

Sequential and Exception Test

To support the redevelopment of
Assheton Court in Portchester (PO16 9PT)

January 2022

DRAFT

1.0 INTRODUCTION

- 1.01 Fareham Housing are proposing the complete redevelopment of the Assheton Court sheltered housing site in Portchester. The objective is to provide a modern, fit for purpose, sheltered housing facility to meet some of the unmet need for affordable older person accommodation in the Portchester area.
- 1.02 The Assheton Court site, like much of the lower Portchester area, is in a high-risk flood zone due to its coastal position. This risk is further exacerbated by climate change and potential sea level rise.
- 1.03 This Sequential and Exception Test follows the Flood Risk Assessment and Drainage Strategy produced by Bright Plan Civils on behalf of Fareham Housing (Fareham Borough Council). It is intended to fulfil the requirements as identified in national guidance.

| Flood Zones | Flood Risk Vulnerability Classification | | | | |
|-------------|---|-------------------------|-------------------------|-----------------|------------------|
| | Essential infrastructure | Highly vulnerable | More vulnerable | Less vulnerable | Water compatible |
| Zone 1 | ✓ | ✓ | ✓ | ✓ | ✓ |
| Zone 2 | ✓ | Exception Test required | ✓ | ✓ | ✓ |
| Zone 3a † | Exception Test required † | ✗ | Exception Test required | ✓ | ✓ |
| Zone 3b * | Exception Test required * | ✗ | ✗ | ✗ | ✓* |

(Extract from Flood Risk and Coastal Change Guidance – Table 3 (gov.uk))

- 1.04 The Assheton Court site is in Floodzone 3a and the redevelopment proposed is classified as 'more vulnerable'. A Sequential and Exception Test are therefore required.

2.0 SEQUENTIAL TEST

Site Address

2.01 Assheton Court, Castle Street, Portchester, Fareham, PO16 9PT

Site Location

2.02 The site is located to the immediate south of Portchester District Centre; the centre includes various shops and services. Bus routes are located nearby, and Portchester train station is less than 500m from the site.

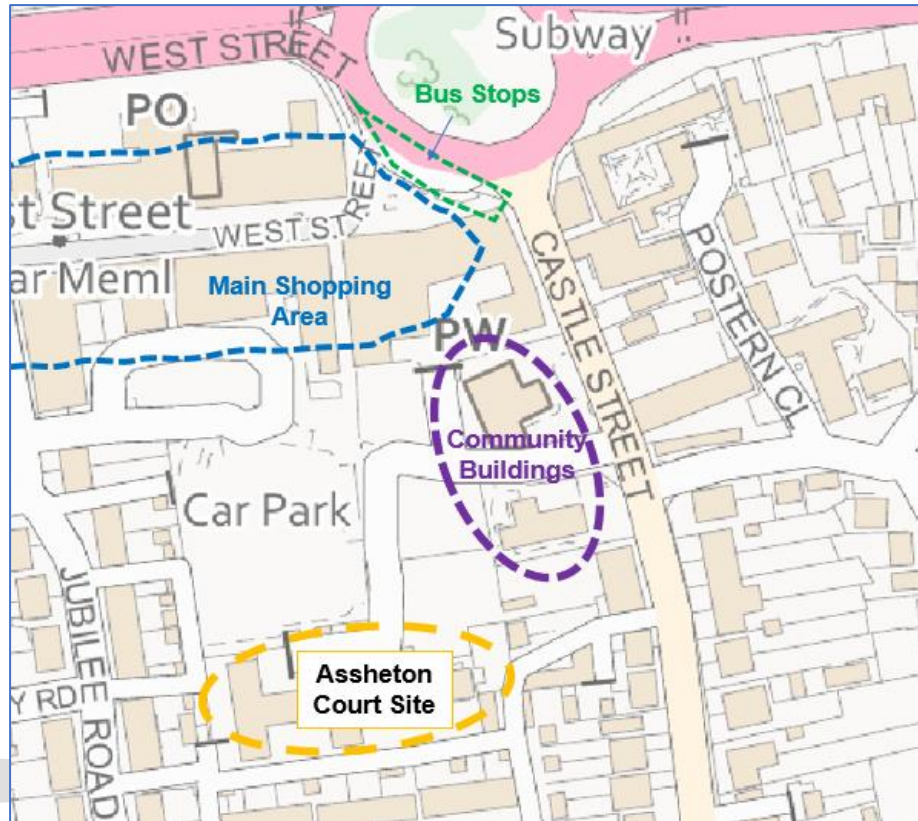


Figure 1 (site in context of surroundings)

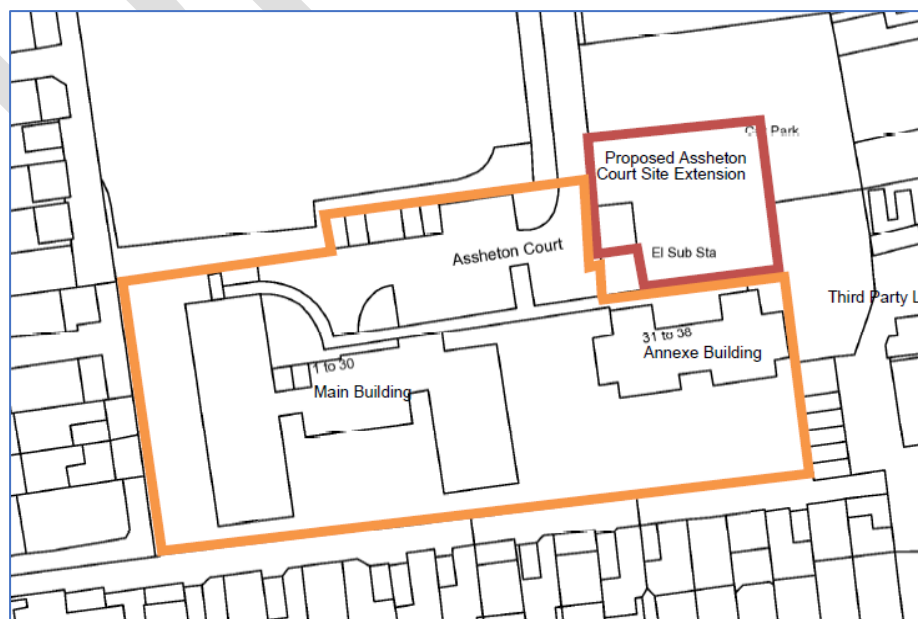


Figure 2 (Site, including site extension)

Background on Current Accommodation

- 2.03 The existing building at Assheton Court was built in 1971. It provides affordable housing (sheltered housing) for older persons. There are currently 33 self-contained flats and residents typically live independently with only a small number having some visiting care support to their home. During office hours the building is supported by a Council employed Sheltered Housing Officer.
- 2.04 The age and condition of the existing building does not meet modern expectations for older person accommodation. It contains some less favourable bedsit accommodation, some first-floor accommodation only accessible by stairs, a small lift (not serving all upper floor accommodation), and many narrow corridors. In addition to this there are older disused elements of the building such as communal bathrooms.
- 2.05 A significant amount of money would need to be spent on the refurbishment and maintenance of the building over the next 30 years. Even if these works were undertaken it would still fail to overcome some of the flaws of the building associated with its age and original design.

Background on Sheltered Housing Need

- 2.06 The Portchester area has a high need for affordable older person accommodation. The Council's Housing Register (as at autumn 2021) includes 44 older persons waiting for accommodation in the Portchester area. By 2037 this level of need is expected to grow by a further 16% due to the ageing profile of the Borough's population. The current sheltered need has been relatively static for some time in Portchester. This indicates that additional/new sheltered flats are required as the typical churn (i.e., the frequency of flats becoming re-available for letting) is not fulfilling the need. In addition, pleasant and modern accommodation for older people can help free-up larger family sized Council accommodation which is currently under occupied.

Redevelopment Case

- 2.07 Works to improve the existing building will be costly and would inadequately address many of the issues around internal space and accessibility. It would also reduce the provision of homes at the site (by the conversion of unfavourable bedsit accommodation into larger flats).
- 2.08 With the above background in mind the redevelopment of the site is the most appropriate approach to address the issues with the current building and to help address the ongoing need for older person accommodation in Portchester.
- 2.09 The site is also in a perfect location for older person accommodation in terms of its sustainability and accessibility. Accessibility is an extremely important factor for older person accommodation. This is explored further as part of the Exception Test.

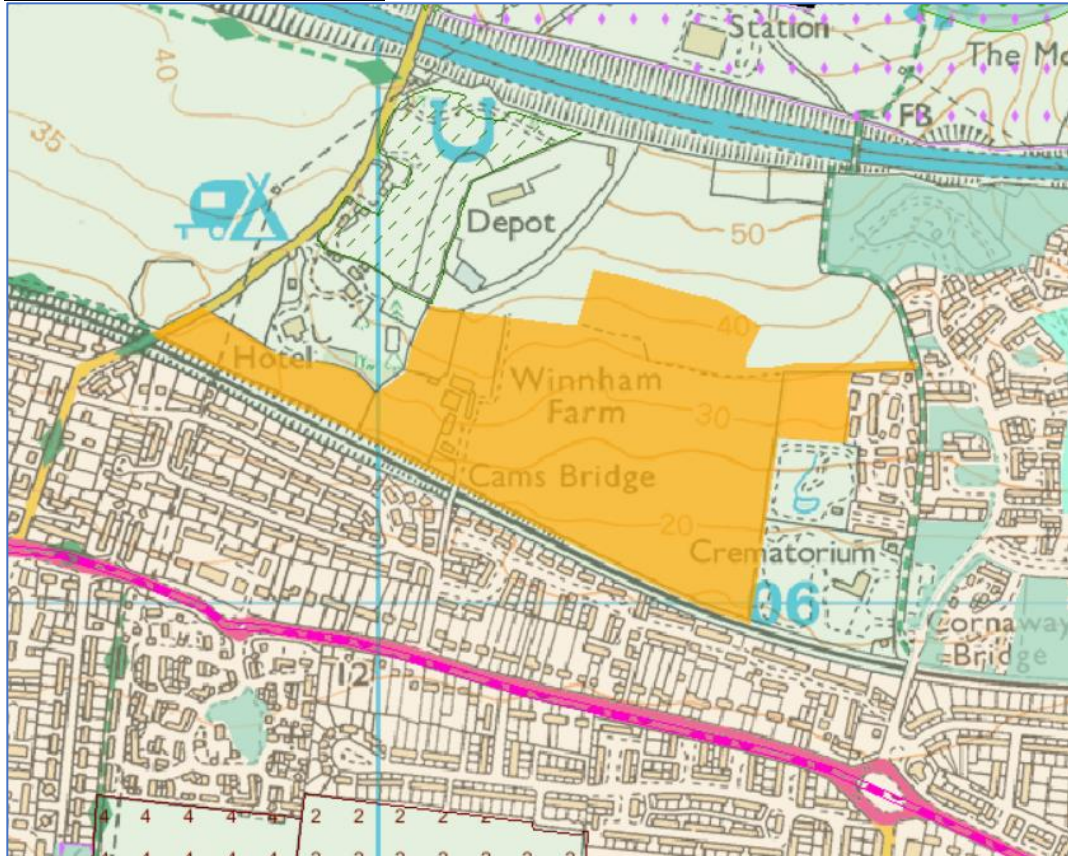
Alternative Site Search Area

- 2.10 The analysis of affordable housing need in the Borough is broken down by area. This is important as somebody in housing need who has a family and/or support network in Portchester is unlikely to be willing to be housed in other areas of the Borough (for example in Warsash). Considering the needs of the individual is important for the social and mental wellbeing of perspective residents.

- 2.11 Having identified the older person affordable housing need for Portchester (as per paragraph 2.6), this Sequential Test will focus on Portchester for any other suitable sites that might be at a lesser risk of flooding.

Other Sites in Portchester

Site 1: Downend Road East



Address of Site: East of Down End Road (access from Downend Road)

Local Plan Status: Site allocation in emerging plan (HA04)

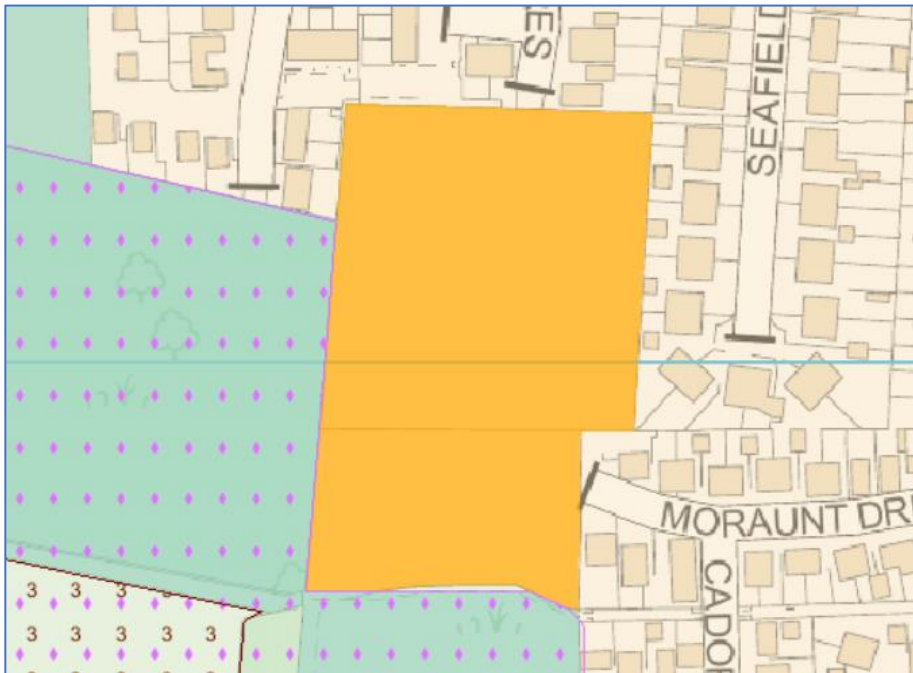
Status: Under option from developer and planning already progressed to secure residential development

Flood Zone: 1

Availability/Suitability: The site is not available as it is already under option with a developer, with plans progressed. The site is also not suitable for older persons due to the distance to main shops and facilities (approx. 2km); this made worse by the fact the site is positioned on the slopes of Portsdown Hill (with the gradient of the hillslope adding to the lack of suitability for older persons accessibility).

Conclusion: NOT available or suitable.

Site 2: Moraunt Drive (HA12)



Address of Site: Land at Moraunt Drive, Portchester

Local Plan Status: Site allocation in emerging plan (HA12)

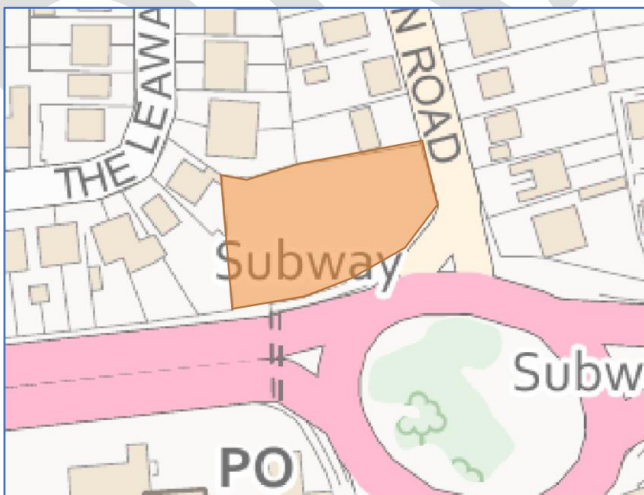
Status: The site will shortly be developed by an Affordable Housing Provider

Flood Zone: 1 [tbc]

Availability/Suitability: The site is not available. It has planning permission and is due to be developed by a local Affordable Housing Provider. It is also less suitable due to its distance (approx. 1.2km) from main local shops and services.

Conclusion: NOT available or suitable

Site 3: Land at Station Road



Address of Site: Land at Station Road, Portchester

Local Plan Status: in urban area

Status: The site is owned by Fareham Borough Council and is under construction for affordable sheltered housing.

Flood Zone: 1 [tbc]

Availability/Suitability: The site is not available as it is already committed to a 16No. sheltered housing scheme. Construction works began in December 2021. This site development will not meet the sheltered housing need in the Portchester area.

Conclusion: NOT available as an alternative to meet need.

Further Sites

- 2.12 No further sites of sufficient size have been identified in the Portchester area. This has included a search looking for potential windfall sites. Portchester is in general terms a built-up urban area and there are no sites of sufficient scale to accommodate this sheltered housing flatted scheme. Although there are some flatted schemes with planning permission in the district centre (flats above existing shops) these are not suitable as they would not provide any amenity or communal space for residents, and they tend not to include or enable lift access.

Conclusion

- 2.13 There are no suitable alternative sites that could accommodate a sheltered housing flatted scheme of the proposed scale (or similar) in Portchester.
- 2.14 The existing urban area does not present any opportunities and existing and emerging local plan sites are unsuitable and/or unavailable for this purpose. Any future urban extensions would only be available at a considerable distance from shops and facilities. This would not be suitable for the occupants of sheltered housing.
- 2.15 The above is considered to adequately satisfy the Sequential Test. The Exception Test therefore needs to apply.

3.0 EXCEPTION TEST

- 3.01 The Sequential Test has shown that there are no suitable and/or available alternative locations for the proposed development in the Portchester area. The Exception Test also needs to be completed for the proposed development.
- 3.02 The purpose of the Exception Test is to demonstrate, and to help ensure, that flood risk to people and property will be managed satisfactorily. It also provides an appropriate point to highlight the wider sustainable benefits and reasons/justification for the proposal.

Wider Sustainability Benefits

Affordable Housing Strategy

- 3.03 The Council's adopted Affordable Housing Strategy (2019) identifies several important points pursuant to the wider sustainability benefits and need for, the proposed development: -

- That Fareham Borough has five distinct communities: Portchester being one of these (this further explaining the approach to the Sequential Test)
- That Fareham has experienced the largest rise in the number of residents aged 85+ in Hampshire during the last 20 years
- Over 20% of the Borough's population are over 65
- There is an opportunity to improve the quality of some existing older person's affordable housing
- That the current level of need for affordable homes in the Borough is in the region of 3,000 households (likely review of this aspect anticipated in 2022/23)
- That the Council's waiting list (Housing Register) currently stands at around 1,000 households (likely review of this aspect anticipated in 2022/23)

- 3.04 The adopted Affordable Housing Strategy (2019) also specifically identifies Assheton Court (the proposed development site) as a Sheltered Housing project aimed at improving facilities (Objective 3 of the adopted Strategy).

Regeneration (vibrancy and vitality) of Portchester District Centre

- 3.05 In 2017 the Council undertook public consultation, and subsequently produced a document relating to the regeneration of Portchester District Centre; the 'Putting the Village Back in Portchester' identified five key areas for improvement. One of those key areas was 'reinvigorating the village centre [by] encouraging redevelopment proposals that will improve the look and vibrancy of the precinct'. Although this did not directly relate to the Assheton Court site, Assheton Court immediately borders the district/village centre and a modern redevelopment on the site will positively contribute to the vitality and viability of the centre.

Adopted Local Plan

- 3.06 The adopted Local Plan Core Strategy includes Strategic Objective 04. This seeks to increase the vitality, viability and accessibility of centres, including the enhancement of Portchester District Centre.
- 3.7 Current and emerging policies also support development within the existing urban area, and on brownfield sites.

Emerging Local Plan

3.08 Fareham Borough Council is progressing a new Local Plan which increasingly carries weight due to its stage in the plan making process. The emerging Local Plan 2037 (submitted for examination in September 2021) identifies the following points relevant to the proposed application and its wider sustainable benefits: -

- 'Applicants for sheltered housing represent approximately 14% of those waiting for any type of housing [from the Council's Housing Register]'
- This need is projected to increase between 2020 and 2037
- 'The greatest increases in demand for [sheltered] units are expected to be witnessed in Portchester and Fareham South (paragraph 4.21 of Revised Publication Version)

3.09 National and Local policies also support the use of brownfield land and sustainable development.

Safety of the Development and the Occupants

The Existing Building

3.10 The existing building at Assheton Court contains 33 flats. There is no flood mitigation or resilience measures incorporated within that original design and the finished floor level is 3.5m AOD. The existing building at Assheton Court includes 16 ground floor flats.

The Proposed Development – Resilience

3.11 Although the proposed redevelopment of Assheton Court will include a greater number of residential units, only 14 will be at ground floor. This reduces the amount of sleeping accommodation at most risk from residual flooding.

3.12 As detailed in the accompanying Flood Risk Assessment (FRA) [to accompany the planning application] the finished floor height will be raised to 4.28-4.58m. This will address the potential flood risk at a 1 in 200 event and be a significant improvement to the current floor levels at the site. The finished floor height is also intended to recognise achieving an acceptable overall design and appearance of the building.

3.13 The expected lifetime of the development is likely to be 60-100 years. In this time it is expected that the building will be owned and controlled by Fareham Borough Council. As a responsible public body, the Council's housing department can work with tenants to help ensure the risk to property and person is minimised.

3.14 Standard flood resilience measures can also be built into the new design. This includes the location of electric sockets out of residual flood water depths, appropriate plumbing installations, non-return valves, careful choice of materials (in terms of their permeability and drying/cleaning after any flood event).

3.15 As this development will be by and for Fareham Housing (as opposed to open market sale) it will be in the Council's interest to ensure that appropriate measures are in place from the start, for the longevity of the building and safety of the occupants.

3.16 Refuge points at first floor level can be provided including a means of external access should a rescue situation need to occur.

The Occupants – Awareness and Refuge/Rescue

- 3.17 The property will remain owned and managed by Fareham Housing (Fareham Borough Council) and therefore full management can take place to ensure residents are signed up to the flood warning service and that suitable evacuation procedures are in place. The Council also have an out of hours service and have emergency planning responsibilities.
- 3.18 The site is at risk of tidal flooding rather than fluvial. It is therefore reasonable to assume that a flood event is more likely to be predicted in advance (tide times/weather conditions) and therefore can be appropriately managed, including evacuation if required. The risk of fast flowing waters and/or debris is also less than might occur in a fluvial flood event.

Wider Flood Mitigation/Defence

- 3.19 The Environment Agency and the Eastern Solent Coastal Partnership (ESCP) have developed plans to reduce the risk of flooding along the coastal stretch from Portchester to Paulsgrove.
- 3.20 In February 2018 the Environment Agency approved the technical and financial approval for the next stages of the project. The project involves the installation of defences to reduce the risk of coastal flooding, designed to a 1 in 200-year standard of protection for the next 15 years.
- 3.21 Although the entirety of required funding is not currently in place for these defences, a 'hold the line' tactic has been identified. It is of note that a significant number of businesses and residential properties would be affected by a coastal flood event in advance of the development site. This includes listed buildings, a Conservation Area and a Scheduled Ancient Monument. Although full funding for the project cannot be demonstrated at this time, it is reasonable to have some confidence that a solution will be found.
- 3.22 The proposed redevelopment of the site is not expected to increase flood risk elsewhere as the works are not expected to displace potential flood water storage, as identified in the accompanying Flood Risk Assessment for the site.
- 3.23 [Insert any relevant details relating to SUDS]

Discounted Mitigation Options

- 3.24 It is not possible to provide all sleeping accommodation at first floor level or above. This would result in fewer dwellings being incorporated with the redevelopment scheme (as building higher than proposed is not an option due to design/neighbour considerations). Build costs are likely to remain similar regardless of whether ground flats are provided or not (by effectively having an excessive and unnecessary large ground floor space or stilted development). This would then detrimentally impact the financial feasibility of the project to a degree whereby the redevelopment could not be justified.

Conclusion

- 3.25 Following the Sequential Test for the Assheton Court redevelopment demonstrating that no other suitable or available sites exist for the proposal, an Exception Test has also demonstrated how the development is justified and acceptable on flood risk grounds.

3.26 This Exception Test has demonstrated and explained the following (summarised): -

Wider Sustainable Benefits

- Providing much needed affordable older person accommodation in the right type of location (i.e. highly accessible)
- Provide modern older person accommodation (more accessible units etc)
- Utilising brownfield land
- Positive contribution toward wider regeneration of Portchester District Centre

Safety of Development/Occupants

- Fewer flats at ground floor level than at the current property (14No. rather than the current 16No.)
- A higher finished floor level at 4.28m and 4.58m AOD compared to 3.5m AOD (the higher finished floor height in the area of the site at greater risk of flooding)
- The building to be owned/managed by a public body with out of hours and emergency planning functions
- Flood resilience measures incorporated (raised electrics at ground floor, choice of materials etc.)
- Flood warning and evacuation procedures in place
- Refuge/rescue points above ground floor (although not expected to be required with appropriate warning/evacuation procedures)
- Tidal flood risk more predictable in advance, flow risk lower than fluvial flooding

Future Wider Flood Protection

- Technical approval in place for flood defence approval as part of ESCP's Portchester to Paulsgrove project

3.27 The PUSH Strategic Flood Risk Assessment (2016 Update) and the Strategic Flood Risk Assessment for Fareham (2021) have informed the basis of this Sequential and Exception Test for the Assheton Court site. This also includes having regard to Policy CC2 of the emerging Local Plan.

3.28 The Exception Test for the proposed redevelopment of Assheton Court has sufficiently demonstrated that there are wider benefits to the community which outweigh flood risk, that proportionate mitigation will put in place, that the development will be safe over its lifetime, and significantly safer than the existing building at the site.