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14th February 2022

Ref: NS_0124_56

Dear Bethany

RE: 22/0037: ANCHORSHOLME SERVICE STATION - FLOOD RISK SEQUENTIAL TEST

Thank you for your response regarding the Flood Risk Assessment (FRA) submitted to support the above planning application for demolition of the existing petrol filling station and erection of a convenience store off Fleetwood Road, Anchorsholme. This document provides further details and clarity regarding the proposed development to confirm that the requirement for a flood risk sequential test has been fully assessed, and it should be read in conjunction with the submitted FRA¹.

The application site is located within defended Flood Zone 3, which extends across Anchorsholme and Thornton as indicated on Figure 1 below, extracted from the Environment Agency's online flood zone map.

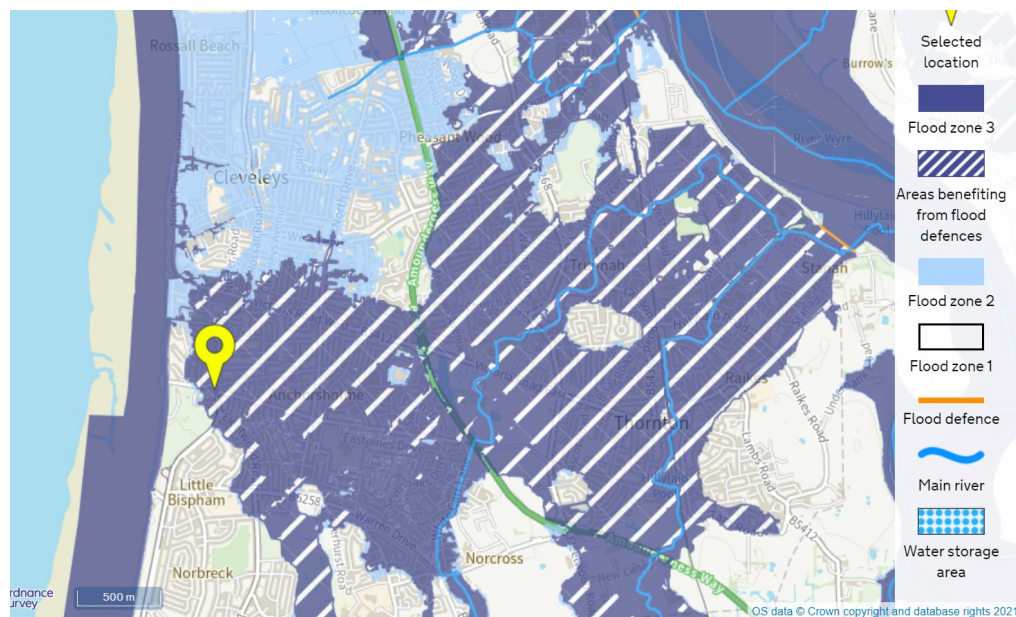


Figure 1. Environment Agency Flood Zone Map

¹ NSugg Ltd., December 2021, Demolition of Existing Petrol Filling Station and Erection of a Convenience Store, Anchorsholme, Thornton-Cleveleys – Flood Risk Assessment. Ref: NS_0124_56.

The site-specific FRA confirms that the application site is at risk of tidal flooding but is protected by local flood defences which were upgraded in 2017. The Environment Agency's online mapping confirms that the actual risk of tidal flooding within the application site is low (0.1% to 1.0% annual probability) to very low (<0.1% annual probability) due to the presence of the flood defences. The FRA recognises the residual risk of flooding to the development, in the unlikely event of a flood defence breach, and appropriate flood risk mitigation measures are proposed including: raising the finished floor level above the predicted flood water level and introduction of a Flood Warning & Evacuation Plan.

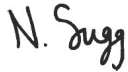
The flood risk sequential test aims to steer new development to areas with the lowest probability of flooding (i.e. Flood Zone 1). The proposed development is considered to satisfy the requirements of the flood risk sequential test based on the following information:

- Virtually the entire suburb of Anchorsholme and the wider Thornton-Cleveleys district is within defended Flood Zone 3. Therefore, restricting new development on the grounds of flood risk (ignoring the presence of defences) would prevent any future new development or re-development of sites within this extensive urban area. The application site currently comprises an underperforming petrol filling station; the applicant is seeking an alternative commercial use for the site to avoid a potential vacant/derelict site.
- The proposed development comprises a convenience store and is of a comparable flood risk vulnerability to the existing development, with both land uses classified as 'less vulnerable'. The proposed convenience store is potentially of lower flood risk vulnerability than the existing petrol filling station with its associated contaminative risks.
- The flood risk sequential test does not apply to a change of use or minor commercial extensions with a footprint of less than 250m². Whilst the development proposals are to re-develop the site, the increase in development footprint is negligible, with the proposed convenience store occupying the footprint of the existing petrol filling station and associated kiosk.
- The existing tidal flood defences benefit the suburb of Anchorsholme, including the application site, reducing the actual risk of flooding to low or very low. The Shoreline Management Plan (SMP2) for North West England and North Wales confirms the following long-term management proposals for flood defences within sub-cell 11b, which includes Blackpool: *the major tourist centre of Blackpool and the residential areas of Thornton and Cleveleys will continue to be defended*. The proposed flood defence policy is to 'hold the line' by maintaining existing defences to an adequate standard, taking into consideration climate change. Therefore, the presence of existing flood defences, with a long-term maintenance and management plan, benefits the application site ensuring future development will be safe from flooding, throughout its lifetime.
- As outlined above, the FRA takes into consideration the residual flood risk, in the unlikely event of a breach of the flood defences, with appropriate flood risk mitigation measures introduced within the development design.
- It is not appropriate for the applicant to consider potential alternative development sites; the proposal is for the re-development of an existing underperforming commercial site owned by the applicant.

The applicant, EG Group, has successfully obtained planning consent for similar commercial developments within defended tidal Flood Zone 3 sites across the UK, including Hull and Kent. The presence of flood defences, alongside the introduction of site-specific flood risk mitigation measures including a Flood Warning & Evacuation Plan ensures the development remains safe throughout its lifetime.

I trust the above information clarifies the nature of the development proposals and flood risk status, to satisfy the requirements of the flood risk sequential test.

With kind regards

A handwritten signature in black ink that reads "N. Sugg". The signature is written in a cursive style with a large, looped 'S'.

Nicola Sugg B.Sc. M.Sc. MCIWEM