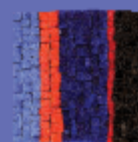


Flood Risk Sequential Test

**Proposal for 53 Affordable Homes
Land off Rosemount Avenue, Preesall**

On Behalf of Breck Homes Ltd

FEBRUARY 2024



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town planning

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Version:	First
Date of Issue:	February 2024

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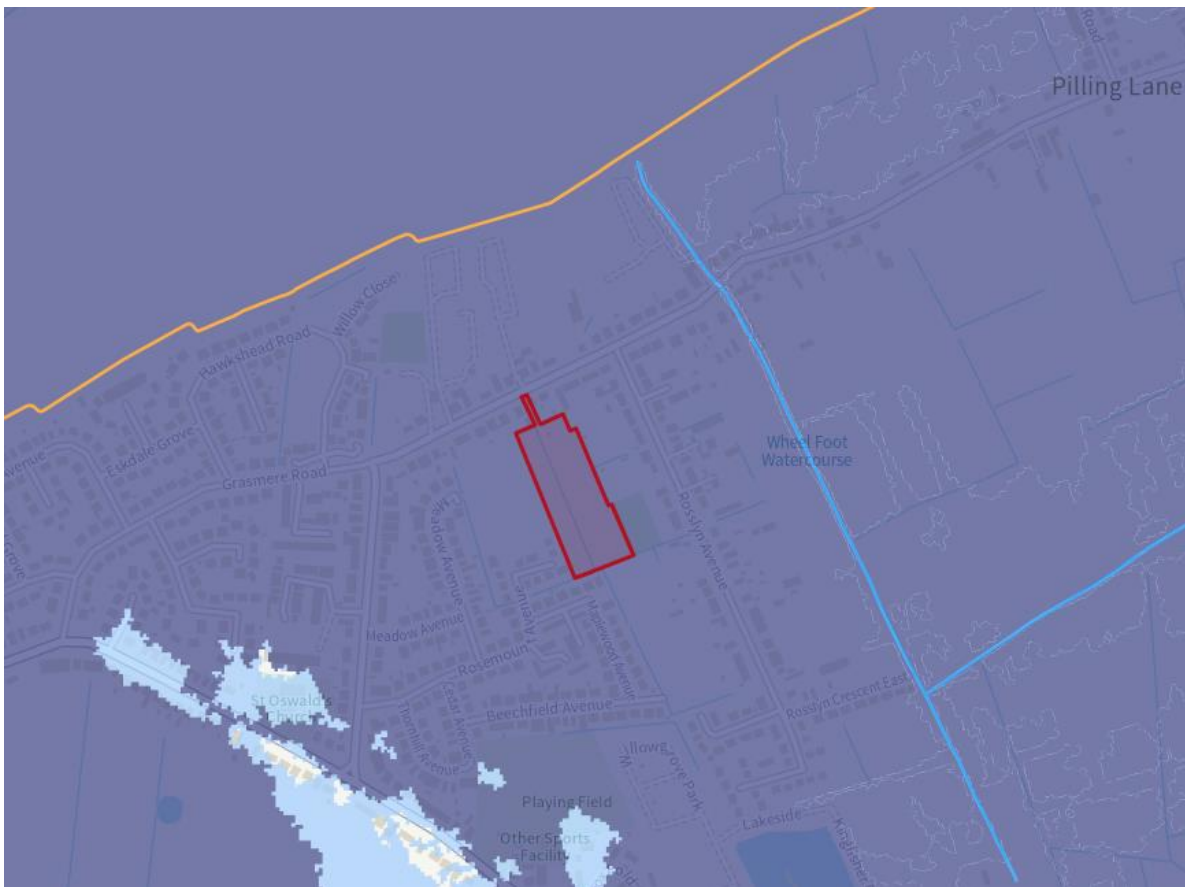
Agent correspondence

1. Introduction

1.1 This Sequential Assessment has been produced on behalf of Breck Homes Ltd. to accompany an application for 53 affordable homes on land off Rosemount Avenue in Preesall. This is required as the site is within Flood Zone 3 in an area benefitting from flood defences. Planning policy requires an assessment of whether any suitable alternative sites at lower risk of flooding are available to accommodate the development.

Existing Site

1.2 This is a 1.53 hectare site which is surrounded by housing and does not appear to have been previously developed. Vehicular access is taken via Rosemount Avenue to the west and Pilling Lane to the north.



1.3 The site borders residential development on all four sides, consisting of the rear of properties fronting Pilling Lane. Land to the south-west was granted planning permission in 2010 for 27 affordable homes (Ref: 09/00937/FULMAJ). Land to the west was granted outline planning permission in 2016 for 44 affordable dwellings (Ref: 16/00010/OUTMAJ) with the subsequent reserved matters application for 42 affordable dwellings approved in 2020 (Ref: 20/00634/REMAJ).

Proposed Development

- 1.4 This application is submitted by Breck Homes on behalf of registered provider Jigsaw Homes Group. The proposals comprise the following:
- A total of 53 affordable dwellings (15 x 2-bed bungalow, 17 x 2 bed semi-detached houses, 11 x 3-bed semi-detached houses, 10 x 4-bed semi-detached houses)
 - Primary access from a continuation of Rosemount Avenue, with an additional pedestrian access from Pilling Lane.
 - Landscaping to the western boundary.
 - A pumping station and electricity sub-station at the north west of the site with adjacent public open space.
- 1.5 The proposed density is 35 dwellings per hectare and the layout is comparable to recent developments immediately to the west and south-west.

2. Sequential and Exception Test Requirements

- 2.1 Paragraph 165 of the National Planning Policy Framework (2023) advises that “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”
- 2.2 According to paragraph 168, “The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. 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. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.”
- 2.3 Paragraph 169 states “If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.
- 2.4 Annex 3 refers to dwelling houses as ‘more vulnerable’. Government guidance contained within ‘Flood risk assessment: the sequential test for applicants’ specifies that more vulnerable uses also require an exception test within Flood Zone 3a.
- 2.5 Paragraph 173 addresses flood risk in the context of a planning application:

“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”

- 2.6 More detailed advice on applying the Sequential Test to individual planning applications is contained in Planning Practice Guidance (ID: 7-033-20140306): “For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with 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...”
- 2.7 The Guidance confirms that “The developer should justify with evidence to the local planning authority what area of search has been used when making the application.” (ID: 7-034-20140306).
- 2.8 In terms of local planning policy, CDMP2 Flood Risk and Surface Water Management of the Wyre Local Plan (2023) states that: “4. Subject to passing the Sequential and, where required, the Exception Test as set out in national policy and guidance, development will only be permitted in flood risk areas where appropriate mitigation and/or adaption measures are proposed to reduce the likelihood and / or impact of flooding.”
- 2.9 Local guidance is also provided to applicants in the Wyre ‘Sequential Test Guidance Note’ (April 2021), which is referred to in the section below.

3. Methodology

- 3.1 It is necessary to establish the development parameters which will be used to identify sites which merit individual assessment and we have sought agreement over these with Wyre Borough Council during the pre-application enquiry process.
- 3.2 The Council's response referred to the Wyre 'Sequential Test Guidance Note' (April 2021), which sets out the range and sources used to identify comparator sites. This includes the requirement to consult three professional property agents to demonstrate there are no reasonably available sites within the borough.
- 3.3 Should this Sequential Assessment be acceptable, then the exceptions test will also need to be passed. The exceptions test part a) requires the proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk. This must be demonstrated in any formally submitted application.
- 3.4 The exceptions test part b) requires development to be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. This will be considered elsewhere within the submission documents.

Development Parameters

- 3.5 Paragraph 7.13 of the Guidance Note states that "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."
- As the site has an area of 1.53 ha, it is necessary to assess sites with an area of 1.38 to 1.68 ha.
 - Given the capacity of 53 dwellings, it is necessary to consider sites suitable for between 48 and 58 dwellings.
- 3.6 This is agreed with the Council and is the single most determinative criteria in the identification of comparator sites.

Location

- 3.7 Paragraph 7.6 of the Guidance Note states that "the council views residential development of all sizes – whether for market or affordable housing - as a strategic matter which will normally be considered on a whole-borough basis".
- 3.8 The site is located within the settlement boundary, and as such it could potentially meet Boroughwide needs. The proposal would not meet the definition of a rural exception scheme which would allow a reduced area of search.

Sources

- 3.9 Paragraph 7.18 of the Guidance Note lists relevant data sources which include the Adopted Local Plan, Employment Land Monitoring Report and the 2017 Strategic Housing Land Availability Assessment (SHLAA). Importantly, the 2023 Housing Monitoring Report has subsequently been published and constitutes the most up to date evidence.
- 3.10 The SHLAA remains a relevant source to identify unallocated sites which do not have planning permission.
- 3.11 In addition to the above, we have also reviewed the Council's website to identify any relevant residential planning permissions which post-date the monitoring report base date of 1st April 2023.
- 3.12 The three agents contacted further to paragraph 3.2 above were:
- Alastair Smith, Butson Blofeld [Butson Blofeld](#)
 - Clare Taylor, Duxburys Commercial [Duxburys Commercial](#)
 - Mike Bowman, [Eden Land and Development](#)
- 3.13 At the time of writing, only Mike Bowman has replied and has advised that he is not aware of any suitable sites. We will continue to pursue feedback during the application determination period. Copies of relevant emails are attached.

Unsuitable Sites

- 3.14 Given the Flood Zone 3a location of the proposal site, any comparator sites with similar flood risk would be excluded from this assessment.

Availability

- 3.15 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.

- 3.16 The Council would normally accept that a site is not reasonably available if it contains an existing operational or business use unless a planning approval for development proposes to extinguish that use, or it has a valid planning permission for development of a similar type and scale which is likely to be implemented.
- 3.17 Where a site is said not to be available on grounds of ownership, the Council will require evidence of this.

4. Sequential Test Findings

- 4.1 The following table shows the first stage of comparator sites. Three of these are from the 2023 Housing Monitoring Report and the remaining sites are from the 2017 SHLAA.
- 4.2 This stage is a filtering exercise which lists **all sites** falling within the +/-10% buffer site area and dwelling capacity suggested within the Council’s Guidance Note.

First Stage Assessment				
Reference	Name	Size (Ha)	Capacity	Comment
Barton				
SHLAA BAR_02	Land North of White Horse Ln.	2.26	54	Open Countryside in an isolated location. Unsuitable.
SHLAA BAR_03	Land South of White Horse Ln.	2.26	54	Open Countryside in an isolated location. Unsuitable.
Bilsborrow				
SHLAA BIL_01	Land bounded by A6 and railway line	2.00	48	Open Countryside. Predominantly FZ3, not sequentially preferable. Unsuitable.
Bowgreave				
SHLAA BOW_08	Land East of Garstang Rd.	2.27	55	Development completed by Rowland Homes circa 2021. Unavailable.
Cabus				
SHLAA CAB_04	Nicky Nook View, Lancaster New Rd.	2.27	55	Located in a Strategic Area of Separation. Unsuitable.
SHLAA CAB_06	North of Snapefoot Ln.	2.25	54	Open Countryside in an isolated location. Unsuitable.
HLM 2204	Acresfield, A6	2.29	53	43 dwellings completed. Unavailable.
Calder Vale				
SHLAA CLD_06	Corner of Strickens Ln/Calder Vale Rd.	2.33	56	AONB, Open Countryside in an isolated location. Unsuitable.

Catterall				
SHLAA CTL_18	Moons Farm, Catterall	2.23	53	Farm in active use. Part of site in Open Countryside. Unavailable and unsuitable.
SHLAA CTL_27	Land South of Stones Ln.	2.00	48	Inaccessible land in Open Countryside location comprising FZ3. Unsuitable.
Cleveleys				
SHLAA CLV_08	Land at Berwick Ave/Croasdale Dr.	1.45	35	Inaccessible Green Infrastructure land. Unsuitable.
SHLAA CLV_09	Dorset Ave Industrial Estate	2.17	52	Industrial units in active use. Existing Employment Area. Removed from first stage of SHLAA. Unsuitable.
Garstang				
SHLAA GST_09	N. of Longmoor Ln. Nateby	2.23	56	Industrial units in active use. Unavailable and unsuitable.
SHLAA GST_53	Conway, west of the A6	2.43	58	Site allocated for Travelling Showpeople. Unsuitable.
SHLAA GST_72	Dunollie Farm, west of St Thomas Primary School, Kepple Lane.	1.44	34	Housing allocation in Local Plan (Ref: SA1/16). RM application approved in 2019 (Ref: 19/00687/REMMAJ). McCarthy Stone built site out in 2022. Unavailable.
Great Eccleston				
Alloc 2691C	South of Pinfold House and West End	1.36	16	Just below site size threshold. Under construction pursuant to 18/00540/FULMAJ and so unavailable.
2903	Willow Grove	1.4	49	Residential caravan park. Unavailable.
Hambleton				
SHLAA HAM_14	East of Carr Ln.	2.02	51	Permission for 51 homes granted in 2016. (Ref: 15/00500/FULMAJ). Storey Homes built site out in 2017. Unavailable.
SHLAA HAM_18	Land at Crooklands Farm	2.40	58	Housing allocation in Local Plan (Ref: SA1/10). RM application approved in 2019 (Ref: 21/01330/RELMAJ). Wain Homes currently constructing site. Unavailable.
SHLAA HAM_27	Land e. of Carr Ln./ n. of Sower Carr	1.40	34	Open countryside site in a remote location. Unsuitable.
Hollins Lane				
SHLAA HLN_04_01	Land South of Cleverley Bank Ln.	2.03	49	Housing allocation in Local Plan (Ref: SA1/13). Permission granted in 2021 (Ref: 20/00505/FULMAJ). Laurus currently constructing site. Unavailable.
Knott End / Preesall				
SHLAA KNO_21	Selbys Pig Farm, Little Tongues Ln.	2.41	58	Open Countryside. Detached from urban area of Knott-End/Preesall. Unsuitable.

Out Rawcliffe				
SHLAA OUT_07	Valliants Equestrian Centre	2.38	57	Open Countryside. Remote from urban area. Unsuitable.
Pilling				
SHLAA PIL_12	Land adjoining Damside Farm	2.15	52	Agricultural land recently taken over for playing fields and village hall. Unsuitable and unavailable.
SHLAA PIL_26	Northern Liner Co. Carr Ln.	2.12	51	Open Countryside. Detached from urban area of Pilling. Unsuitable.
Poulton-le-Fylde				
SHLAA PFY_01_01	Land at Breck Rd. / Station Rd.	0.64	49	Permission granted for extra care apartments in 2014. Completed by McCarthy Stone in 2020. Unavailable.
SHLAA PFY_45	Land off Moorland Rd.	1.95	49	Permission granted for 49 dw. in 2016. Built out by Wain Homes. Unavailable.
HLM 2815A	Tithebarn Street	1.6	46	Being developed by Baxter Homes pursuant to Reserved Matters approval 17/00632/REMMAJ. Unavailable.
Preesall Hill				
SHLAA PRE_10	Land west of Park Ln. Preesall Hill	2.22	53	Open Countryside. Suitable for rural exception subject to local need.
SHLAA PRE_12	Land off Cart Ln. & Green Ln.	2.03	49	Open Countryside. Predominantly FZ3 – High risk of flooding. Unsuitable.
Stalmine				
SHLAA STA_04	North East of Mill Ln.	1.22	9	Permission granted for 9 dw. in 2014 (Ref: 14/00532/OUTMAJ). Completed circa 2020 by Wain Homes. Unavailable.
SHLAA STA_13	Land West of Carr End Ln.	2.27	55	Open Countryside. No footway from settlement. Unsuitable.
SHLAA STA_14	Land North of Douglas Ave.	1.25	30	Open Countryside. Ransom strip on Douglas Ave. Unsuitable.
St Michaels				
SHLAA STM_07	Land at St Michaels Bridge	1.29	31	Open Countryside. Predominantly FZ3 – High risk of flooding. Unsuitable.
Thornton				
SHLAA THN_11	Land at Illawalla, Skippool Rd.	2.10	50	Green Belt. Unsustainable location. Unsuitable.
SHLAA THN_14	Land off Bentley Green	1.39	33	Open Countryside. Predominantly FZ3 – High risk of flooding. Unsuitable.
SHLAA THN_25	Rugby Club, Fleet- wood Rd. North	1.25	30	Green Infrastructure. Football pitches. Unsuitable.
SHLAA THN_45	Land west of Thornton Hall Fm.	1.26	30	Open Countryside & Green Infrastructure. Unsuitable.
SHLAA THN_49	Land at Skippool Rd.	1.18	28	Adjacent to Thornton but in Green Belt. Unsuitable.
Winmarleigh				
SHLAA WIN_01	Adj. Gardeners Cottage	1.21	29	Open Countryside. Significant TPO covers site. Unsuitable.

Second Stage Assessment

- 4.3 Appendix 1 of the Wyre Council Flood Risk Sequential Test Guidance for Applicants confirms that sites identified in the SHLAA which were considered as suitable and available previously may no longer be considered as such. This includes sites which were designated in the Wyre Local Plan (2023) as:
- Open Countryside
 - Strategic Area of Separation
 - Green Infrastructure
- 4.4 Consequently, these sites and those in the Green Belt has allowed us to remove the majority falling within the 10% +/- buffer for dwelling yield and site area. Additionally, many of the sites identified from the SHLAA, Local Plan and Housing Land Monitor 2023 have been developed for housing or are under construction.
- 4.5 There are no sites which have qualified for a second stage assessment, as there are compelling reasons to filter out all of the sites.

5. Conclusion

- 5.1 The proposed development is intended to provide 53 affordable homes on a site of 1.53 hectares. As the site is located within Flood Zone 3, a Sequential Test is required to demonstrate that there are no sequentially preferable sites which are suitable and available to accommodate the proposed development.
- 5.2 This Assessment has identified 40 sites within the 10% +/- dwelling yield and site area range within the Borough of Wyre, in accordance with the Council's guidance for Sequential Assessments.
- 5.3 None of these sites were considered worthy of further consideration as part of a second stage assessment. The majority of the stage one assessment sites were discounted due to their local plan policy designation which would mark them as fundamentally unsuitable.
- 5.4 This Assessment has therefore demonstrated that there are no suitable and available sites appropriate to accommodate the proposed development within the Borough which would be at a lower risk of flooding. There is consequently no reason to refuse planning permission for this reason, subject to the application submission demonstrating that the Exception Test is also satisfied.



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Appendix

Agent Correspondence

Paul Williams

From: Paul Williams
Sent: 24 January 2024 16:30
To: alastairsmith@butsonblofeld.co.uk
Cc: Andy Garnett
Subject: Breck Homes: Residential Sites Sought in Wyre

Dear Alastair,

Our client Breck Homes www.breck.co.uk is seeking residential development sites within Wyre local authority area within the following size parameters:

- Between 1.4 and 1.7 Ha
- Or otherwise capable of accommodating approximately 48 to 58 dwellings

Whilst these specific size parameters arise from a site selection exercise required in connection with a planning application, as a locally-based company Breck Homes are very active in this area and would be interested to hear of any other residential opportunities.

I would be grateful for an early response.

With thanks,
Paul

Paul Williams

Director MRTPI



m: [07825 614919](tel:07825614919)
e: paul@mosaictownplanning.co.uk

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Paul Williams

From: Paul Williams
Sent: 24 January 2024 16:38
To: claretaylor@durburyscommercial.co.uk
Cc: Andy Garnett
Subject: Breck Homes: Residential Sites Sought in Wyre

Dear Clare,

Our client Breck Homes www.breck.co.uk is seeking residential development sites within Wyre local authority area within the following size parameters:

- Between 1.4 and 1.7 Ha
- Or otherwise capable of accommodating approximately 48 to 58 dwellings

Whilst these specific size parameters arise from a site selection exercise required in connection with a planning application, as a locally-based company Breck Homes are very active in this area and would be interested to hear of any other residential opportunities.

I would be grateful for an early response.

With thanks,
Paul

Paul Williams

Director MRTPI



m: [07825 614919](tel:07825614919)
e: paul@mosaictownplanning.co.uk

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Registered in England No. 06018747 at Bloc

Paul Williams

From: mike <mike@edenlandanddevelopment.com>
Sent: 24 January 2024 16:41
To: Paul Williams
Cc: Andy Garnett
Subject: Re: Breck Homes: Residential Sites Sought in Wyre

Dear Paul,

I write further to your recent email regarding your Sequential Test submission to Wyre Borough Council. I can confirm our Company is not aware of any other new build sites which fulfil your criteria, being between 1.4 and 1.7 ha in size with a density capacity of between 48 to 58 dwellings, which are likely to come to the market in the near future within Wyre Borough.

I also confirm Breck Homes are on our mailing list for any future sites which we market throughout the North West.

Kind Regards

Michael Bowman
Director
T 0844 357 3390
M 07599 428 534
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From: Paul Williams <paul@mosaictownplanning.co.uk>
Date: Wednesday, 24 January 2024 at 16:25
To: mike <mike@edenlandanddevelopment.com>
Cc: Andy Garnett <AG@breck.co.uk>
Subject: Breck Homes: Residential Sites Sought in Wyre

Dear Mike,

Our client Breck Homes www.breck.co.uk is seeking residential development sites within Wyre local authority area within the following size parameters:

- Between 1.4 and 1.7 Ha
- Or otherwise capable of accommodating approximately 48 to 58 dwellings

Whilst these specific size parameters arise from a site selection exercise required in connection with a planning application, as a locally-based company Breck Homes are very active in this area and would be interested to hear of any other residential opportunities.

I would be grateful for an early response.

With thanks,
Paul

Paul Williams

Director MRTPI



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e: paul@mosaictownplanning.co.uk

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