

ML PLANNING CONSULTANCY LTD

FLOOD RISK SEQUENTIAL TEST ASSESSMENT

Lavender Cottage
Garstang Road
St. Michaels
Preston
PR3 0TD

OUTLINE PLANNING APPLICATION FOR THE ERECTION OF ONE RESIDENTIAL
DWELLING

September 2023

INTRODUCTION

This statement has been prepared by M L Planning Consultancy Limited to provide evidence that will enable Wyre Council to undertake a Flood Risk Sequential Test. The proposal relates to an outline application for the erection of a detached dwelling to the rear of Lavender Cottage, Garstang Road, St Michaels, Preston PR3 0TD.

The application remains pending and had the reference 23/00101/OUT. It was supported by a Flood Risk Assessment prepared by M L Planning Consultancy Limited, but having validated the application the Council has now requested the submission of a Sequential Assessment as the site lies within Flood Zone 2.

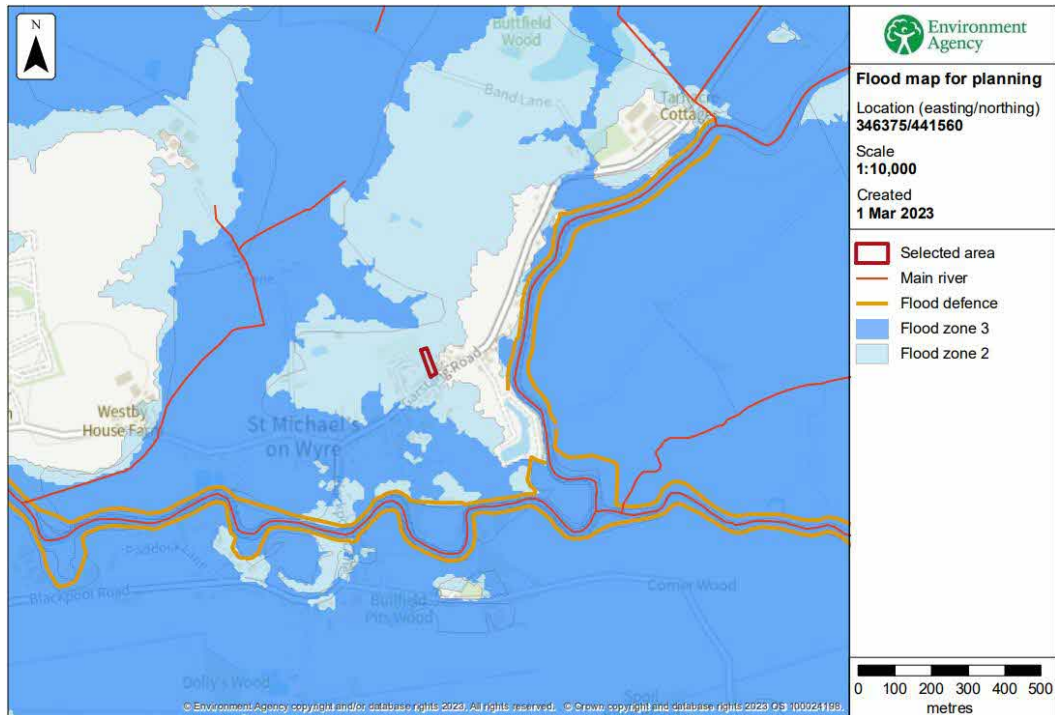
This Sequential Assessment has been carried out in accordance with Section 14 of the National Planning Policy Framework, National Planning Practice Guidance and using the Wyre Council Flood Risk Sequential Test Advice Note.

REQUIREMENTS OF THE SEQUENTIAL TEST

Flood risk is considered on the basis of the following Flood Zones and their probability of flooding defined by the Environment Agency.

Flood Zone	Definition
Zone 1 – Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding.
Zone 2 – Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.
Zone 3a – High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.
Zone 3b – Functional Floodplain	Land where water has to flow or be stored in times of flood.

The planning application site is located within Flood Zone 2:-



Development types are grouped into vulnerability classifications:-

The proposed development comprises residential development in the form of a single dwelling. This is classified as 'More vulnerable - Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels'.

Table 3 (below) sets out that more vulnerable uses are appropriate within Flood Zone 2, subject to passing the Sequential Test.

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 †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Paragraph 162 of the NPPF sets out that the overriding aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding.

METHODOLOGY, CATCHMENT AND SEARCH AREA

Search Area

The Wyre Council Flood Risk Sequential Test - guidance for applicants document sets out the requirement for the geographical area for the sequential assessment:-

'For developments that have a sub-regional, regional or national significance, the sequential test area of search will include the whole borough and areas outside of the borough boundary in line with the catchment area for the development'

'For all other applications the normal area of search is the whole borough'

Whilst the whole of the Wyre Borough is considered disproportionate to the development of a single house, the Planning Officer confirmed by email that a whole borough search would be required.

Comparator Site Threshold

The Wyre Council Flood Risk Sequential Test - guidance for applicants document sets out, for residential schemes, the approach is that the identification of comparator sites should be based on site area AND capacity. The council will normally apply a +/-10% buffer to create a range within which comparator sites can be identified.

The application proposes a single dwelling on a site area of 655sqm (0.06 hectares).

Using the +/- 10% buffer, a comparator site threshold of 589.5sqm (0.058ha) and 720.5sqm (0.072ha) and up to 1.1 dwellings will be considered. Any sites which are outside the site threshold site and the site capacity of 1 dwelling have therefore been discounted, as they cannot therefore be comparable.

Reasonably available

In accordance with national planning policy, in order for development to pass the sequential test it has to be demonstrated that there are no reasonably available alternative sites appropriate for the proposed development located in areas with a lower risk of flooding.

Within The Wyre Council Flood Risk Sequential Test - guidance for applicants document, the council views reasonably available sites as those that are deliverable and developable (as defined by the NPPF Annex 2 Glossary) for the uses proposed and:

1. Lie within the agreed area of search; and
2. Are within the agreed comparator site threshold; and
3. Can accommodate the general requirements of the development; and
4. Are, in principle, in conformity with the objectives and policies of the adopted Local Plan and the objectives and policies of the National Planning Policy Framework and its associated National Planning Practice Guidance (or similar), including those relating to flood risk and relevant aspects of climate change, where they offer more up-to-date guidance.

The council would normally accept that a site is not reasonably available if:

1. It contains an existing operational or business use unless a planning approval for development proposes to extinguish that use; or
2. It has a valid planning permission for development of a similar type and scale which is likely to be implemented.

Evidence that a planning permission is likely to be implemented can include:

1. The discharge of conditions (or the submission of an application to discharge conditions); or
2. Indication from the landowner(s), applicant or developer that a development is being brought forward: or
3. The approval of reserved matters (or an application for reserved matters).

SEQUENTIAL ASSESSMENT

The following sources have been used to identify comparator sites:-

1. The Wyre Strategic Housing Land Availability Assessment (SHLAA)
2. Rightmove online search
3. Enquiries with Professional Property Agents
4. Wyre Council's List of housing sites either allocated in the Local Plan or with extant pp for consideration in sequential tests. Replacement dwellings included. Base date 31.03.22.
5. Wyre Council's Housing Implementation Strategy August 2022
6. Wyre Council's Planning Portal – site approved between 31st March 2022 and 6th September 2023.

1. The Wyre Strategic Housing Land Availability Assessment (SHLAA)

The Wyre Strategic Housing Availability Assessment was updated in 2017. It represents a review of land potentially suitable and available for future residential development. The SHLAA can be used to indicate where residential development could take place (subject to local plan policy and other material considerations) and as a source of information for the conduct of flood risk sequential tests.

The SHLAA 2017 only considers sites of 0.4 hectares or 10 dwellings and above. Therefore, no similar sites were found to match the proposed development. The previous 2010 SHLAA was also considered as this contains information on small sites. However, these smaller sites were only as small as 0.1ha and capable of supporting 3-4 dwellings and therefore much too large and well above the 10% buffer applied in the search criteria.

2. Rightmove on-line search

A search of sites available on Rightmove was undertaken on 11th September 2023. This revealed 7 plots of land for sale within the Wyre Borough:-

Property	Site area in ha.	Reasons for discarding
Raikes Road, Thornton Cleveleys	0.48	Not within comparator site threshold
Sowerby Road, Preston	13.33	Not within comparator site threshold Agricultural land not appropriate for residential development
Long Lane, Scorton	2.70 1.93 1.11	Not within comparator site threshold Agricultural land not appropriate for residential development
Blackpool Road, Poulton FY6 7QA	0.66 and 5.06	Not within comparator site threshold Agricultural land not appropriate for residential development
334 Park Lane, Preesall FY6 0NW		Reserved matters application approved
Bonds Lane, Garstang	0.043	Not within comparator site threshold
Linden Avenue, Thornton Cleveleys	0.050	Not within comparator site threshold

3. Local Agents Search

In addition to Rightmove, a number of local property agents were contacted to enquire about plots of land for sale. Copies of email correspondence with the Agents is attached to this report.

Reeds Rains, Garstang – advised that they had no sites which met the search criteria.

Dewhurst Homes, Garstang – advised they have no land available at present.

Farrell Heyworth, Poulton and Cleveleys – no response to date to emails sent on 7th September 2023. A subsequent search of Farrell Heyworth’s website revealed one housing site in the borough which is already sold, subject to contract:-

Moorland Road, Poulton Le Fylde, FY6

5 Bed 2 Receptions 1 Baths

Planning Application
<https://publicaccess.wyre.gov.uk/online-applications/applicationDetails.do?..>

SSTC
£210,000

Book a viewing Save property

Armistead Barnett, Garstang – no available sites within St Michael’s area. Details are attached of one plot with a bungalow referred to by Armistead Barnett. This site has been discounted as there is no current planning consent for the site.

Entwistle Green – on-line form completed. No response to date. A subsequent search of Entwistle Green’s website revealed one housing site in the borough which is already sold, subject to contract:-

£350,000

Residential (land) for sale
 Hardhorn Close, Singleton, Poulton-Le...

A UNIQUE OPPORTUNITY TO SELF BUILD THE HOME OF YOUR DREAMS ON THIS EXCLUSIVE AND PRESTIGUES DEVELOPMENT, WITH 9 PLOTS RANGING IN SIZE

SOLD STC Land New Homes

12,110 sq ft (1,125.06 sq m)

4. Wyre Council’s List of housing sites either allocated in the Local Plan or with extant pp for consideration in sequential tests. Replacement dwellings included. Base date 31.03.22.

Using the comparator site threshold figures, the following sites within the list are comparable to the application site:

Ref	Site Name	Planning application reference	Total no. dwgs. approved (net)	Flood zone	Site area in ha. (gross)	Reasons for discarding

Small 2948	Rr. 133 West Drive, Cleveleys	19/01219/OUT	1	1	0.05	Application expired on 29.01.23
Small 2875	Adj. Fernbank, School Lane, Forton	21/00970/OUT	1	1	0.05	Spoke to Agent, Chris Harrison. He last spoke to the owner around 12 months ago and at that stage it was her intention to sell with the benefit of planning permission. A search of Rightmove and local agents has not revealed that the land is for sale.
Small 2980	Adj. Applegarth, High Street, Garstang	20/00958/FUL	1	1	0.06	under construction
Small 2889	West of Fell View House, Back Lane, Great Eccleston	18/00800/OUT	1	1	0.06	Reserved matters application approved
Small 2981	Rear of Ivy Cottage, The Square, Great Eccleston	21/01448/FUL	1	1	0.07	Discharge of conditions applications submitted and accepted
Small 2924	Rear of 157A Blackpool Road, Poulton	21/00456/FUL	1	1	0.06	under construction
Small 2950	Adj. 140 Moorland Road, Poulton	19/00094/FUL	1	1	0.07	no pre-commencement conditions discharged consent possibly expired
Small 3014	12 Brocklewood Avenue, Poulton	21/01197/FUL	1	1	0.07	subsequent amended application submitted
Small 2811	North of Oakwood House, Wallace Lane, Forton	20/00386/FUL	1	1	0.06	Spoke to Agent. Applicant's intention is to build and live in the property himself.
Small 2865	Adj. Puddle House, Puddle House Lane, Poulton.	19/00985/REM	1	1	0.06	Discharge of conditions applications submitted and accepted
2663	Throstles Nest, Whinney Brow Lane, Forton	15/00122/FUL	1	1	0.05	Replacement dwelling
2970	White House, Turkey Street, Out Rawcliffe	20/00213/FUL	1	1	0.05	Replacement dwelling

5. Wyre Council's Housing Implementation Strategy August 2022

Housing Implementation Strategy (HIS) sets out the council's position on housing land supply in accordance with the requirements of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG). The HIS takes account of all available information up to and including 31 March 2022 and provides full details on all sources of housing delivery across the Wyre Borough.

Appendix 6 of the HIS lists all sites with planning permission. The following sites were considered comparable after utilising the comparator site threshold figures:-

6. Wyre Council's Planning Portal – site approved between 31st March 2022 and 6th September 2023.

Using the comparator site threshold figures, the following sites have been granted planning permission and are comparable to the application site:

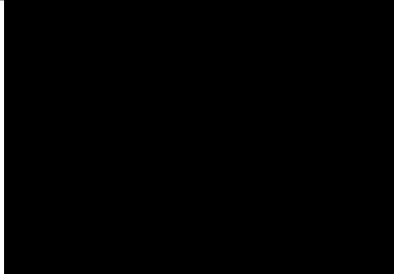
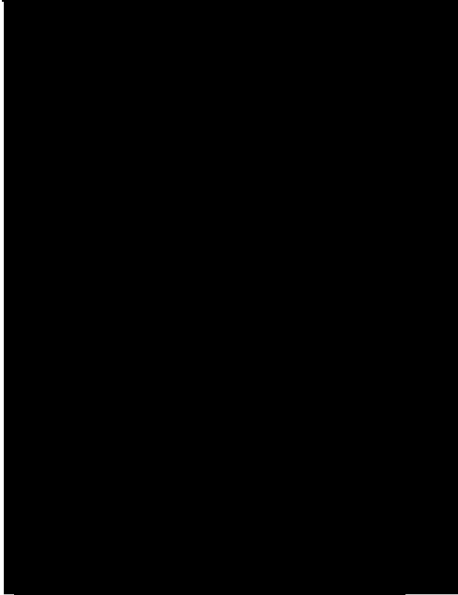
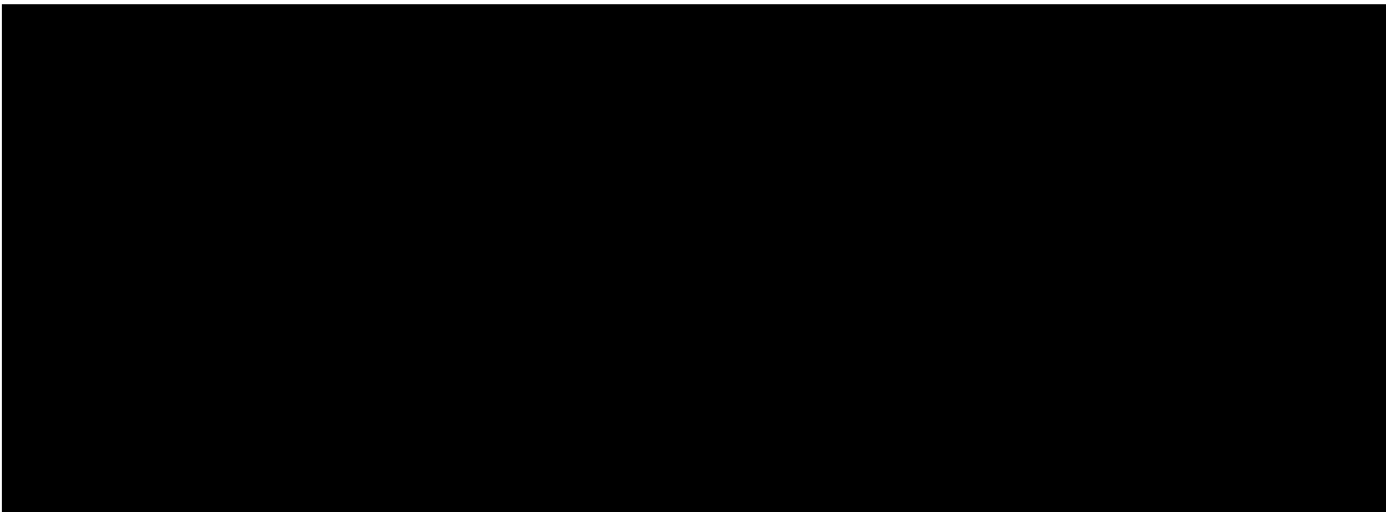
Site Name	Planning application reference	Total no. dwgs.	Flood zone	Site area in ha. (gross)	Reasons for discarding
Inglenook, Ingol Lane, Hambleton	22/00170/OUT	1	1	0.008	Not within comparator site threshold
Land opposite The Old School House, Garstang Road, Barton	22/00247/REM	1	1		reserved matters application Discharge of conditions application submitted and approved
Hill View, Lydiat Lane, Cloughton on Brock	22/00896/FUL	1	1		Replacement dwelling
Poulton Plaiz Holiday Park, Garstang Road	22/00270/FUL	1	1		Replacement dwelling
12 Brocklewood Avenue, Poulton le Fylde	22/00285/FUL	1	1		Discharge of conditions application submitted and approved
63 Hazelhurst Drive, Garstang	23/00217/FUL	1	1	0.0425	Not within comparator site threshold
Land at Gubberford Lane, Scorton	20/00755/FUL	1	1		dwelling associated with larger development and has been constructed
Fairfield Nurseries, Puddle House Lane, Poulton le Fylde	21/01341/FUL	1	1		dwelling to be constructed in association with a larger development
Land south of 83 Garstang Road, Catterall	21/01393/OUT	1	1	0.04	Not within comparator site threshold

Land east of Oak Lodge and north of School Lane, Forton	21/01437/OUT	1	1	0.10	Not within comparator site threshold
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CONCLUSION

The application site is within Flood Zone 2 (medium probability). A sequential assessment has been undertaken in accordance with the NPPF and LPA guidance. Evidence has been provided to demonstrate that there are no other reasonably available sites that could be considered as being more sequentially preferable, suitable or appropriate for the proposal.

On the basis of the above information, we assert that there is no sequentially preferable site to accommodate the proposed development. There is no reason why the application should be refused on these terms.





**Local Independent
Estate & Letting Agents**

GARSTANG. FULWOOD. LONGRIDGE. PENWORTHAM.



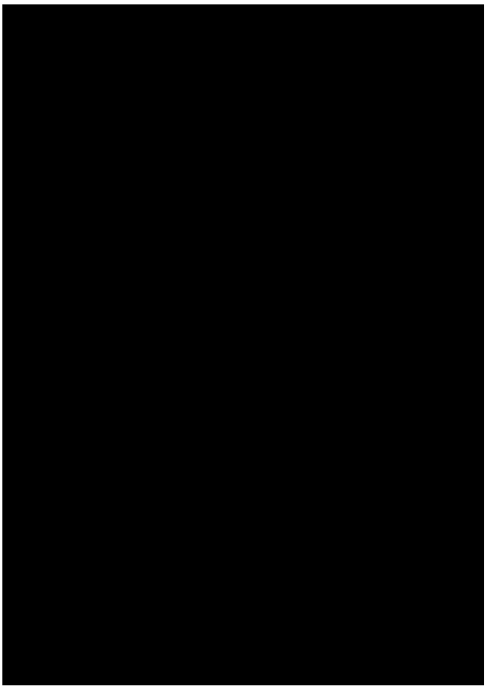
THINKING OF SELLING OR RENTING? BOOK A VALUATION

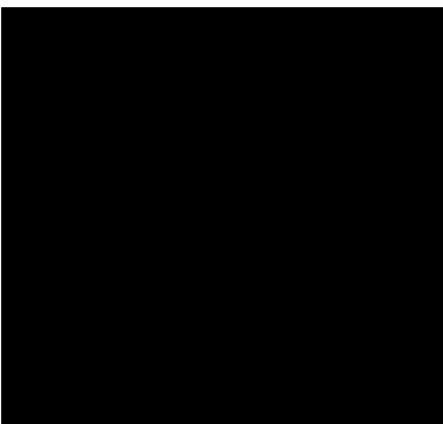
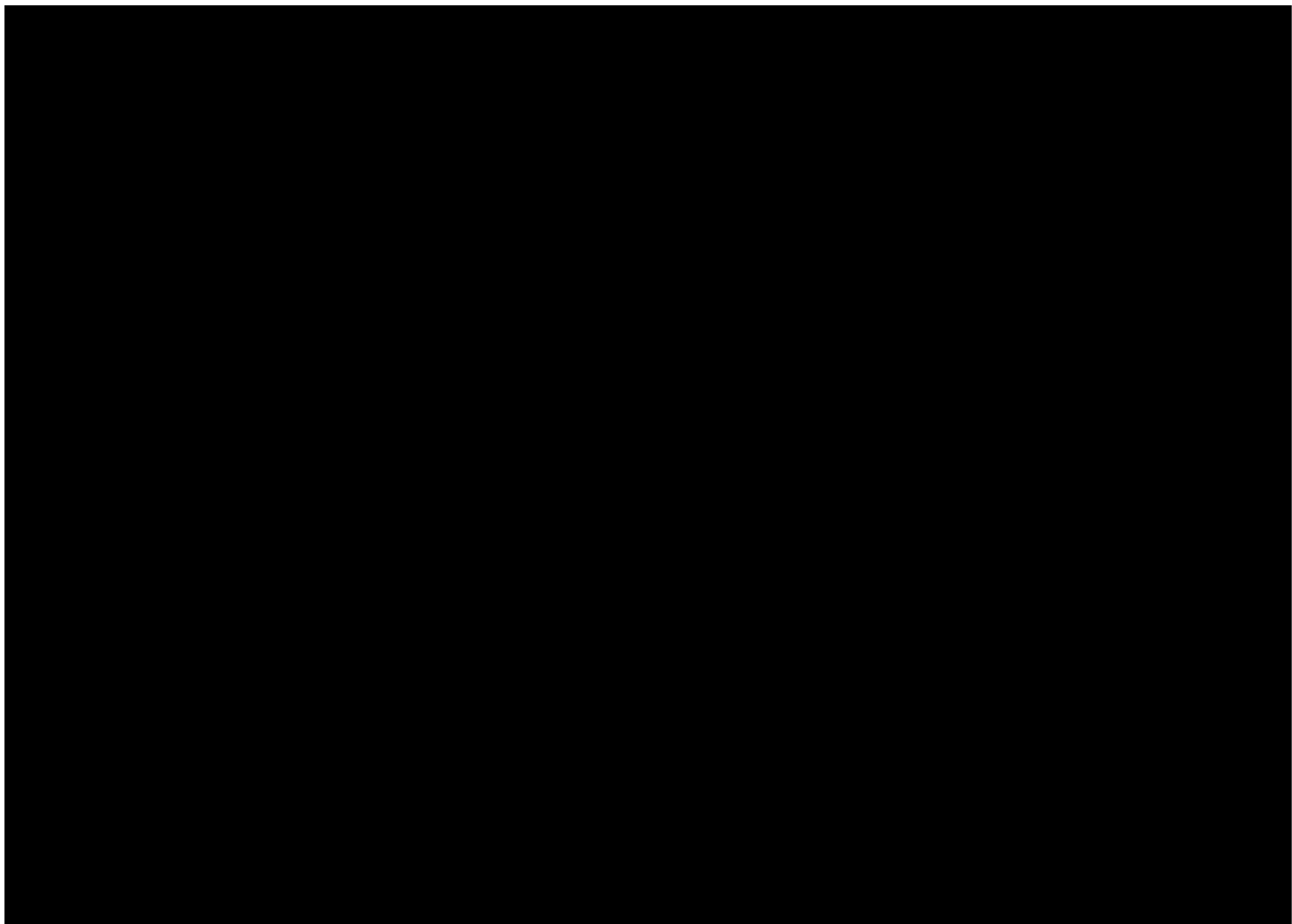


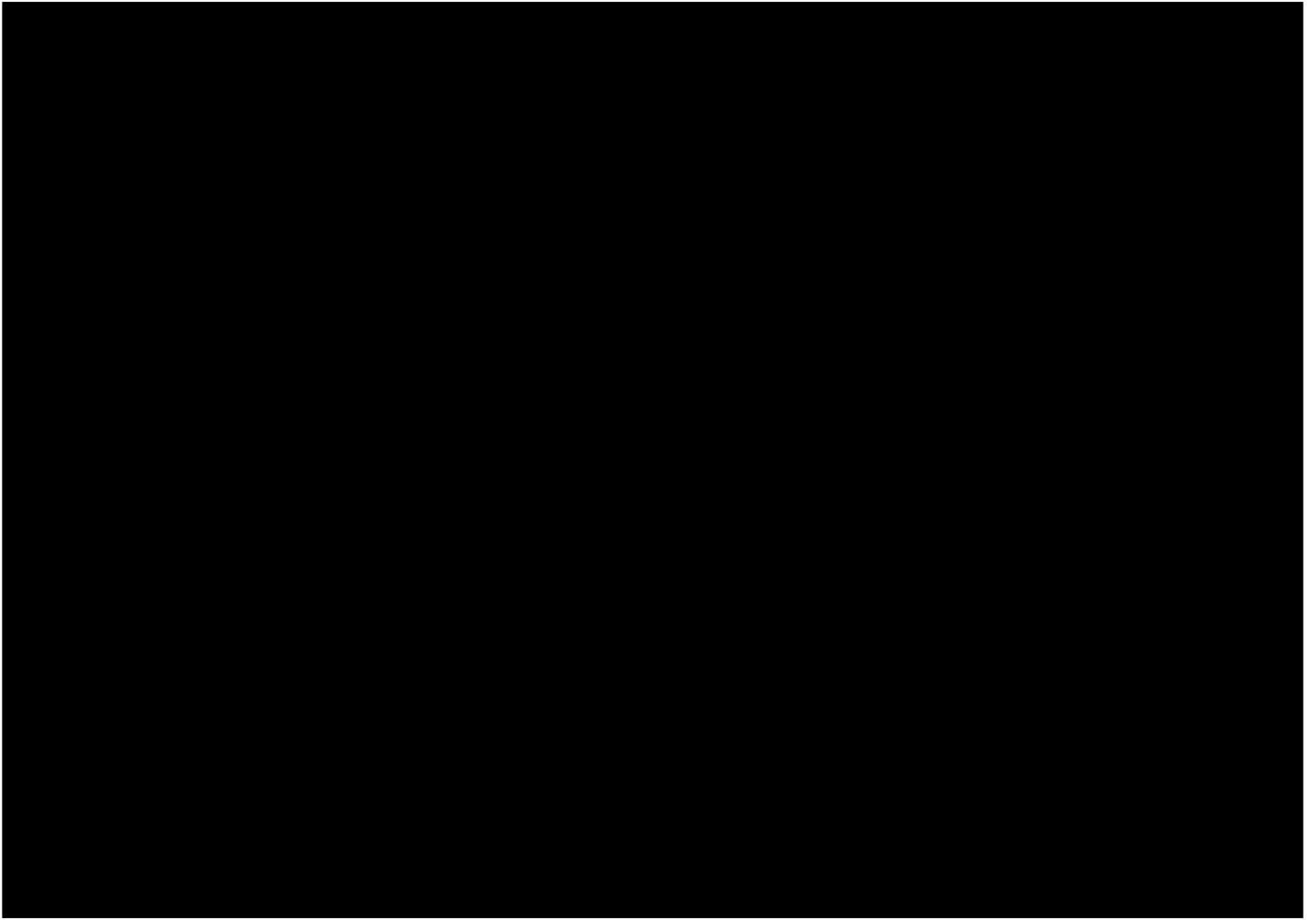
**BRITISH
PROPERTY
AWARDS
2023**

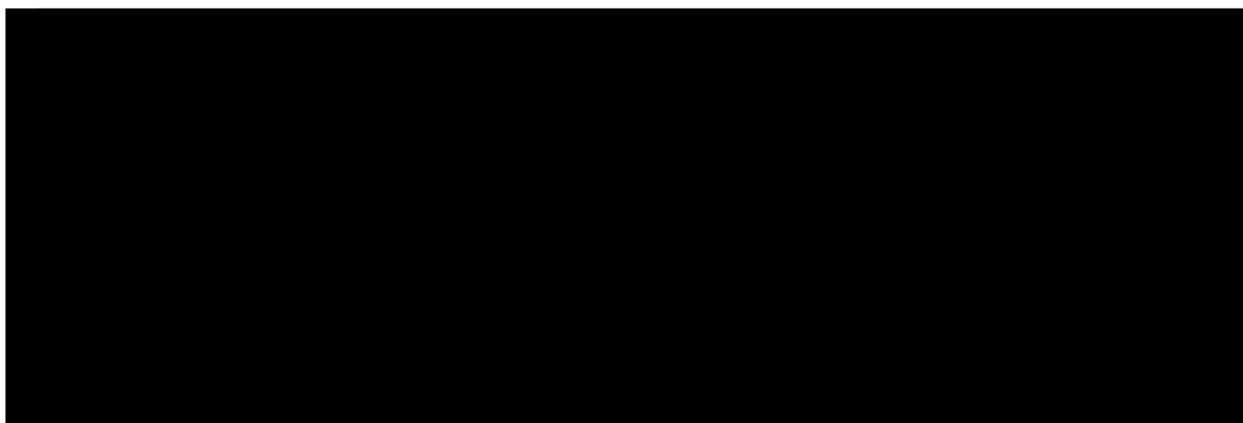
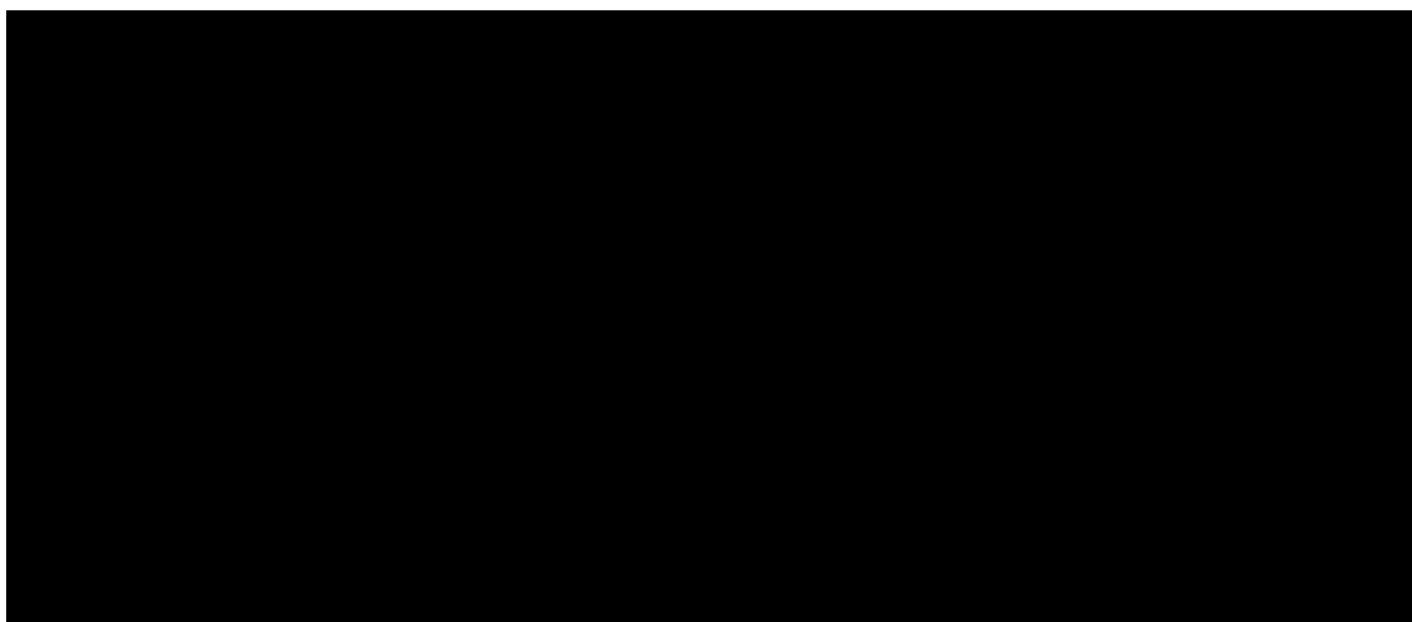
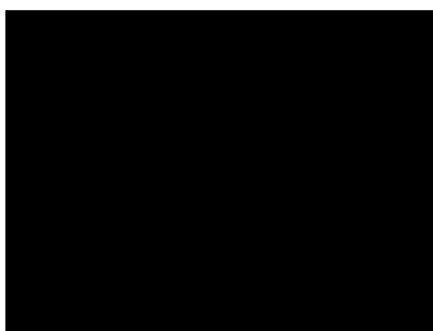
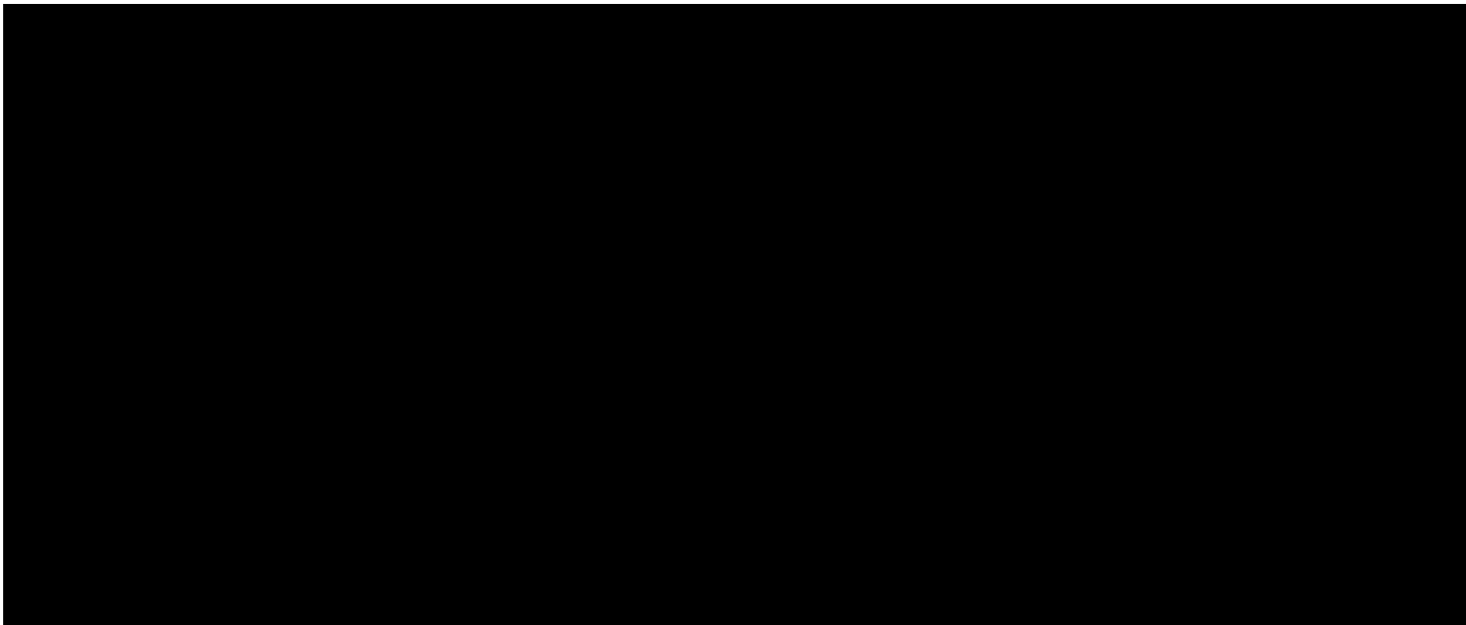
GOLD WINNER

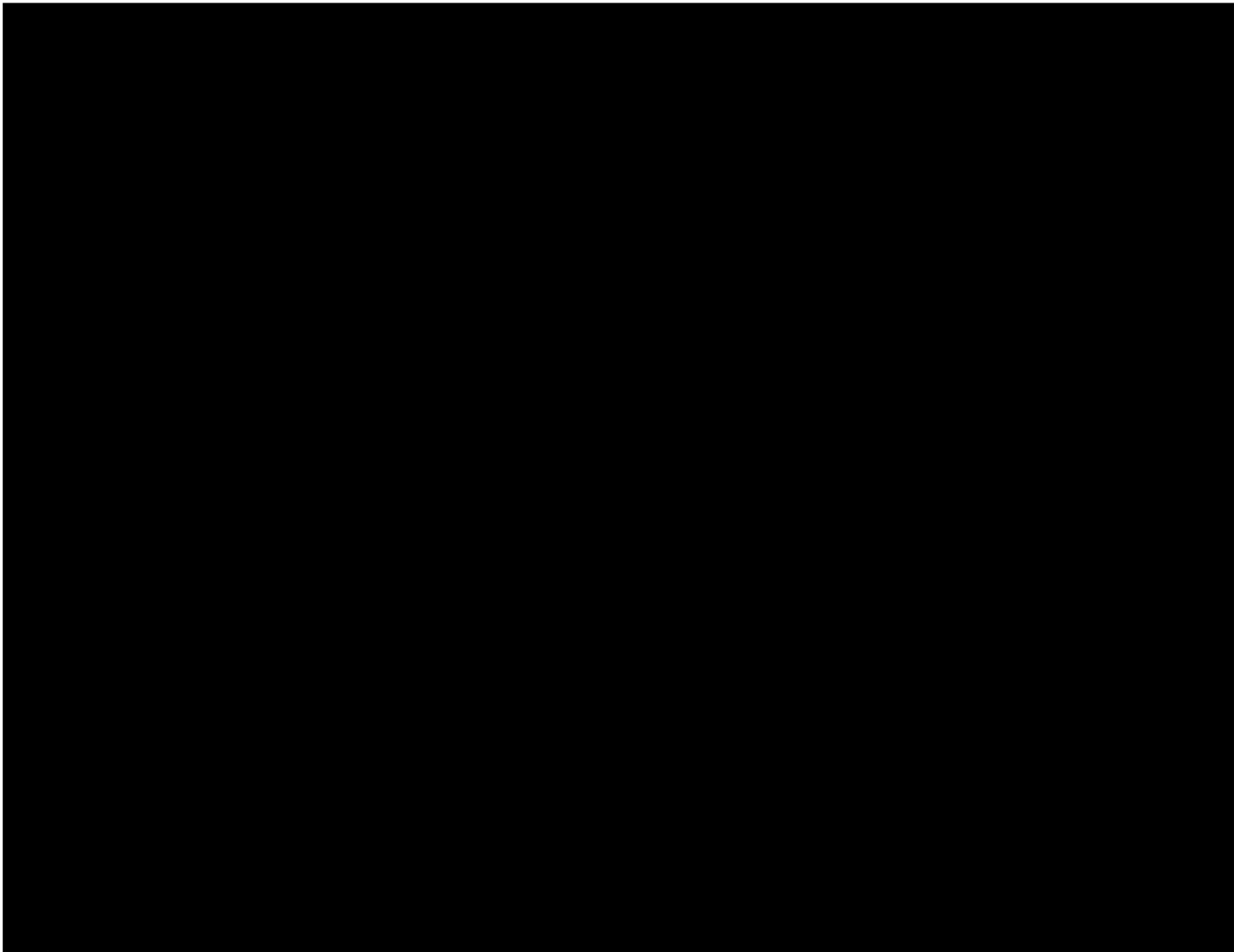
**ESTATE AGENT
IN GARSTANG
& LONGRIDGE**



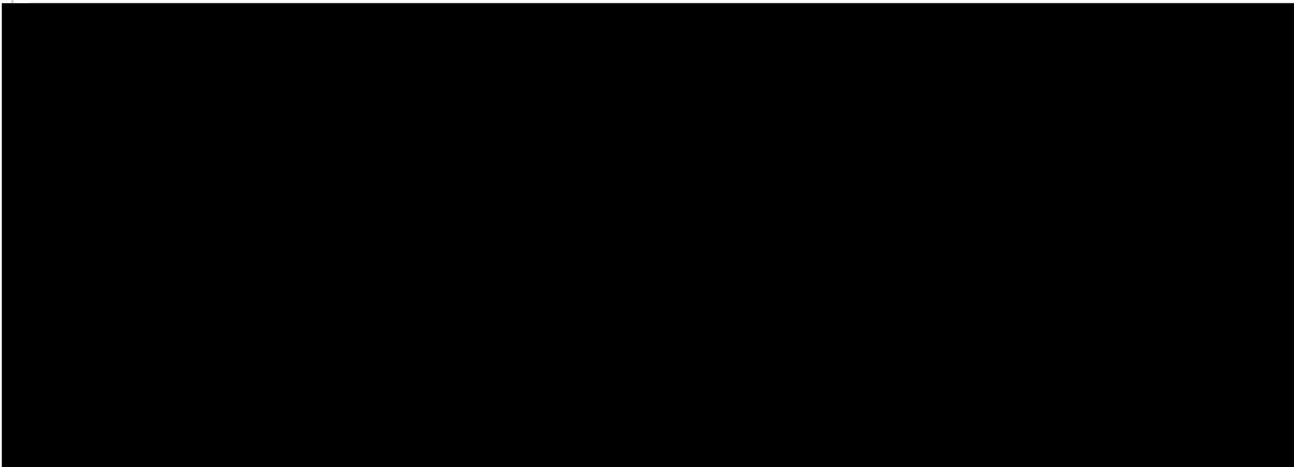
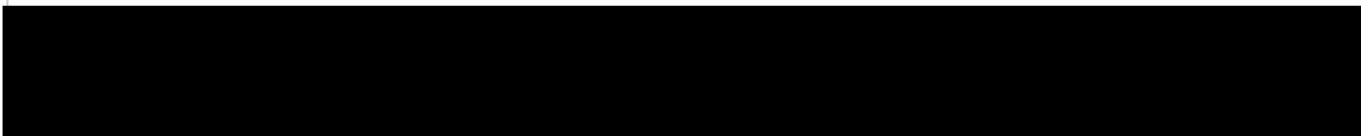








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