

AMBIENTAL

ENVIRONMENTAL ASSESSMENT

Sequential Test 6134

Land Adjacent to 2 Silverdale Street,
Haverigg,
Copeland,
LA18 4EU

Document Issue Record

Project: Sequential Test

Prepared for: Tim Jones

Reference: 6134 ST

Site Location: Land adjacent to 2 Silverdale Street, Haverigg, Copeland, LA18 4EU

Proposed Development: It is understood that the development is for the construction of two residential dwellings, on a brownfield site, which has previously been used for caravan, trailer storage and van parking.

Consultant		Date	Signature
Author	Sophie Isaacs	08/03/2021	
Document Check	Lydia Sayers	09/03/2021	
Authorisation	Steven Brown	12/03/2021	

Please Note:

This report has been prepared for the exclusive use of the commissioning party and may not be reproduced without prior written permission from Ambiental Environmental Assessment. All work has been carried out within the terms of the brief using all reasonable skill, care and diligence. No liability is accepted by AMBIENTAL for the accuracy of data or opinions provided by others in the preparation of this report, or for any use of this report other than for the purpose for which it was produced.

Contact Us:

Ambiental Environmental Assessment
Sussex Innovation Centre,
Science Park Square,
Brighton, BN1 9SB

www.ambiental.co.uk

0203 857 8540

Contents

Contents	3
1. Introduction	4
2. Proposed Development and Site Location	6
3. Flood Risk	8
4. Definition of Study Area	10
5. Identification of Sites within the Study Area	11
6. Assessment of Comparator Sites	13
7. Conclusion	15

1. Introduction

Background

- 1.1 This report presents the findings of the Sequential Test that has been undertaken for Tim Jones for the proposed development at Land adjacent to 2 Silverdale Street, Haverigg, Copeland, LA18 4EU.
- 1.2 The proposed development is for the construction of two semi-detached 3no. bedroom houses. The site is currently a hardstanding area, previously used for caravan, trailer storage and van parking.
- 1.3 With reference to the Environment Agency (EA) Flood Map for Planning, the proposed development is located within Flood Zone 3. The proposed development is considered “More Vulnerable” under Table 2 of the Flood Risk and Coastal Change Planning Policy Guidance and the NPPF.
- 1.4 Ambiental have produced a site-specific Flood Risk Assessment (Ambiental Ref 5927 FRA).
- 1.5 The proposed development is required to pass a Sequential Test, in line with guidelines provided in the Flood Risk and Coastal Change Planning Practice Guidance.
- 1.6 A sequential test is used to establish whether there are any other sites at a lower flood risk that would be available for the proposed development.
- 1.7 Wherever possible, development must be directed to a site in the lowest flood risk zone. If development is planned in a higher risk zone, flood management and mitigation measures may be required to reduce risks to an acceptable level, for the specific use in question.
- 1.8 As such, Ambiental have been appointed to undertake a Sequential Test for the proposed development site.

Scope of report

- 1.9 The National Planning Policy Framework (NPPF) requires that any proposed development situated within a flood zone is subject to stringent and prudent regulations – with a view to employing engineering solutions to reduce flood risk to a minimum, even under a ‘worst-case scenario’ flood event.
- 1.10 This Sequential Test has been undertaken in accordance with the current flooding guidance found in the NPPF and the Sequential Test Results Table presented within the EA Standing Advice Development and Flood Risk – England, published in April 2015.
- 1.11 Further, this document has also been prepared in line with the Planning Practice Guide, Flood Risk and coastal change¹ (March 2014), with specific reference to Paragraph: 033 Reference ID: 7-033-20140306, which provides guidance for ‘applying the Sequential Test to individual planning applications.’ The guidance states:

The Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor

¹ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Sequential-Test-to-Local-Plan>

development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site).

Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change).

For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases it may be identified from other Local Plan policies, such as the need for affordable housing within a town centre, or a specific area identified for regeneration. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives.

When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere. For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary.

Any development proposal should take into account the likelihood of flooding from other sources, as well as from rivers and the sea. The sequential approach to locating development in areas at lower flood risk should be applied to all sources of flooding, including development in an area which has critical drainage problems, as notified to the local planning authority by the Environment Agency, and where the proposed location of the development would increase flood risk elsewhere.

See also advice on who is responsible for deciding whether an application passes the Sequential Test and further advice on the Sequential Test process available from the Environment Agency (flood risk standing advice).

- 1.12 This Sequential Test has been undertaken in accordance with the current flooding guidance found in the National Planning Policy Framework (NPPF) and Flood Risk and Coastal Change Planning Practice Guidance (PPG). This is the most up-to-date and relevant guidance available for undertaking a Sequential Test.

2. Proposed Development and Site Location

- 2.1 The proposed development is located at Land adjacent to 2 Silverdale Street, Haverigg, Copeland, LA18 4EU (Figures 1 and 2).
- 2.2 The proposed development is for the construction of two semi-detached three-bedroom houses. The site is currently a hardstanding area, previously used for caravan, trailer storage and van parking.
- 2.3 The EA Flood Map for Planning demonstrates that the proposed development lies within Tidal Flood Zone 3 with a high probability of greater than 1 in 200 (0.5%) of flooding from seas or tidal estuaries in any year.

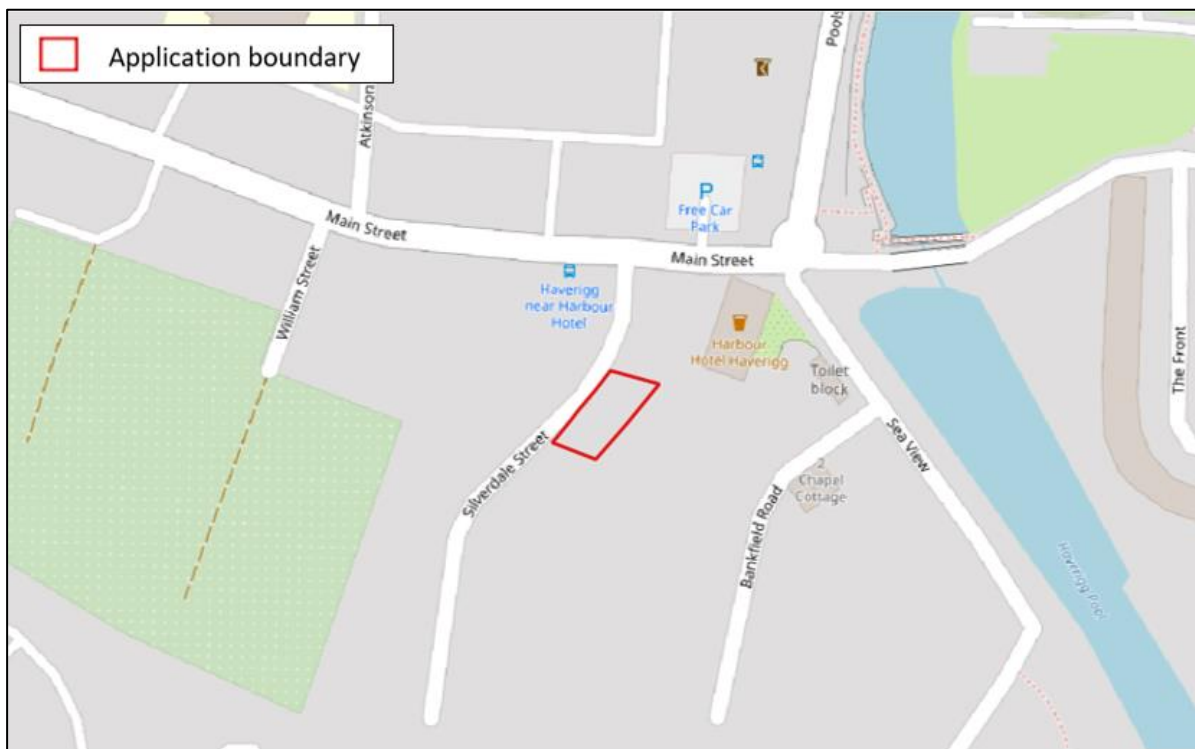


Figure 1 Location Map, identifying the location of the proposed development (Source: OpenStreet Map)



Figure 2 Aerial Imagery, showing location of site (Source: GoogleMaps)

3. Flood Risk

- 3.1 Ambiental have produced a Flood Risk Assessment for this proposed development (Ambiental Ref 5927 FRA). This Sequential Test should be reviewed in conjunction with the FRA. A summary of key points has been included below.
- 3.2 The EA Flood Map for Planning (Figure 3) demonstrates that the proposed development lies within Flood Zone 3 and does not benefit from flood defences.
- 3.3 The nearest watercourse to the site is the EA Main River, Haverigg Pool, which is approximately 60m east of the site boundary. This watercourse discharges into Duddon Channel, which then flows into the Irish Sea.
- 3.4 The main source of flooding to the site is considered to be tidal.
- 3.5 The Environment Agency provided site-specific modelled flood levels and flood outlines for the tidal events for both the defended and undefended scenarios, extracted from the Tidal ABD Study (2014), and for fluvial flood events, taken from the Haverigg Study (2011). As per comments provided by the Environment Agency, Ambiental have only considered the undefended scenarios. An analysis of the flood data within the FRA report has demonstrated the following:
- The site could be affected by a flood level of 6.17mAOD in the modelled 1:200-year tidal flood event (undefended), resulting in flood depths of between 0.46m and 0.75m when compared with existing ground levels of the site.
 - During the modelled 1:1,000-year tidal flood event (undefended), a flood level of 6.43mAOD could affect the site. This could result in flood depths of between 0.72m and 1.01m on site.
 - Using the December 2019 updated climate change allowances for sea level rise, the 1:200-year +CC (Higher Central) undefended flood level for the site is 7.12mAOD; and 7.5mAOD in the 1:200-year +CC (Upper End) defended scenario. Based on existing ground levels of the site, this land could experience potential maximum flood depths of 1.7m in the 1:200-year +CC (Higher Central) scenario and 2.08m in the 1:200-year +CC (Upper End) defended scenario.
 - The site should remain unaffected by fluvial flooding in the 1:25-year, 1:100-year, 1:1,000-year and 1:100-year +20%CC flood events, for both the defended and undefended scenarios.
- 3.6 As such, this demonstrates that the risk of flooding from tidal sources to the proposed dwellings and the site is high.
- 3.7 The proposed development will provide 2 two-storey residential dwellings, with lower consequence uses provided at the ground floor level (kitchen, dining room and living room) and sleeping accommodation provided at the first-floor level. It is recommended that the first-floor Finished Floor Levels are raised to 8.10mAOD, which is 600mm above the 1:200-year +CC flood level using the Upper End scenario.

- 3.8 It is important to note that the proposed dwelling will be two storeys and thus emergency safe refuge could be sought at the first floor, if required. Furthermore, given the nature of tidal flooding, it is likely that sufficient early warning would be provided before flood waters reach the site.
- 3.9 Flood mitigation measures will be incorporated into the construction of the proposed dwellings, as detailed within the FRA.
- 3.10 Given that the proposed development is for the construction of “More Vulnerable” development in Flood Zone 3a, it is required to pass both the Exception Test and Sequential Test.

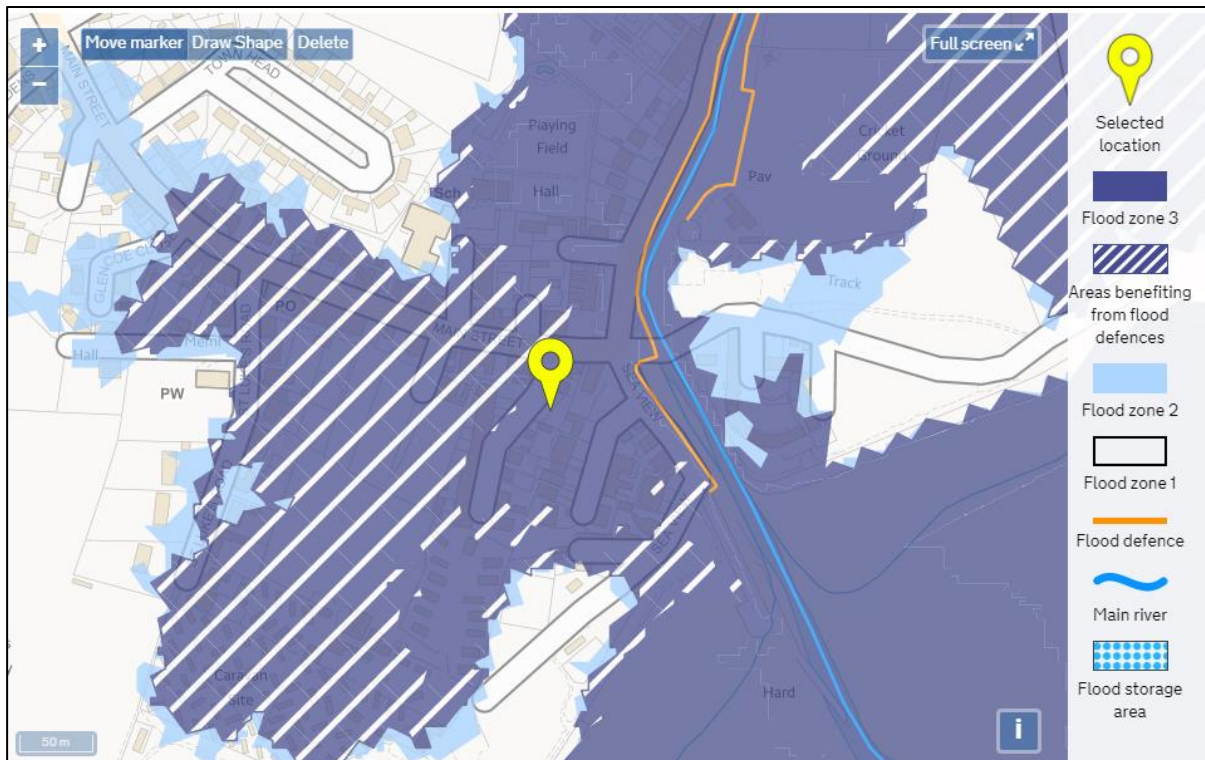


Figure 3 EA Flood Map for Planning, showing location of site (Source: EA)

4. Definition of Study Area

- 4.1 The DEFRA and EA Flood Risk Assessment: the sequential test for applicants states that developers should contact the local planning authority to discuss what the search area should be for alternative sites for the development.
- 4.2 Copeland Borough District Council have confirmed that given the scale of this development the settlement of Haverigg should be used with regards to the area of search for the Sequential Test. A map of the Haverigg settlement is provided in Figure 4, using Map 32 from the Copeland Borough Council SHLAA (2020) document which shows the deliverable and developable sites within the settlement.

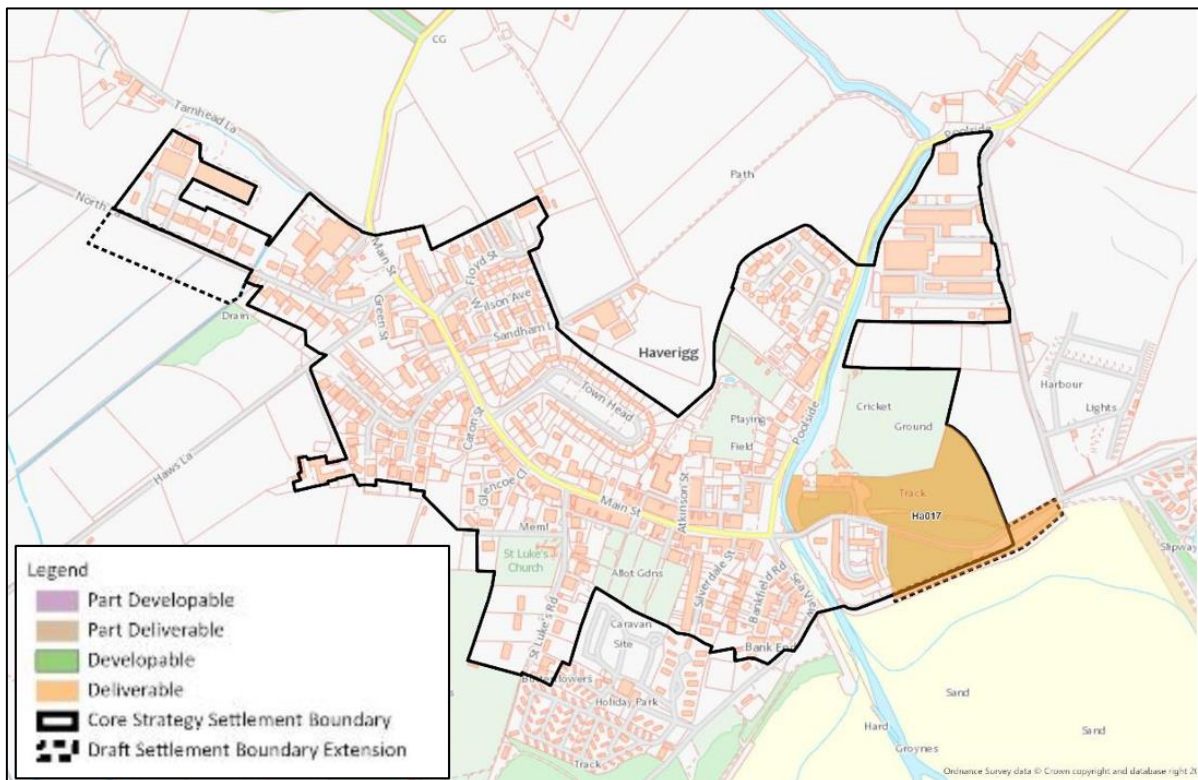


Figure 4: Map of Haverigg Settlement, showing deliverable/developable sites in the settlement, taken from Copeland Borough District SHLAA, 2020

5. Identification of Sites within the Study Area

- 5.1 Ambiental have reviewed two main documents to identify comparator sites based on guidance provided by the LPA:
- The Copeland Borough District Council's Strategic Housing Land Availability Assessment (SHLAA), which was completed in September 2020 to inform the emerging Copeland Local Plan (2017 to 2035);
 - The Copeland Borough District Council's 5-Year Housing Land Supply Statement 2020/21, which was published in November 2020.
- 5.2 The SHLAA identifies sites and locations with potential for future development, and then assesses their development potential, based on suitability, availability and achievability. It is thus used to identify specific sites that could help meet housing requirements. This is the most up-to-date information available to identify alternative sites.
- 5.3 The 5-Year Housing Land Supply Statement is a document which informs planning decisions for housing development. It identifies the housing need over the 5-year period following the base date of the document (1st April 2020 to 31st March 2025) and provides a list of deliverable housing sites to meet this need. Thus, Ambiental have reviewed the list of deliverable housing sites, to identify any comparator sites for this Sequential Test.
- 5.4 The development proposed is for 2 semi-detached houses on an existing brownfield site. This is a net increase of 2 residential dwellings. The plot of land is approximately 0.03-hectare (275m²) and is located in Flood Zone 3.
- 5.5 Copeland Borough District Council have confirmed that given the scale of this development the settlement of Haverigg should be used with regards to the area of search for the Sequential Test. Furthermore, the District Council has stated that comparator sites should be suitable for achieving 2no. residential dwellings.
- 5.6 Ambiental have used this information to create 2 conditions for assessing alternative sites within this Sequential Test. A suitable alternative site would need to meet all of the below criteria.
- **Condition 1 – Site Location**
 - The proposed site is located in Haverigg. Copeland Borough Council have indicated that given the size of the proposed site (0.03ha, 2 residential dwellings), only sites within the Haverigg Settlement should be assessed.
 - **Condition 2 – Size and Yield**
 - The proposed site is 0.03ha in size and the proposal is to provide 2 semi-detached residential dwellings. Copeland Borough Council have said that sites with a similar size and yield to the proposed site should be assessed within this Sequential Test.
 - This condition will be examined only once Condition 1 has been met.

- 5.7 Sites were analysed in numerical order; therefore, sites would need to meet Condition 1 to then be reviewed for Condition 2. Failure at any condition deemed the site to fail that test.
- 5.8 If no data was available to assess a site under one of the conditions, it automatically passed that condition. If a site was deemed to pass all conditions, it was then shortlisted for further review within this report.
- 5.9 Upon completing this analysis, a total of 7 sites were deemed to fit the criteria set out above.
- 5.10 The next stage is to assess the availability, suitability and achievability of these comparator sites. The methodology of this and details on the findings of the assessment are provided in the next section.

6. Assessment of Comparator Sites

- 6.1 Upon reviewing the sites listed with the Copeland Borough Council's SHLAA and 5-Year Housing Land Supply Statement 2020/21 documents, a total of 7 sites are found to be located in Haverigg, thus passing Condition 1 of this Sequential Test. These 7 sites have been assessed further in this section, to assess whether they pass Condition 2 of the Sequential Test.
- 6.2 If any of the comparator sites pass both Conditions 1 and 2, it must also be deemed as suitable, available and achievable. This information is provided within the SHLAA and Housing Supply Statement.
- 6.3 The 7 comparator sites which passed Condition 1 are assessed in further detail below and summarised in Table 1.

Copeland Borough Council's SHLAA

- 6.4 Upon reviewing the sites provided in Copeland Borough Council's SHLAA document, it was found that there is only 1 site identified in Haverigg as developable and deliverable. The SHLAA reference number for this site is Ha017, and the site name is Poolside. However, the yield of this site is 81, which is too large when compared with the proposed yield of 2 residential dwellings. Thus, this site fails Condition 2 and is not deemed suitable as an alternative site for the proposed development.

Copeland Borough Council's 5-Year Housing Land Supply Statement

- 6.5 The 5-year Housing Land Supply Statement provides information of land with a potential for development in the future. There is a total of 6 sites located in Haverigg. Ambiental have assessed each of these sites using the information provided in the 5-year Housing Land Supply Statement. This document was published in November 2020 for the year 2020 to 2021, using a base date of April 2020.
- 6.6 The information provided in this document for the 6 sites located in Haverigg does not include any information on the yield, capacity or size of the sites. Given the lack of information, all 6 sites have automatically passed Condition 2.
- 6.7 Ambiental then assessed the availability of each of these sites. The Borough Council's 5-Year Housing Land Supply Statement demonstrates that all 6 sites have existing planning applications in place. Development on 5 out of 6 of the sites is shown to be under construction and development on the remaining site is shown to not yet have commenced. Based on this information, it is considered that none of the 6 sites identified in Haverigg in the 5-year Housing Land Supply Statement are available as an alternative site for the proposed development.

Conclusion of Assessment

- 6.8 Overall, this assessment of the Copeland Borough Council's SHLAA and 5-Year Housing Land Supply Statement 2020/21 documents demonstrates that there are **no available and suitable sites** which could be used for the proposed development.

Name / ID or Address of Comparator Sites	Yield	Passes or Fails Condition 2?	Availability of site	Source
Poolside (SHLAA ID: Ha017)	81	Fails		SHLAA
126 Main Street, Haverigg	No information	Pass	There is an existing planning application for this site and the development is currently under construction. Thus, this site is not available.	5-year Housing Land Supply Statement
The Rising Sun, 38 Main Street, Haverigg	No information	Pass	There is an existing planning application for this site and the development is currently under construction. Thus, this site is not available.	5-year Housing Land Supply Statement
Town Head Farm, 75 Main Street, Haverigg	No information	Pass	There is an existing planning application for this site and the development is currently under construction. Thus, this site is not available.	5-year Housing Land Supply Statement
Land Adjacent to 3 Sandham Lane, Haverigg	No information	Pass	There is an existing planning application for this site and the development is currently under construction. Thus, this site is not available.	5-year Housing Land Supply Statement
Poolside Barn, Haverigg Road, Haverigg	No information	Pass	There is an existing planning application for this site and the development is currently under construction. Thus, this site is not available.	5-year Housing Land Supply Statement
Moss Side, Waingate Bridge, Haverigg	No information	Pass	There is an existing planning application for this site. The decision date was 8 th April 2019 and the development has not yet commenced, according to the 5-year Housing Land Supply Statement. Based on this information, and given that the site has planning application, it is not available.	5-year Housing Land Supply Statement

Table 1: Summary of Assessment of the Shortlisted Sites

7. Conclusion

- 7.1 This report presents the findings of the Sequential Test that has been undertaken for Tim Jones for the proposed development at Land adjacent to 2 Silverdale Street, Haverigg, Copeland, LA18 4EU.
- 7.2 The proposed development is for the construction of two semi-detached 3no. bedroom houses. The site is currently a hardstanding area, previously used for caravan, trailer storage and van parking.
- 7.3 With reference to the Environment Agency (EA) Flood Map for Planning, the proposed development is located within Flood Zone 3. The proposed development is considered “More Vulnerable” under Table 2 of the Flood Risk and Coastal Change Planning Policy Guidance and the NPPF.
- 7.4 Ambiental have produced a site-specific Flood Risk Assessment (Ambiental Ref 5927 FRA).
- 7.5 The proposed development is required to pass a Sequential Test, in line with guidelines provided in the Flood Risk and Coastal Change Planning Practice Guidance.
- 7.6 Ambiental have reviewed two main documents to identify comparator sites:
- The Copeland Borough District Council’s Strategic Housing Land Availability Assessment (SHLAA), which was completed in September 2020 to inform the emerging Copeland Local Plan (2017 to 2035);
 - The Copeland Borough District Council’s 5-Year Housing Land Supply Statement 2020/21, which was published in November 2020.
- 7.7 The development proposed is for 2 semi-detached houses on an existing brownfield site. This is a net increase of 2 residential dwellings. The plot of land is approximately 0.03-hectare (275m²) and is located in Flood Zone 3.
- 7.8 Copeland Borough District Council have confirmed that given the scale of this development the settlement of Haverigg should be used with regards to the area of search for the Sequential Test. Furthermore, the District Council has stated that comparator sites should be suitable for achieving 2no. residential dwellings.
- 7.9 Ambiental have used this information to create 2 conditions for assessing alternative sites within this Sequential Test. A suitable alternative site would need to meet all of the below criteria.
- **Condition 1 – Site Location**
 - The proposed site is located in Haverigg. Copeland Borough Council have indicated that, given the size of the proposed site (0.03ha, 2 residential dwellings), only sites within the Haverigg Settlement should be assessed.
 - **Condition 2 – Size and Yield**
 - The proposed site is 0.03ha in size and the proposal is to provide 2 semi-detached residential dwellings. Copeland Borough Council have said that sites with a similar size and yield to the proposed site should be assessed within this Sequential Test.

- This condition will be examined only once Condition 1 has been met.
- 7.10 Upon reviewing the sites listed with the Copeland Borough Council's SHLAA and 5-Year Housing Land Supply Statement 2020/21 documents, a total of 7 sites were found to be located in Haverigg, thus passing Condition 1 of this Sequential Test.
- 7.11 A further assessment of these 7 sites was completed in Section 6 of the Sequential Test, with the following findings:
 - The site identified in the SHLAA document failed Condition 2, due to having a yield of 81 (compared to the proposed development of 2 dwellings);
 - The other 6 sites were identified in the Housing Land Supply Statement and no information was provided on the site with regards to their size, yield or capacity. All 6 of these sites had existing planning application according to this document, and developments were either under construction or had not yet commenced. Given that these sites already have planning applications in place, none of them are deemed to be available as an alternative site for the proposed development.
- 7.12 As such, the analysis within this Sequential Tests indicates that there are not any reasonably available and suitable alternative sites within an area of lower flood risk that could support the client's proposed development. As a result, the proposed development is deemed to pass the Sequential Test and should be subject to the Exception Test.
- 7.13 The proposed development will provide 2 two-storey residential dwellings, with lower consequence uses provided at the ground floor level (kitchen, dining room and living room) and sleeping accommodation provided at the first-floor level. It is recommended that the first-floor Finished Floor Levels are raised to 8.10mAOD, which is 600mm above the 1:200-year +CC flood level using the Upper End scenario.
- 7.14 Emergency safe refuge could be sought at the first floor of the proposed dwellings, if required. Furthermore, given the nature of tidal flooding, it is likely that sufficient early warning would be provided before flood waters reach the site.
- 7.15 Flood mitigation measures will be incorporated into the construction of the proposed dwellings, as detailed within the FRA.
- 7.16 This Sequential Test has been undertaken in accordance with the current flooding guidance found in the National Planning Policy Framework (NPPF) and Flood Risk and Coastal Change Planning Practice Guidance (PPG). Through this analysis, it is considered that the proposed development passes the Sequential Test.

The findings and recommendations of this report are for the use of the client who commissioned the assessment, and no responsibility or liability can be accepted for the use of the report or its findings by any other person or for any other purpose.