

Sequential Test for proposed commercial extension at 127-143 Kingsway, Mortlake, London SW14 7HN.

1.1. Proposed Development

The proposed commercial extension site is at 127-143 Kingsway, Mortlake, London, SW14 7HN. The existing site has 38 garages including a vehicle repair garage. The site footprint is approximately 0.14ha. The proposed development is to demolish 38 garages including vehicle repair garage and the erection of six residential units, incorporating two commercial (B1a offices) units (totalling 152m²), with amenity space, off-street car parking and associated works

1.2. Flood Risk

The site lies within Flood Zone 2 as described in Table 1 of the Technical Guidance to the National Planning Policy Framework, land assessed as having between a 1 in 100 annual probability of river flooding (1% - 0.1%) or a 1 in 200 annual probability of sea flooding (0.5% - 0.1%) in any year. In addition, the site benefits from flood defences. The proposed development is categorised as a 'more vulnerable' development in accordance with Table 3 of the Technical Guidance to the National Planning Policy Framework.

1.3. Sequential Test

The Sequential and Exception Tests should be applied when choosing the location of new development and the layout of the development site. The Sequential Test aims to promote development in areas with low flood risk. The Exception Test is used where no suitable development areas can be found in low risk areas, the risk of flooding is clearly outweighed by other sustainability factors, and the development will be safe for its lifetime, taking climate change into account.

According to the 2012 Environment Agency Demonstrating the flood risk Sequential Test for Planning Applications, the Sequential Test can be considered adequately demonstrated if both of the following criteria are met:

- The Sequential Test has already been carried out for the site (for the same development type) at the strategic level (Local Plan); and
- The development vulnerability is appropriate to the Flood Zone (see table 3 of technical guidance to the National Planning Policy Framework).

The Sequential Test has not been carried out for the site at the strategic level.

The development is described as 'more vulnerable' according to table 3 of the technical guidance to the National Planning Policy Framework.

The 2008 London Borough of Richmond upon Thames Local Housing Availability Assessment (LHAA) was used to identify potential alternative sites for the proposed development. The 2008 (LHAA) effectively identifies a pool of potentially developable sites for housing development. The 2008 LHAA does not make policy or assess the comparative sustainability or desirability of land.

1.3.1. Available Sites

The proposed development refers to the construction of seven no. three bed residential units, incorporating two commercial units. By definition alternative sites capable of accommodating more than 10 units (houses) are not deemed suitable for this particular development; as this would not assist towards sustainable development and it is not cost-effective for both the developer and the Borough.

The following are the small potentially developable sites identified in the London Borough of Richmond upon Thames and in relatively close distance to the site.

Table 1 - Alternative sites for the proposed development

RAB Ref.	Site	Proposal site	Phase	Approx No Units	Progress as at Feb 2008
1	183-185 Lower Richmond Road	No	2007-12	13	Planning permission granted
2	76 lower Mortlake Road	No	2007-12	10	Planning permission granted
3	179-181 Sheen Road	No	2007-12	11	Planning permission granted
4	Central service Station	No	2007-12	10	Planning permission granted
5	The Avenue Centre	No	2007-12	6	Planning permission granted as part of mixed use development
6	70 High Street	No	2007-12	11	Planning permission granted
7	Friars Lane car park	Yes Ref:R4	2007-12	5-20	Site brief published
8	Terrace Yard	Yes Ref:R17	2007-12	5-10	

1.3.2. Sequential Test Outcome

According to the Environment Agency flood maps, the sites with RAB reference number 1, 5, 6, and 7 are located at an area which is in Flood Zone 2 and/or 3. This suggests that moving the development to these locations would not reduce the flood risk. The site with RAB Reference number=8 is of unknown status in terms of planning permission, despite the fact that it is located in Flood Zone 1. In addition, the remainder alternative sites of the 2008 (LHAA) are also located in Flood Zone 1. Given the fact that planning permission was granted to these locations in early 2008, it is surely abstruse and equivocal the assumption of the potential availability of these sites. As a result, it has not been possible to determine any available sites in areas of lower flood risk to the proposed development site. In addition, the site is not at risk of flooding during a breach scenario and during a scenario where all linear defences have been removed; this suggests that the site will remain dry even during an extreme event, which is highly unlikely to occur (all defences inundated). In conclusion, there are no sequentially preferable sites available in lower flood risk areas for the proposed development.