

Sequential Test Statement



Site: Land to the Rear of Banyers Hotel, King James Way, Royston, Hertfordshire

Proposal: Residential development to provide 9 flats with associated vehicular parking and access via existing dropped kerb from King James Way with ancillary bike and refuse store - Land to the rear of Banyers Hotel King James Way Royston Hertfordshire SG8 7BZ

Planning Reference : 25/00104/FP

This statement has been prepared in response to the consultation response received from the SuDS and Watercourses Team at Lead Local Flood Authority of Hertfordshire County Council and to accompany the planning application for the above site and to address the requirement for a Sequential Test (ST) in relation to flood risk.

The Lead Local Flood Authority (LLFA) previously raised a query regarding the requirement for a Sequential Test in connection with the above proposal. Since that time, the Planning Practice Guidance has been updated, clarifying that a proportionate approach should be taken in applying paragraph 175 of the National Planning Policy Framework (NPPF).

The updated Guidance (October 2025) now states:

"In applying [NPPF] paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."

(Source: *Flood Risk and Coastal Change*, Paragraph: 033 Reference ID: 7-033-2025, available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#full-publication-update-history>)

In accordance with the updated Planning Practice Guidance, the submitted Flood Risk Assessment and Drainage Validation Report provides a clear and proportionate demonstration that the proposed development will remain safe for its lifetime and will not increase flood risk elsewhere. On this basis, it is considered that the **Sequential Test is not required**.

The applicant respectfully requests that this position is accepted and that the application be determined on this basis.

Harry Breeden BA(Hons) Architecure - Barker Associates, acting as Agent.

24/10/2025