

Flood Risk Sequential Test.

Full Planning Application Ref. 22/1225/FUL

Car Park at St Margarets Business Centre, Godstone Road,
St Margarets, TW1 1JS

On behalf of Godstone Developments Limited

Date: March 2023 | Pegasus Ref: P20-0141



Document Management.

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1. Introduction.

1.1. This Report has been prepared by Pegasus Group on behalf of Godstone Developments Limited ('the Applicant') in support of a full planning application (Ref. 22/1225/FUL) for the redevelopment of the car park at St Margarets Business Centre, for the following proposed development:

"Erection of 3no. residential dwellings (Class C3) with associated parking, access and landscaping."

1.2. The site comprises wholly Flood Zone 2 land according to the Government's 'Flood Map for Planning' service (<https://flood-map-for-planning.service.gov.uk/>). This is due to the site's proximity to the River Crane, approximately 0.3km to the east. According to the Environment Agency's Flood Maps, the River Crane benefits from flood defences.

1.3. An extract of the Government's Flood Maps is included within Figure 1 below with the site shown in red outline.

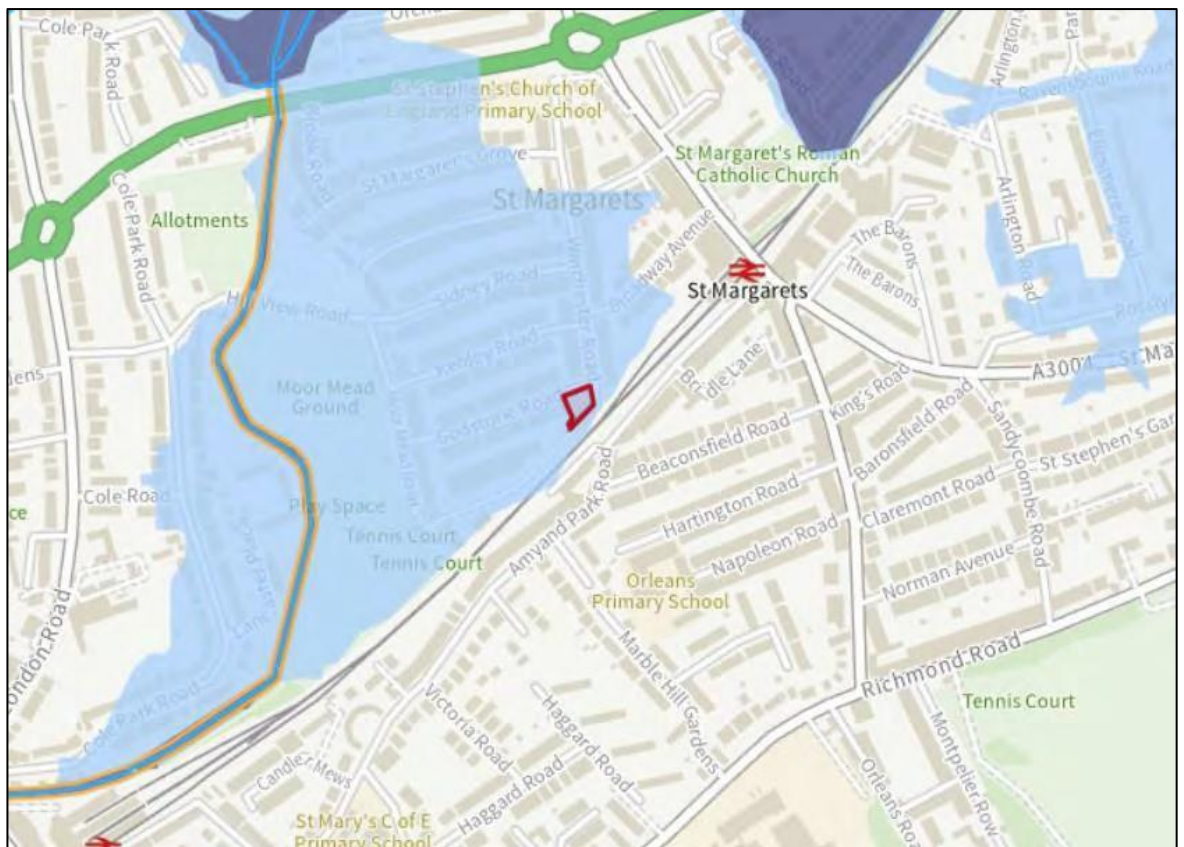


Figure 1 – Extract of Government's Flood Map



14. The site is within close proximity to the 400m buffer zone (approximately 150m beyond) as set out within Policy LP21 and will fall wholly within the 800m buffer as set out within Draft Policy 8 of the emerging Local Plan which does not require a Sequential Test to be provided. Additionally, the London Borough of Richmond upon Thames Strategic Flood Risk Assessment (SFRA) (published 2021) sets out that the 400m buffer defined by adopted Policy LP21 has been superseded by the 800m buffer set out within emerging policy.
15. It is considered that should full weight be applied to the emerging Local Plan, there would be not need to undertake a sequential test for this site. Indeed, the site would fall within the 800m for both Twickenham Town Centre and St Margarets Local Centre buffers.
16. However, as agreed with Council Officers, a Sequential Test has been provided in respect of the proposed development.
17. In summary, the risk of site flooding from all sources is generally considered to be low and any residual risk will be further managed as set out within the Flood Risk Assessment & Drainage Strategy Report, prepared by Simpson TWS (ref. P20-435A Issue No 1 dated 11th March 2022) which was submitted with the application.



2. Site and Surroundings.

Location

- 2.1. The site is situated within the administrative boundary of the London Borough of Richmond upon Thames ('LBR'). The site is located at the corner of Drummonds Place and Winchester Road and is bound by Godstone Road to the north. The site is approximately 0.2km south west of St Margarets Rail Station and 0.2km east of Moormead and Bandy Recreational Ground.
- 2.2. The site comprises land formerly used as a "overspill" car park associated with the St Margarets Business Centre, which adjoins the site to the south-west. The car park is surplus to the requirements and forms separate ownership from the St Margarets Business Centre, which comprises 7 no. industrial units served by adequate parking within forecourts directly to the front of the units. Forming separate ownership, the business centre no longer has use of the car park.
- 2.3. The site is largely square and measures approximately 0.06 hectares in size. A photograph of the site is included at Figure 1 below. The site is bound to the north by Godstone Road and Winchester Road to the east, which are characterised by 2-storey terraces and semi-detached residential properties.
- 2.4. The site is located approximately 250m to the west of St Margarets Railway Station and the adjoining shops and services.



Figure 2 – Application site from Winchester Road



3. The Proposed Development.

3.1. This application seeks planning permission for 3 no. residential dwellings (Use Class C3) and associated parking, access and landscaping. Specifically, the proposals seek permission for:

“Erection of 3no. residential dwellings (Class C3) with associated parking, access and landscaping.”

3.2. In accordance with Annexe 3 (Flood Risk Vulnerability Classification) of the National Planning Policy Framework (NPPF) (2021), residential dwellings are categorised as a *“more vulnerable”* use.

3.3. Please refer to Section 4 of the Planning Statement, prepared by Pegasus Group, for further details.

4. Policy Framework.

4.1. The Development Plan for the London Borough of Richmond upon Thames comprises:

- Local Plan (adopted July 2018 and March 2020 in relation to two legal challenges);
and
- The London Plan (adopted March 2021).

4.2. London Borough of Richmond are also in the process of preparing a new Local Plan which will be used to guide the location, amount, and type of development the Borough needs to accommodate. The Council carried out a Call for Sites exercise between March and April 2020, followed by informal engagement through community workshops in Summer/Autumn 2021. The Council consulted on the Pre-Publication Draft Local Plan (Regulation 18) between December 2021 and January 2022. The next stage of consultation on the Publication Draft (Regulation 19) is expected to start in May 2023.

4.3. The latest timetable issued by the Council sets out that Submission and Examination scheduled between late Summer 2023 to Summer 2024 and Adoption in Winter 2024/25.

4.4. Policies relevant to this Sequential Test are detailed below.

Local Plan (adopted 2018)

4.5. **Policy LP21** (Flood Risk and Sustainable Drainage) states that development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. The table within Policy LP21 states that for development within Zone 2, a Flood Risk Assessment and Sequential Assessment are required.

4.6. The supporting text for Policy LP21 states that future development in Zone 2 and 3a will only be considered if the 'Sequential Test' has been applied in accordance with national policy guidance, subject to some exceptions. The Sequential Test will not be required if it not major development (defined as development where the number of dwellings to be provided is 10 or more, or the site area is 0.5 hectares or more) and at least one of the following applies:



- It is a Local Plan proposal site that has already been sequentially tested, unless the use of the site being proposed is not in accordance with the allocations in the Local Plan.
- It is within a main centre boundary as identified within this Local Plan (Richmond, Twickenham, Teddington, Whitton and East Sheen).
- It is for residential development or a mixed use scheme and within the 400 metre buffer area identified within the Plan or surrounding the centres referred to above.
- Redevelopment of an existing single residential property.
- Conversions and change of use.

4.7. The site is not allocated, is located outside of the 400m buffer and includes 3no. residential units, therefore these exemptions are not applicable.

London Borough of Richmond upon Thames Strategic Flood Risk Assessment (SFRA) (published 2021)

4.8. The London Borough of Richmond upon Thames Strategic Flood Risk Assessment (SFRA) provides a strategic overview of the flood risk throughout the Borough. The SFRA takes into consideration both present and future flood risk. It has been undertaken to address local requirements, manage development requirements, and manage the risk of flooding for residents and buildings.

4.9. The SFRA sets out that the buffer of 400m defined by adopted Policy LP21 has now been superseded by a 800m buffer to Town and Centre buffers. The site falls within the buffer zone for both Twickenham Town Centre and St Margarets Local Centre. However, through discussions with Council Officer's, it has been confirmed that the SFRA does not override the current adopted planning policy position. Therefore the Council apply the requirements of Policy LP21 in respect of the need for a Sequential Test.

4.10. The SFRA sets out that the default search area when undertaking a Sequential Test should be the entire borough.

Pre-Publication Draft Local Plan (Regulation 18) (December 2021)

4.11. **Draft Policy 8 (Flood Risk and Sustainable Drainage (Strategic Policy))** sets out that development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. Part E



sets out that for sites within Flood Zone 2, a Sequential Test is required “for all developments unless exceptions outlined in the supporting text to this policy apply.

4.12. The supporting text sets out that the Sequential Test will not be required if the development proposal meets at least one of the following:

- It is within a town centre or local centre boundary;
- It is for residential development or a mixed-use scheme and within the 800m buffer area identified within the town centre or local centre.

4.13. Once the emerging Local Plan is adopted, the site would fall within the 800m buffer zone for both St Margarets Local Centre and Twickenham Town Centre.

Material Considerations

4.14. The following documents are also material considerations in the determination of Planning Applications:

- National Planning Policy Framework (July 2021);
- National Planning Practice Guidance (as amended);

National Planning Policy Framework (NPPF) (July 2021)

4.15. **Paragraph 159** – *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*

4.16. **Paragraph 161** – *“All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:*

- a) applying the sequential test and then, if necessary, the exception test as set out below;*
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*



- c) *using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
- d) *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.”*

4.17. **Paragraph 162** – *“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.”*

4.18. **Paragraph 163** – *“If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the Exception Test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.”*

4.19. **Paragraph 167** – *“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

- a) *within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) *the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) *it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*



- d) *any residual risk can be safely managed; and*
- e) *safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”*

4.20. The National Planning Practice Guidance¹ states:

“The Sequential Test ensures that a sequential approach, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- *Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.*

4.21. Both national and local planning policy has been considered in the context of this Sequential Test.

¹ Paragraph: O24 Reference ID: 7-024-20220825



5. Sequential Test.

- 5.1. The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones are identified within the Government's 'Flood Risk Map for Planning', which provide the basis for applying the test.
- 5.2. As identified within the National Planning Practice Guidance (NPPG), the aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, LPAs in their decision making should consider the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding).

The Sequential Test and The Proposed Development

- 5.3. As identified, Flood Zone 2 land has a medium probability of flooding – i.e. it has an annual probability of river flooding between 1.0% and 0.1% and annual probability of sea flooding between 0.5% and 0.1%. For the application to pass the Sequential Test, there should be no reasonably available sites appropriate for the proposed development in Flood Zones 1.
- 5.4. As outlined within the NPPG, the first stage in carrying out the sequential test is to define a search area. Paragraph 27, Reference ID: 7-027-20220825 of the NPPG states:
- 5.5. *"For individual planning applications... 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."*
- 5.6. As agreed with Planning Officers, the search area has been applied to the entirety of the London Borough of Richmond upon Thames.



Identifying Alternative Sites

- 5.7. The Sequential Test requires the identification of any alternative sites within the search area that are at lower risk of flooding and may be more appropriate.
- 5.8. Alternative sites have been assessed based on those allocated within the adopted Richmond Local Plan and the Draft Richmond Local Plan. Sites that are of similar size, as well as those 25% smaller and larger, have been considered as part of the Sequential Test. The application of a +/- 25% is deemed appropriate as allows flexibility of alternative sites to accommodate the proposed development. The +/-25% allows for the identification and consideration of any comparable sites. Sites above this are considered to result in the identification of sites which are too small to accommodate the proposed development, or too large which would result in an efficient and ineffective use of land.
- 5.9. The London Strategic Housing Land Availability Assessment (SHLAA) (2017) was also assessed however it is considered that the sites brought forward by the Council in the adopted Local Plan and emerging Local Plan supersede these sites on the basis that they have been discounted at local level.
- 5.10. A search of land available on Rightmove, On The Market, Zoopla, and Estates Gazette has also been undertaken for available land for sale on the open market within the entire Borough.

Determining If Alternative Sites Are 'Reasonably Available'

- 5.11. As identified above, the application will fail the Sequential Test if alternative sites within the search area are at a lower risk of flooding and could appropriately accommodate the proposed development. A site is only considered to be reasonably available if it is both 'deliverable' and 'developable' as defined within the NPPF.
- 5.12. To assess the suitability of alternative sites and whether they are reasonably available, the following criteria is to be applied sequentially, based on criteria guidance issued from various local authorities:
- A. Is the alternative site located within the search area?
 - B. Can the alternative site provide a similar number of dwellings? In this case a +/- 25% of 3no. dwellings or 0.06ha has been assessed (0.045ha to 0.075ha).



- C. Can the eternity or parts of the alternative site accommodate the dwellings within in Flood Zone 1 land?
- D. Is the alternative site at risk of other sources of flooding and do these compromise future development in terms of units that can be delivered?
- E. Is the alternative site 'reasonably available' as defined within the NPPF?

5.13. Where an alternative site fails to meet all the criteria, it will be deemed as unsuitable and as such, a less sequentially preferable site to accommodate the proposed development.

Review of Alternative Sites

5.14. There are 28 sites allocated within the adopted Local Plan and 12 additional sites proposed for allocation within the Draft Local Plan. The 40 identified sites have been assessed initially against site size (capacity for 2 to 4 dwellings or 0.051ha to 0.069 ha), flood risk, and allocation / draft allocation type. Subsequently, any sites which pass the initial assessment, will be considered against the following criteria:

- **Flood Risk Type:** Summary of the type of flood risk associated with the site including the potential source, i.e. fluvial/tidal, pluvial, groundwater, sewer surcharging, and artificial sources.
- **Current Occupancy:** Confirmation of the current site use(s) and ownership (if known).
- **Constraints:** Any other notable constraints.

5.15. For the searches undertaken on Rightmove, On The Market, Zoopla, and Estates Gazette, the number of available sites is set out below (note that in instances where the search could not be undertaken with the bespoke search criteria, a search of 'sites under 0.5ha' was used which was the smallest available search criteria):

- **Rightmove** – 1 site
- **On The Market** – 1 site (Note that this sites is the same as that listed on Rightmove and therefore has not been reproduced within the table)
- **Zoopla** – No sites
- **Estates Gazette** – 3 sites

5.16. For completeness all 5no. sites have been assessed against the above criteria.



5.17. The results of the initial assessment for the Sequential Test are displayed within Table 1 below. As shown within Table 1, there are no sites that pass the initial assessment that can be considered further.

Table 1 – Sequential Test Initial Assessment

	Site Name	Adopted Site Allocation Ref.	Draft Site Allocation Ref.	Allocation Type	Site Area (ha)	Flood Zone	Comments
1	Application Site – Car Park at St Margarets Business Centre	N/A	N/A	-	0.06ha	2	-
Adopted Site Allocations							
2	Hampton Square, Hampton	SA1	Site Allocation 1	Partial redevelopment for improvement for community, retail and local services, employment and residential uses, including affordable units and car parking.	2.85ha	1	Discounted due to size (too large for site requirements).
3	Platts Eyot, Hampton	SA2	Site Allocation 2	Regeneration of the island by maintaining, and where possible enhancing, existing river-dependent and river related uses. New business and industrial uses (B1, B2 and B8) that respect and contribute to the island's special and unique character are encouraged. Residential development to allow for the restoration of the listed buildings, especially those on the Heritage at Risk Register, may be appropriate.	3.77ha	1/ 2 / 3a / 3b	Discounted due to size (too large for site requirements), flood risk, and allocated for business and industrial uses.
4	Hampton Traffic Unit, 60–68	SA3	Site Allocation 3	Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The	0.28ha	1	Discounted due to size (too large for site requirements) and allocated for business and



	Station Road, Hampton			Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.			employment use, with Building of Townscape Merit to be retained.
5	Hampton Delivery Office, Rosehill, Hampton	SA4	Site Allocation 5	If the site is declared surplus to requirements, appropriate land uses include employment generating or social and community infrastructure uses.	0.12ha	1	Discounted due to size (too large for site requirements) and allocated for employment generating of social / community infrastructure uses.
6	Telephone Exchange, Teddington	SA5	Site Allocation 6	If the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, such as B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered.	0.17ha	1	Discounted due to size (too large for site requirements) and allocated for residential uses at upper floors only.
7	Teddington Delivery Office, Teddington	SA6	Site Allocation 7	If the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, including B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered.	0.6ha	1	Discounted due to size (too large for site requirements) and allocated for residential uses at upper floors only.
8	Strathmore Centre,	SA7	Site Allocation 8	Social and community infrastructure uses and/or an affordable housing scheme with on-site car parking are the most appropriate land uses for this site.	0.63ha	1	Discounted due to size (too large for site requirements) and allocated for social /



	Strathmore Road, Teddington						community infrastructure uses and/or affordable housing.
9	St Mary's University, Strawberry Hill	SA8	Site Allocation 10	Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation.	12.08ha		Discounted due to size (too large for site requirements) and allocated for upgrading of university use / student accommodation.
10	Richmond upon Thames College, Twickenham	SA9	Site Allocation 11	Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Protection and upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch.	8.65ha	1 / 2	Discounted due to size (too large for site requirements) and flood risk.
11	The Stoop (Harlequins Rugby Football Club), Twickenham	SA10	Site Allocation 12	The Council supports the continued use of the grounds for sports uses. Appropriate additional facilities including a new north stand, indoor leisure, hotel or business uses, may be supported provided that they are complementary to the main use of the site as a sports ground.	4.61ha	1	Discounted due to size (too large for site requirements) and allocated for sports uses.
12	Twickenham Stadium, Twickenham	SA11	Site Allocation 13	The Council supports the continued use and improvement of the grounds for sports uses. Appropriate additional facilities including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be	12.62ha	2	Discounted due to size (too large for site requirements), flood risk, and allocated for sports uses.



				supported provided that they are complementary to the main use of the site as a sports ground.			
13	Mereway Day Centre, Mereway Road, Twickenham	SA12	Site Allocation 14	Social and community infrastructure uses are the most appropriate land uses for this site.	0.23ha	1 / 2	Discounted due to size (too large for site requirements), flood risk, and allocated for social/community infrastructure uses.
14	Telephone Exchange, Whitton	SA13	Site Allocation 19	If the site is declared surplus to requirements, appropriate land uses include employment and social infrastructure or other appropriate main centre uses. Any proposal should provide for employment floorspace, including B1 offices. A mixed use scheme with housing, including affordable housing, could be considered.	0.42ha	1	Discounted due to size (too large for site requirements).
15	Kneller Hall, Whitton	SA14	Site Allocation 20	It has been announced that Kneller Hall will be released for disposal. Appropriate land uses include residential (including affordable housing), employment (B uses) and employment generating uses as well as social infrastructure uses, such as health and community facilities. Any proposal should provide for some employment floorspace, including B1 offices. The Council will expect the playing fields to be retained, and the provision of high quality public open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.	9.72ha	1	Discounted due to size (too large for site requirements).



16	Ham Close, Ham	SA15	Site Allocation 22	The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.	4.31ha	1	Discounted due to size (too large for site requirements).
17	Cassel Hospital, Ham Common, Ham	SA16	Site Allocation 23	If the site and the Grade II listed Cassel Hospital are declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the listed buildings.	3.97ha	1	Discounted due to size (too large for site requirements).
18	St Michael's Convent, Ham Common, including new Other Open Land of Townscape Importance (OOLTI) designation	SA17	-	The Grade II listed St Michael's Convent and The Cottage have been declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the listed buildings.	1.54ha	1	Discounted due to size (too large for site requirements).
19	Ryde House, East Twickenham	SA18	-	Any redevelopment proposal for this site will be required to prioritise the provision of a new 2-form entry primary school. In conjunction with the educational use, the provision of retail is considered appropriate in this location.	0.34ha	3	Discounted due to size (too large for site requirements), flood risk, and allocated for educational use/retail.



20	Richmond Station, Richmond	SA19	Site Allocation 24	Comprehensive redevelopment to provide an improved transport interchange and an appropriate mix of main centre uses. This includes as a priority the provision of retail floorspace as well as employment floorspace. Appropriate main centre uses, such as other employment generating uses as well as social infrastructure and community uses should also be provided. The provision of housing (including affordable housing) in upper floors as part of a mixed use scheme would be appropriate.	1.96ha	1	Discounted due to size (too large for site requirements) and allocated for residential uses at upper floors only.
21	Friars Lane Car Park, Richmond	SA20	-	The Council supports the redevelopment of the existing under-utilised car park to provide housing, including affordable housing.	0.15ha	3	Discounted due to size (too large for site requirements) and flood risk.
22	Sainsbury's, Lower Richmond Road, Richmond	SA21	Site Allocation 29	The Council will support comprehensive redevelopment of this site to provide for retail and residential uses. The continued use of the site as a foodstore and the reprovision of the existing retail floorspace is required.	2.63ha	1	Discounted due to size (too large for site requirements).
23	Pools on the Park and surroundings, Old Deer Park, Richmond	SA22	Site Allocation 32	The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional leisure facilities, community and other complementary uses will be supported provided they meet identified needs and do not detract from the main use of the site as a publicly accessible swimming facility.	1.96ha	1	Discounted due to size (too large for site requirements) and allocated for sports uses and additional leisure/community uses.
24	Richmond Athletic Association	SA23	Site Allocation 33	The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated	9.93ha	1	Discounted due to size (too large for site



	Ground, Old Deer Park, Richmond			leisure facilities and other complementary uses could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations.			requirements) and allocated for leisure uses.
25	Stag Brewery, Lower Richmond Road, Mortlake	SA24	Site Allocation 34	The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field.	8.77ha	3	Discounted due to size (too large for site requirements) and flood risk.
26	Mortlake and Barnes Delivery Officer, Mortlake	SA25	Site Allocation 35	If the site is declared surplus to requirements, appropriate land uses include employment or other commercial and retail uses.	0.08ha	3	Discounted due to size (too large for site requirements), flood risk, and allocated for employment, commercial, and retail uses.



27	Kew Biothane Plant, Mellis Avenue, Kew	SA26	Site Allocation 31	The Council supports the redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.	0.69	3	Discounted due to size (too large for site requirements) and flood risk.
28	Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	SA27	Site Allocation 36	If the Telephone Exchange is declared surplus to requirements, appropriate land uses for the whole area include employment and commercial uses as well as community and social infrastructure uses. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear could be considered.	0.44ha	1	Discounted due to size (too large for site requirements) and allocated for residential uses at upper floors only.
29	Barnes Hospital, East Sheen	SA28	Site Allocation 37	If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses. Any redevelopment proposal for this site will be required to prioritise the provision of a new Special Education Needs school.	1.44ha	1	Discounted due to size (too large for site requirements) and allocated for social/community infrastructure uses.
Additional Draft Site Allocations							
30	Carpark for Sainsburys, Uxbridge Road, Hampton	-	Site Allocation 5	If the site comes forward for development, an appropriate future land use would be 100% on-site affordable housing. There is a strong planning policy expectation that a future development scheme coming forward should deliver 100% on-site affordable housing. The restoration and enhancement of the Longford River wildlife corridor along the southern edge would be required.	1.99ha	1	Discounted due to size (too large for site requirements) and allocated for 100% affordable housing provision.



31	Teddington Police Station, Park Road, Teddington	-	Site Allocation 9	Community/social infrastructure led mixed use development with an element of residential. The residential element should provide a policy compliant level of affordable housing.	0.16ha	1	Discounted due to size (too large for site requirements).
32	Station Yard, Twickenham	-	Site Allocation 15	The appropriate land use for this site includes residential uses. Any redevelopment proposal will be required to improve the public realm/landscaping. The bus stands should be retained, redeveloped or re-sited in a suitable location.	0.17ha	1	Discounted due to size (too large for site requirements).
33	Twickenham Telephone Exchange	-	Site Allocation 16	If the Telephone Exchange is declared surplus to requirements, the Council supports the mixed use redevelopment of the site to bring forward residential and employment, commercial or retail uses which enhance the community / cultural offering within Twickenham town centre.	0.18ha	1	Discounted due to size (too large for site requirements).
34	Twickenham Police Station	-	Site Allocation 17	In the event of a satisfactory re-location of Police station uses, acceptable uses of the site would be for a mix of town centre uses to include retail or other active frontages on London Road, with residential to rear, facing Grosvenor Road.	0.23ha	1	Discounted due to size (too large for site requirements).
35	Twickenham Riverside and Water Lane/King Street	-	Site Allocation 18	Comprehensive mixed-use redevelopment of the site to provide residential, a range of commercial uses, high quality public realm and improvements to the riverside and open space.	1.06ha	1 / 2 / 3a / 3b	Discounted due to size (too large for site requirements) and flood risk.
36	Whitton Community	-	Site Allocation 21	Commercial / social infrastructure led mixed use development with the re-provision of the pharmacy and affordable housing.	0.14ha	1	Discounted due to size (too large for site requirements).



	Centre, Percy Road, Whitton						
37	Former House of Fraser, 16 Paved Court, 20 King Street, 4 to 8 and 10 Paved Court, and 75-81 George Street, Richmond	-	Site Allocation 25	The Council supports a mix of commercial and community uses, including retail, offices/workspace, and leisure/community use, with active ground floor street frontages including along Paved Court and at Golden Court.	0.19ha	1	Discounted due to size (too large for site requirements) and allocated for commercial/community uses.
38	Richmond Telephone Exchange, Spring Terrace, Richmond	-	Site Allocation 26	If the site is deemed surplus to requirement, the Council would support the provision of housing, including affordable housing.	0.27ha	1	Discounted due to size (too large for site requirements).
39	American University, Queens Road, Richmond	-	Site Allocation 27	If the site is deemed surplus to requirement, then educational uses are the most appropriate land use for the site. If educational use is not viable on site, then the provision of community/social infrastructure uses would also be appropriate or could be incorporated as part of a mixed-use scheme.	2.01ha	1	Discounted due to size (too large for site requirements) and priority for the allocation is the provision of educational uses.
40	Homebase, Manor Road, East Sheen	-	Site Allocation 28	Comprehensive residential-led redevelopment of the site with a flexible range of other uses, including retail, office and community/social. This will include the provision of high quality public realm, improvements to permeability and the Manor Road street frontage, to integrate the development into the surrounding area.	1.84ha	1	Discounted due to size (too large for site requirements).



41	Kew Retail Park, Bessant Drive, Kew	-	Site Allocation 30	Mixed use	3.91ha	3	Discounted due to size (too large for site requirements) and flood risk.
Rightmove (and On the Market)							
42	Land to the rear of Castelnau, Barnes	-	-	-	0.17ha	3	Discounted due to size (too large for site requirements) and flood risk.
Estates Gazette							
43	Land to the rear of 185 Waldegrave Road	-	-	Interest sought for office, light industrial or other employment generating uses. Historic lapsed planning consent for the erection of 2no. Class B1 units (ref. O4/O1465/FUL).	0.02ha	1	Discounted due to size (too small for site requirements) and proposed use.
44	Plough Lane, Teddington	-	-	Existing vacant industrial unit.	0.02ha	1	Discounted due to size (too small for site requirements) and comprises existing building.
45	Land at Gould Road, Twickenham	-	-	Existing warehouses, cold storage, commercial / office buildings.	1.09ha	1	Discounted due to size (too large for site requirements) and comprises existing commercial buildings.



Assessment of the Application Site

- 5.18. The housing target in the adopted Local Plan is set out within Policy LP34 which states that the Borough's target is 3,150 new dwellings between 2015–2025. The target for the St Margarets area is to provide between 1,000 and 1,050 new dwellings within this period, along with Twickenham Riverside, North Twickenham, South Twickenham, and West Twickenham. Notably, the London Plan significantly increases this target to 4,110 dwellings between 2019/20–2028/29 which is reflected within Draft Policy 10 of the emerging Local Plan.
- 5.19. Furthermore, Policy H2 (Small Sites) of the London Plan (2021) sets out that boroughs should proactively support well-designed new homes on small sites (under 0.25 hectares) in order to significantly increase the contribution of small sites to London's housing targets. Table 4.2 sets out a 10 year target for net housing completions on small sites as 2,340 (annual requirement of 234 dwellings). The target set out in these Policies are minimum targets (which have been reflected within Draft Policy 16 of the emerging Local Plan) and therefore boroughs should seek to exceed these targets.
- 5.20. As per the table above, the application site and the development proposal, to which this sequential test report relates, should be considered acceptable as the proposal of 3 dwellings will contribute towards the overall housing required as part of Policy LP34 of the Local Plan and there are no other sequentially preferable sites that could accommodate the proposed development, without being an inefficient use of land.



6. Exception Test

- 6.1. In accordance with Paragraph 163 of the NPPF, *“If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3”.*
- 6.2. As set out within this Report, the site is classified as ‘more vulnerable’ due to comprising residential development. As per Table 2 of the NPPG Flood Risk and Coastal Change section², for sites that are ‘more vulnerable’ and within Flood Zone 2, the Exception Test is not required.
- 6.3. Therefore, it is not necessary to undertake the Exceptions Test in respect of the site and proposed development.

² 079 Reference ID: 7-079-20220825



7. Conclusions.

- 7.1. This Flood Sequential Test has been written and carried out with reference to local planning policy, the NPPF and the NPPG with respect to the proposed development for 3 dwellings located at Car Park at St Margarets Business Centre, Godstone Road, St Margarets, TW1 1JS.
- 7.2. This report demonstrates there are no alternative nor sequentially preferable sites at a lower flood risk at the appropriate scale that can accommodate the proposed development. As such, the application passes the Sequential Test.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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