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# SEQUENTIAL TEST STATEMENT

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Former Hanson and J C Phillips & Sons Depots, Land to  
the rear of 156-162 South Street, Bridport, DT6 3NP

**planning***issues*  
TOWN PLANNING AND ARCHITECTURE

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## EXECUTIVE SUMMARY

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- I. This Sequential Test Statement has been prepared by Planning Issues Limited, on behalf of Churchill Retirement Living, and is submitted in support of the appeal on this site. A Sequential Test Statement was submitted with the detailed planning application for the proposed retirement living development at the Former Hanson and J C Phillips & Sons Depots, Land to the rear of 156-162 South Street, Bridport, DT6 3NP.
- II. This Sequential Test Statement identifies the flood context, undertakes the sequential test and assesses this against the relevant national, regional and local planning policies.
- III. The Applicant is a retirement property house builder based in the United Kingdom. They specialise in developments of purpose built apartments for older homeowners and currently has more than 170 retirement developments across the United Kingdom.
- IV. The Applicant proposes the demolition of existing building and redevelopment of the site to form 48 retirement apartments, 25 retirement cottages together with communal facilities, access, car parking and landscaping. The application also includes a change of use of the former police station to community or office uses.
- V. *'The aim of the Sequential Test'*, as detailed within the Planning Practice Guidance, is to ensure that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the Test. 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, local planning authorities in their decision making should take into account 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), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.
- VI. *'Retirement Living Explained - A Guide for Planning and Design Professionals'* lists twelve essential design characteristics to a successful retirement living accommodation development for older people within the UK. An understanding of these criteria has been used to determine the suitability of sites under the sequential test.
- VII. This sequential test has reviewed the Local Plan, the Neighbourhood Plan, the Strategic Housing Land Availability Assessment, the Council's Brownfield Land Register, sites within Bridport that have submitted a planning application in the last five years for additional residential development, and any sites being marketed at the current time of writing this report.

VIII. This assessment concludes that there are currently no available sites in Bridport that are available and suitable for a retirement living development in a lower probability flooding area. Thus the sequential test is considered to be passed for the proposed development at land to the rear of 156-162 South Street

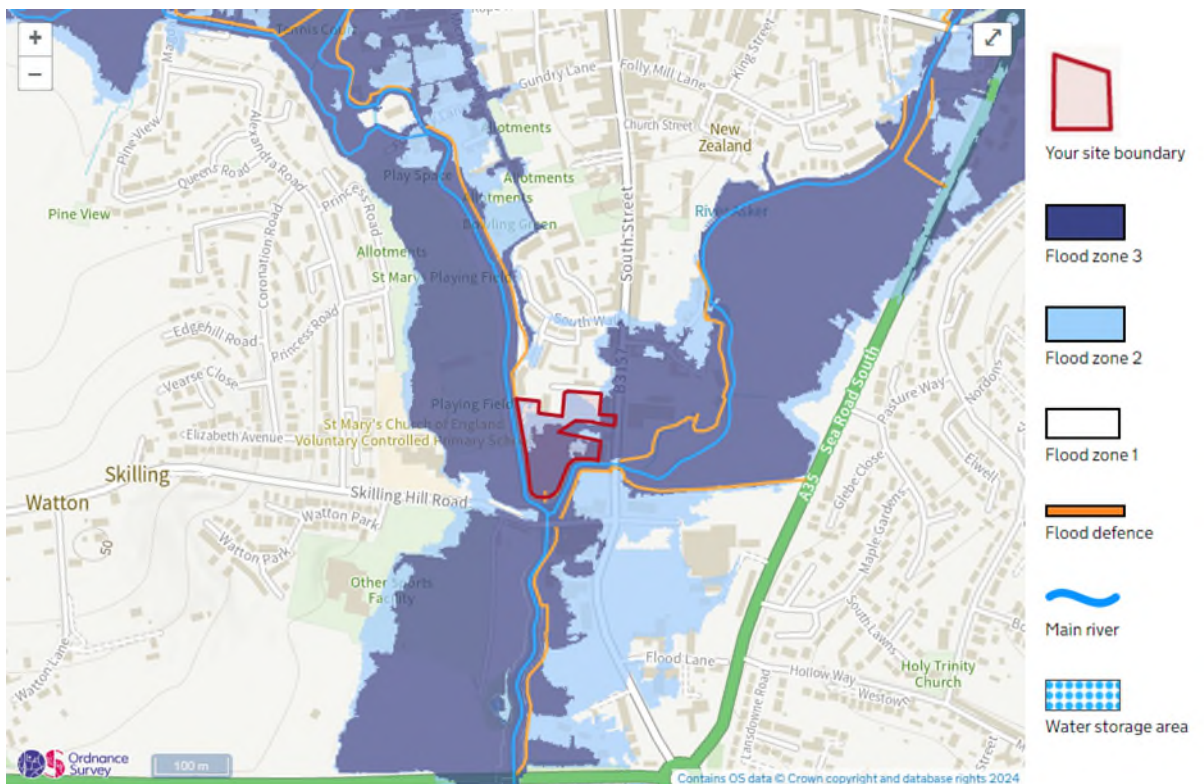
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# 1. INTRODUCTION

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- 1.1 This Sequential Test Statement has been prepared by Planning Issues Limited, on behalf of Churchill Retirement Living, and is submitted in support of an appeal for the proposed retirement living development at Former Hanson and J C Phillips & Sons Depots, Land to the rear of 156-162 South Street, Bridport, DT6 3NP
- 1.2 The site comprises the former quarry and paving merchant depots.. The northern parcel of the site which was the former quarry depot vacated in..... The southern half of the site remains in operation with the intention for them to close in..... ,
- 1.3 The site is located to the south of the Bridport town centre, as well as the medical centre and other local services and facilities. It is in a highly sustainable location.
- 1.4 As set out below part of the site is within Flood Zone 2 and 3. The site does benefit from a flood defence wall around the perimeter of the site.



- 1.5 As set out within the NPPF and Policy ENV5 (Flood Risk) of the adopted West Dorset, Weymouth and Portland Local Plan 2015, development within sites at any risk of flooding will only be acceptable if it is demonstrated that there are no suitable available alternative sites at a lower flood risk. Paragraph 168 of the NPPF sets out that “*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*”.

- 1.6 This sequential test sets out the requirements for and benefits of older people's housing. It then reviews the Local Plan, the Neighbourhood Plan, the Strategic Housing Land Availability Assessment, the Council's Brownfield Land Register, sites within Bridport that have submitted a planning application in the last five years for additional residential development, and any sites being marketed at the current time of writing this report.

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## 2. PROPOSED DEVELOPMENT

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- 2.1 This application seeks permission for the demolition of the existing buildings and redevelopment of the site to form 48 retirement apartments and 25 cottages including communal facilities, access, car parking and landscaping.
- 2.2 The application is made by Churchill Retirement Living, a UK based privately owned family run company. They specialise in developments of purpose built apartments for older homeowners and currently have more than 170 retirement developments across the United Kingdom.
- 2.3 The development primarily consists of 1 and 2 bedroom apartments and 2 bedrooled cottages which are all restricted to people of 60 years or over, or those of 60 years or over with a spouse of partner of at least 55.
- 2.4 Notwithstanding the age restriction, it is found that the average age of purchasers of the apartments are 79 years old and that they are typically occupied by a widow. The decision to purchase this type of development is predominantly needs based following a significant life event such as a fall or the death of a partner.
- 2.5 The communal facilities which are included within the developments are as follows:
- A lodge manager
  - A video entry system
  - An owners lobby
  - A communal landscaped garden
  - An Owners Lounge
  - A guest suite
  - A communal toilet
  - A communal bin store
  - A communal car parking area
  - Mobility scooter charging store
- 2.6 It is well documented that the UK faces an ageing population. One in four people will be over 65 by 2050, increasing from 19% in 2019. In 2018, there were 1.6 million people aged 85 years and over; by mid-2043 this is projected to almost double to 3 million. As acknowledged above, the recent House of Lords Built Environment Committee Report requires that new homes built must reflect this ageing population, particularly as there will be an increase in older people living alone (January 2022). The Planning Practice Guidance sets out that providing housing for older people is now '*critical*'<sup>1</sup>.
- 2.7 The PPG goes on to acknowledge that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.

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<sup>1</sup> Planning Practice Guidance, Paragraph: 001 Reference ID: 63-001-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

- 2.8 There is a significant national drive to increase housing delivery. Para 60 of the NPPF is clear, the Government intends to significantly boost the supply of new homes. There is an intention to deliver 300,000 new homes a year. The PPG is unequivocal in its message that “*the need to provide housing for older people is **critical***”.
- 2.9 There is a huge need for more housing options for the ageing population both nationally and within Dorset. The PPG is clear: “*where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need*”.
- 2.10 The proposal seeks to deliver 73 no. retirement living dwellings on a brownfield site. In accordance with the NPPF (para 124c) substantial weight should be given to the value of using suitable brownfield land within settlements for homes.
- 2.11 The site is in a highly sustainable location. It offers opportunities for the future residents to walk to a range of services and facilities within the town centre. This is particularly important as people age, with many having to give up driving. It also offers the opportunity to allow residents to remain as active part of their local community.
- 2.12 The provision of retirement housing releases under occupied family homes back into the housing market. This in turn enables moves throughout the whole housing market, benefiting everyone including first time buyers.
- 2.13 Other economic benefits associated with the application include:
- Savings to the NHS and social care services of £3,500 per person per year in retirement living accommodation, totalling £231,000 savings per year.
  - Increased spending in local shops and services of around £875,500 per annum
  - Creation of around 62 construction jobs, 69 supply chain jobs, 4 direct jobs and 8 supported jobs from increased expenditure in the local area from the retirement living scheme.
  - The change of use to the community or employment use of the former police station will also bring wider economic benefits.
- 2.14 Social benefits of the proposed development include:
- Encouraging independence in later life with suitably designed housing. Reducing reliance on residential and nursing care.
  - Providing safety and security and reducing management and maintenance concerns.
  - Companionship, reducing loneliness and social isolation.
  - Entertainment and social gatherings
- 2.15 These social benefits are vital for mental health and quality of life as people age, reducing loneliness and providing safety and security.
- 2.16 The environmental benefits include:
- Efficient use of brownfield land, reducing the need for greenfield release
  - Close proximity to shops and facilities encouraging residents to walk

- Shared facilities for residents in a single building makes efficient use of energy and resources.
- Use of renewable energy enabling a reduction of CO<sup>2</sup> emissions
- Water efficiency standards of 110 litres per person per day.
- The scheme will deliver a biodiversity net gain.

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## 4. METHODOLOGY

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- 4.1 The PPG sets out '*What is the sequential, risk-based approach to the location of development?*'<sup>2</sup> and the general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk.
- 4.2 '*The aim of the Sequential Test*' is detailed within the PPG. The flood zones as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the Test. 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, local planning authorities in their decision making should take into account 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), applying the Exception Test if required.
- 4.3 For individual planning applications where there has been no sequential testing of the allocations in 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.
- 4.4 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.
- 4.5 The West Dorset District Council Strategic Flood Risk Assessment (August 2010) Level 2 and Dorset Council Level 1 Strategic Flood Risk Assessment (February 2023) sets out the Environment Agency's procedure for applying the Sequential Test. This is as follows:
- i. State the name and location of the reasonably available site options being compared to the application site
  - ii. Indicate whether flood risk on the reasonable available options is higher or lower than the application site. State the Flood Zone or SFRA classification for each site.
  - iii. State the approximate capacity of each reasonably available site being considered. This should be based on: the density policy within a Local

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<sup>2</sup> *Planning Practice Guidance, Paragraph: 018 Reference ID: 7-018-20140306. Available here: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach>*

Development Document (LDD) the current Strategic Housing Land Availability Assessment for the district past performance

- iv. Detail any constraints to the delivery of identified reasonably available options; for example, availability within a given time period or lack of appropriate infrastructure i.e. flood defences which protect the site through its design lifetime. This part of the test should include recommendations on how these constraints should be overcome and when

4.6 Following this procedure, the typical requirements for a successful retirement living development are:

- A high profile location, on active roads with good transport links;
- Within 0.5 miles of town or local centres and amenities;
- On brownfield land;
- 0.4 to 1.5 acres

4.7 The map below sets out the 0.5mile radius around the town centre. Sites must be within this radius to be considered suitable. Residents are often looking to move into town centre locations so that they can give up their car and can still access the goods and services they need within a suitable walking distance. Experience has shown that outside this half mile radius is just too far for residents to consider.



4.8 Churchill Retirement Living are looking to deliver a development within Bridport to meet local housing needs and the applicant considers it is not appropriate to expand the catchment area borough-wide.

4.9 In order to identify a source of sites the following have been used:

- West Dorset, Weymouth and Portland Local Plan
- Emerging Dorset Local Plan Evidence Base
- Strategic Housing Land Availability Assessment,
- Brownfield Register,
- the Councils planning register for sites with planning permission for residential development within the last 5 years; and
- sites currently on the market.

4.10 The Environment Agency flood map for planning has been used to compare the flood risk between sites, together with an assessment of availability and suitability for retirement living accommodation.

4.11 The assessment of the sites is set out within the next chapter together with a conclusion on the availability of other suitable sites.

## 5. ASSESSMENT

5.1 As set out in the Guidance, the area to which the Sequential Test should be applied should be defined by local circumstances relating to the catchment area of the type of development proposed. As set out above the search is being applied to the parish of Bridport, although more specifically to the 0.5 mile radius from the town centre which is required for a successful retirement living development.

5.2 The sites are considered below, with a table of all the sites considered in Appendix A.

### Development Plan

5.3 The adopted Local Plan includes five housing sites, which are in Bridport. These are:

- BRID1 – Land at Vearse Farm
- BRID2 – Land off Skilling Hill Road
- BRID3 – Land to the East of Bredy Veterinary Centre
- BRID4 – Future Town Centre Expansion
- BRID5 – St Michaels Trading Estate

5.4 There are no sites within the Bridport Neighbourhood Plan

5.5 The Regulation 18 Dorset Local Plan consultation (March 2021) contained 5 proposed site allocations (3 were carried over from the adopted Local Plan), It should be noted that the emerging Dorset Local Plan is currently being revised following the merging of the Councils. The 5 sites are:

- BRID2 - Bridport: Vearse Farm Urban Extension – capacity 930
- BRID3 - Bridport: Land to the East of Bredy Veterinary Centre – capacity 40
- BRID4 - Bridport: St Michael’s Trading Estate – capacity 91
- BRID5 – Bridport Gateway Care Village – capacity 25
- BRID6 - Bridport: Adj. Bridport Hospital – capacity 53

5.6 An assessment of these sites are as follows:

Site	Assessment	Available and suitable as a sequentially preferable site
Land at Vearse Farm	Approval Granted in June 2023 and S73 application granted in January 2024 for 760 dwellings. Land secured by national house builder and therefore the site is not available. The site is also in excess of the 0.5m threshold	Discounted
Land off Skilling Hill Road	The site remains operational and is therefore not available for development	Discounted
Land to the East of Bredy Veterinary Centre	50% of the site is outside of the 0.5m distance as shown in the map above. The site is a 850m walk to the edge of the town centre and 920m to the centre. There are significant levels changes that would not be	Discounted

	appropriate for an older person. The site has therefore been discounted.	
Future Town Centre Expansion	1.8ha site within the town centre however has numerous heritage constraints and is included within the SHLAA for 20 units at a density of 50dph which would not be a sufficient capacity for an RL development. The SHLAA site review states the land would be deliverable in 11-15 years.	Discounted.
St Michaels Trading Estate	Site falls entirely within Flood Zones 2 and 3. There is a listed building on the site which requires retention which restricts the developable area.	Discounted

### Strategic Housing Land Availability Assessment

5.7 The Council published their Strategic Housing Land Availability Assessment (SHLAA) in 20187. 9 sites have been identified in the SHLAA, covering the Bridport area. Only 6 of these sites were taken forward. The sites are:

- Bradford Builders Merchants (LA/BRID/002) - Capacity 27 dwellings
- Coach Station Square (LA/BRID/003) - Capacity 40 dwellings
- Proto Garage and Works (LA/BRID/004) - Capacity 7 dwellings
- Rope Walks Car Park (LA/BRID/005) - Capacity 20 dwellings
- Sidney Gale House Site (LA/BRID/001) - Capacity 24 dwellings
- St Swithins Road - (LA/BRID/006) - Capacity 12 dwellings

5.8 An assessment of these sites are as follows:

Site	Assessment	Available and suitable as a sequentially preferable site
Bradford Builders Merchants	The site is fully within flood zone 3. The SHLAA assessment advises of a potential dph of 50 and 27 dwellings which would not be practical for a retirement development. Estimated delivery is also 11-15 years and not immediately available.	Discounted
Coach Station Square	The site is 98% in FZ2 with no defences. A designated Neighbourhood Plan area for primary (and enhanced) use as a transport hub. Estimated delivery is also 11-15 years and not immediately available.	Discounted
Proto Garage and Works	The site is only 0.21ha with a potential for 7 dwellings. This site is not appropriate for a retirement development.	Discounted
Rope Walks Car Park	1.8ha site within the town centre however has numerous heritage constraints and is included within the SHLAA for 20 units at a density of 50dph which would not be a sufficient capacity for an RL development. The SHLAA site review states the land would be deliverable in 11-15 years.	Discounted.
Sidney Gale House Site	The site is in excess of 0.5miles from the town centre. The SHLAA sets out the	Discounted

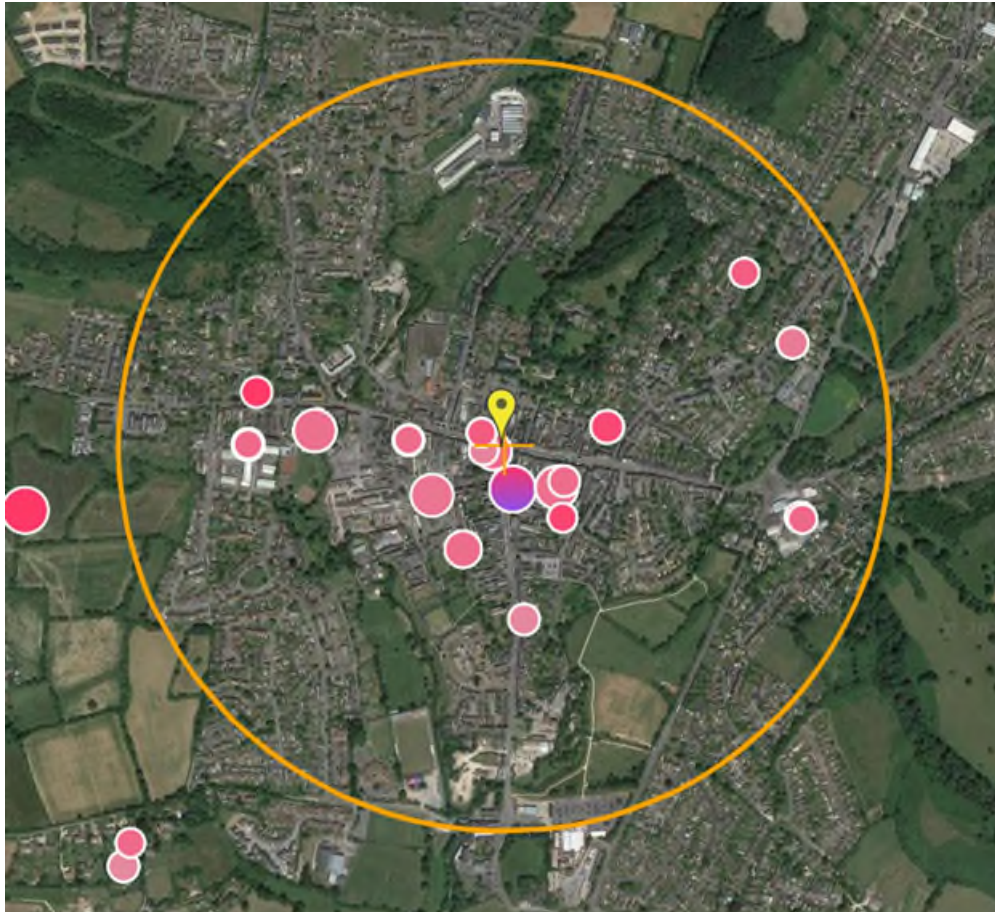
	potential for 24 dwellings with a 50dph potential. The site also has an anticipated delivery between 11-15 years.	
St Swithins Road	Developable site area of 0.24ha. The SHLAA advises of a potential yield of 12 units with a density of 50dph. This is considered to be too small a site for a retirement development.	

#### The Brownfield Land Register

- 5.9 Dorset Council published their Brownfield Register in April 2020. 6 sites within the Brownfield Register are within Bridport and are all sites which have been previously reviewed above. The sites are:
- Flood Lane (Sidney Gale House)
  - Bradford Buildings Merchants
  - Coach Station Square
  - Proton Garage and Works
  - Rope Walks Car Park
  - St Swithins Road

#### Planning Register

- 5.10 The map below shows all of the residential planning applications within the last five years within Bridport. A detailed assessment of these is included in Appendix A. This assessment only included residential applications that create additional residential units, householder and advertisement applications have been discounted.
- 5.11 This revealed no alternative suitable sites for retirement living accommodation within Bridport, with the majority of sites being too small.



Other sites considered

5.12 At the time of writing this sequential test, there are no other sites on the market within Bridport with potential for retirement housing.

5.13 These are considered in more detail in the table below:

Site	Assessment	Available and suitable as a sequentially preferable site
Oxenbury & Sons, Gundry Lane, Bridport DT6 3RJ	The site is a grade II listed building comprising of circa 600m <sup>2</sup> .  Due to the size and listed status of the buildings on this site, it would not be appropriate.	Discounted
Hope & Anchor, 13 St. Michael's Lane, Bridport, Dorset, DT6 3RA	The site is a grade II listed building and is also a very small site on a corner plot  Due to the size and listed status of the buildings on this site, it would not be appropriate.	Discounted

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## 6. CONCLUSION

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- 6.1 This sequential test has been undertaken in relation to the proposed redevelopment of the former Hansons Depot, Bridport for retirement living accommodation.
- 6.2 This assessment has considered alternative sites within Bridport Parish and particularly within 0.5 mile radius of the town centre. This is important for retirement living developments to allow residents to walk, or use a mobility scooter, to access local shops and services.
- 6.3 The sequential test has considered the development plan, the Council's Strategic Housing Land Availability Assessment, the Brownfield Land Register, the planning register for sites with planning permission in the last five years as well as a number of other speculative sites that Churchill have considered on the market.
- 6.4 The assessment has shown that there are no reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding in Bridport. The sequential test is therefore considered to have been passed and the proposed development complies with the NPPF.
- 6.5 Although the sequential test has been passed, the exception test will need to be considered. The exception test is set out in the Flood Risk Assessment that has been submitted in support of the planning application.

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APPENDIX 1

Sequential Test Review

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## Sites with planning permission for residential development in the last 5 years

Site	Proposal	Decision and Ref	Assessment
22 West Allington, Bridport, DT6 5BG	Change of use from existing single dwelling into two separate dwellings	Approved P/FUL/2024/01588	Site is 494m <sup>2</sup> which is too small for this scheme.
West Rivers House, 13 West Allington, Bridport, Dorset, DT6 5BJ	Conversion of existing 4no. flats into 8no. flats	Approved P/FUL/2021/00148	The site was for conversion and not redevelopment. Site shape does not allow for proposed use.
Beach And Barnicott, 6 South Street, Bridport, DT6 3NQ	To reinstate the 4 bedroom flat which existed before the bar/restaurant was established in 2005, with the addition of 2 ensuite bathrooms	P/PAMF/2023/06016	Site not large enough and for conversion.
11 East Street, Bridport, Dorset, DT6 3JU	Change of use from use class Sui Generis (Garage for vehicle repair, MOT Testing & Diagnostics) to use class C3(a) (Dwelling houses) to provide 2x 2 bed dwellings. Extension to the existing building and erection of a two storey building to provide a further 9x 1 bed new dwellings/flats.	Approved P/COU/2021/01779	Site is not large enough to accommodate a suitable retirement living development and is for conversion rather than redevelopment
19 South Street, Bridport, Dorset, DT6 3NR	External alterations to create 2No. flats and a commercial unit.	Prior Approval Required and Approved (11th September 2017)  17/01970/PNBIC3	Site not large enough
Former Chancery House Day Centre, Chancery House, Chancery Lane, Bridport, Dorset, DT6 3JT	Conversion to form 8No. flats	Approved P/FUL/2021/00316	Site not large enough and for conversion
Brigade Hall, Rax Lane, Bridport, DT6 3JJ	Demolition of existing building and erect terrace of three dwellings. containing	Approved P/FUL/2023/02831	Site not large enough

	two flats and associated works.		
First Floor Flat, 13 - 15 West Street, Bridport, DT6 3QJ	Change of use from 1st floor hairdressing salon to one bedroom residential unit.	P/FUL/2022/02050	Site not large enough
Land Rear Of Assembly Rooms , Gundry Lane, Bridport	Erection of 5 no. dwellings with associated access and parking area	P/FUL/2021/01209	Site not large enough
95 South Street, Bridport, DT6 3NZ	Sub-divide existing dwelling to form 2 dwellings and replace existing first floor window	WD/D/19/002071	Site not large enough
3 Gundry Lane, Bridport, DT6 3RJ	Change of use from Office Use (Class B1(a)) to a dwellinghouse (Class C3)	WD/D/19/002805	Site not large enough
17 Hardy Road (land adjacent), Bridport, DT6 3AZ	Outline application for erection of detached dwelling, garage and access. Application to agree means of access with all other matters reserved	P/OUT/2022/01183	Site not large enough
80 St Andrews Road, Bridport, DT6 3BL	Make internal alterations to sub-divide existing flat and extra accommodation into two separate flats.	WD/D/20/001332	Site not large enough