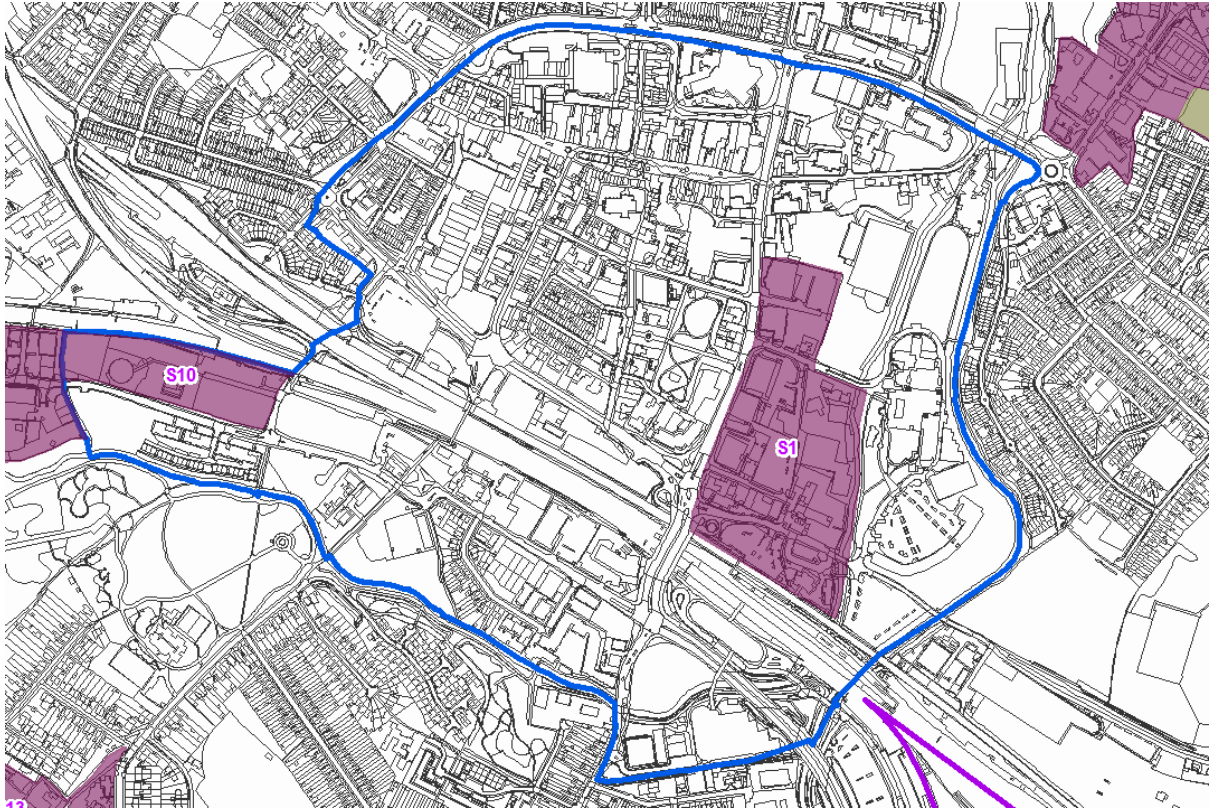
COMPARISON LEVEL 2

Are there any comparator sites at lower risk than the application site based on the EA's online flood mapping?

- 4.2 The sites identified at **Tables 1 and 2** have already been eliminated from the Sequential Test in line with the exclusion criteria agreed with the LPA and set out in the methodology.
- 4.3 In this regard, there are no comparable sites available at a lower risk of flooding within the geographical search area.
- 4.4 **On this basis the Sequential Test is passed.**

Appendices

Appendix 1 – Geographical Search Area



Extract of Local Plan Interactive Policies Map identifying the designated Ashford Town Centre edged blue.