



Planning & Development Ltd

JMS Planning & Development Ltd

FLOODING SEQUENTIAL TEST REPORT

IN SUPPORT OF AN APPLICATION BY

MOTOR FUEL LIMITED

IN RESPECT OF A PROPOSED GREGGS BAKERY/CAFÉ WITH

ADDITIONAL HGV PARKING AND ASSOCIATED WORKS

AT

MAIN ROAD SERVICE STATION

WISBECH ROAD

LONG SUTTON

LINCOLNSHIRE

PE12 9AG

Document: Flooding Sequential Test Report

Client: Motor Fuel Limited

Date: March 2019

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CONTENTS

SECTION 1:	INTRODUCTION	1
SECTION 2:	SITE AND SURROUNDING AREA	3
SECTION 3:	THE APPLICATION PROPOSAL	5
SECTION 4:	PLANNING POLICY FRAMEWORK	6
SECTION 5:	THE SEQUENTIAL TEST FOR FLOODING	11
SECTION 6:	CONCLUSIONS	14

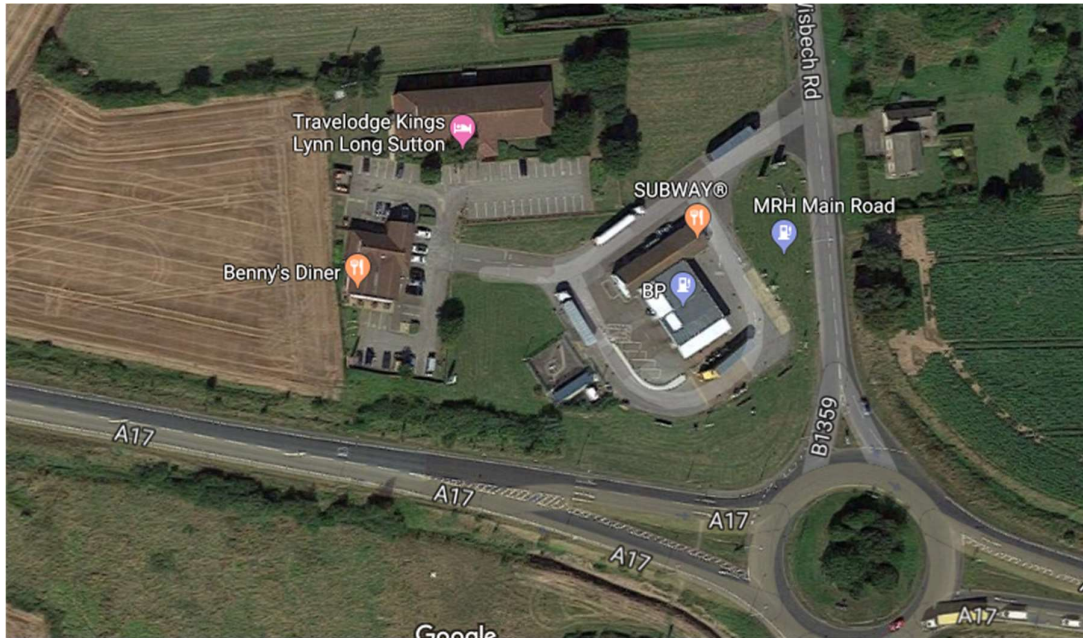
SECTION 1: INTRODUCTION

- 1.1 This Sequential Test Flooding Report has been prepared on behalf of Motor Fuel Limited and is submitted in support of an application for full planning permission for demolition/removal of existing structures (underground LPG tank) and the erection of a coffee shop with drive-thru with associated car parking, cycle parking and landscaping at Main Road Service Station, Wisbech Road, Long Sutton, Lincolnshire, PE12 9AG.
- 1.2 The application site is located within Flood Zone 3. Accordingly, there is a requirement by the LPA that a Flood Risk Assessment be undertaken in support of the planning application and this has been prepared by Evans River and Coastal. In addition, this Flooding Sequential Assessment has also been prepared in support of the application. This approach is supported by the NPPF which confirms that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The NPPF confirms that for any decision on new developments a sequential, risk-based approach to the location of the development should be taken to avoid, where possible, flood risk to people and property and managing the individual risk, taking into account the impact of climate change, by applying the Sequential Test and, if necessary, the Exception Test. This is also reflected in the Development Plan (Policy 4). This document sets out the approach to the sequential test in support of the planning application and should be read in conjunction with the submitted Flood Risk Assessment.
- 1.3 It is considered that the proposed application is of significant merit. Namely;
- The application represents new inward investment into the district;
 - The application will provide important new roadside infrastructure for rest and refreshment and additional consumer choice for users of the A17 as part of an existing roadside facility;
 - It will provide additional diversification on site to meet an existing customer demand;
 - The application proposal will create approximately 11 new jobs; and
 - Consideration has been given to the site's location and landscaping on the wider site has been retained and enhanced.

- 1.4 Accordingly, Section 2 of this report sets out a description of the site and surrounding area. Section 3 sets out the details of the application proposal, whilst Section 4 sets out details of the planning policy background. An assessment of the sequential test in respect of flooding is contained at Section 5 with the relevant conclusions set out at Section 6.

SECTION 2: SITE AND SURROUNDING AREA

- 2.1 Main Road Service Station is located on A17, which provides access to Newark-on-Trent to the northwest, via Leasingham/Sleaford, and to King's Lynn in the east. The A17 bypasses Long Sutton and the application proposal at Main Road Service Station is located to the southeast of Long Sutton on the A17 B1359/Wisbech Road roundabout.
- 2.2 The application site is positioned within a wider motorist service area also providing a petrol filling station, diner and Travelodge. The petrol filling station is located immediately to the east of the application site and comprises a four square arrangement forecourt (with eight refuelling points) and a sales building along with HGV refuelling adjacent to the roundabout. In addition customer car parking for the petrol station is also provided on the site including disabled parking. An above ground (AG) tank (diesel tank) with associated structures is located adjacent to the forecourt abutting the roundabout.
- 2.3 To the northwest of the application site is Benny's Diner including associated car parking with a Travelodge motel located to the north, also including associated parking.
- 2.4 The existing petrol station, diner and Travelodge share the access road from Wisbech Road, which skirts behind the existing sales building and provides access to the diner and hotel.
- 2.5 Diagonally opposite the motorists service area is a site known as 'Car Corner' with a MacDonald's restaurant located on the southern side of the A17 opposite Car Corner.
- 2.6 On Wisbech Road to the north are a number of scattered residential properties leading to the main village of Long Sutton. Long Sutton is provided with a number of facilities including a selection of convenience outlets and restaurants/cafés.
- 2.7 The application site is currently grassed and broadly level and includes an underground LPG tank on the eastern corner adjacent to the diesel tank.



Photograph 1: Aerial View of Main Road Service Station



Photograph 2: Main Road Service Station as viewed from the A17



Photograph 3: Application Site viewed from Access Road to the Travelodge and Diner

SECTION 3: THE APPLICATION PROPOSAL

- 3.1 The application proposes the development of a new coffee shop (Use Class A1/A3) including drive-thru facility with associated car parking, cycle parking and landscaping at Main Road Service Station. The proposed coffee shop building will extend to 139 sqm (gross external area). Twelve customer parking spaces are provided including one disabled space plus one motorcycle bay. Five bicycle racks are also provided upon the site. A drive-thru lane wraps around the rear of the building and includes a waiting bay for large orders adjacent to the delivery bay.
- 3.2 The site's inclusion within Flood Zone 3 is acknowledged and the application is submitted with support from a Flood Risk Assessment and Flood Sequential Assessment.
- 3.3 The proposal utilises the existing access points from Wisbech Road into the petrol filling station and roadside facilities site with access and egress into the drive-thru site from the road leading to the Travelodge and Benny's Diner. Pedestrian routes within the site are clearly defined.
- 3.4 The coffee shop building is modern in design and includes a glazed front elevation, providing a light and spacious seating area. Internally, there will be washroom facilities, including changing and disabled facilities, a servery and the required back of house space. The fabric of the building includes cladding panels and various feature elements including distinctive signage blade.
- 3.5 The coffee shop is provided to be a 'drive-thru' operation to allow visitors to the site to pick up a coffee or pastry etc on the go. In addition, the unit will include an indoor seating area for customers who wish to stay and enjoy their coffee. As a consequence of the indoor tables the proposal incorporates an A3 element.
- 3.6 A typical outlet will provide for 18 full/part time jobs with flexible shifts. It is typically the equivalent of 11 full time jobs. It is proposed that the coffee shop will open 24 hours a day, seven days a week.

SECTION 4: PLANNING POLICY FRAMEWORK

- 4.1 This section of the supporting statement sets out relevant national and local planning policy relevant to the planning application.

National Planning Policy Framework (February 2019)

- 4.2 The revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and reissued in February 2019 with minor updates. This document constitutes guidance for Local Planning Authorities and decision takers. It is a material consideration in the determination of planning applications (paragraph 2).
- 4.3 Planning and flood risk is contained within the NPPF at paragraphs 155-165. It is confirmed 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) (paragraph 155).
- 4.4 All plans should apply a sequential based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and properties. They should do this, and managing the individual risk by:
- (a) Applying the sequential test and then, if necessary, the exception test as set out below;
 - (b) Safeguarding land from development that is required, or likely to be required, for current or future flood management;
 - (c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and

- (d) Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations (paragraph 157).

4.5 The purpose of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a low risk of flooding (paragraph 158).

4.6 If it is not possible for development to be located in zones 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 National Planning Guidance. 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 (paragraph 158).

4.7 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 appropriate flood resistant and resilient;
- (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.

- 4.8 It is confirmed that applications for some minor development (involving householder development, small non-residential extensions (with a footprint of less than 250 sqm)) and changes of use should not be subject to the sequential or exception tests, but should still meet the requires for Site-Specific Flood Risk Assessments (paragraph 164).

National Planning Policy Guidance

- 4.9 The relevant National Planning Policy Guidance Section for Flood Risk and Coastal Change was published on 6 March 2014.
- 4.10 The NPPG confirms that the sequential test ensures that a sequential approach is followed to steer new development to the areas with the lowest probability of flooding. The Flood Zones, as defined in the Strategic Flood Risk Assessment for the area provides 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. The National Planning Guidance confirms that the sequential test does not need to be applied for individual developments on sites which have been allocated in the Development Plan through the sequential test or for applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site). Nor should it be normally be necessary to apply the sequential test to development proposals in Flood Zone 1.

- 4.11 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. 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 planning policies, such as the need for affordable housing within a town centre, or a specific area identified for regeneration.
- 4.12 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.
- 4.13 The exception test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Essentially, the two parts of the test require proposed development to show that they provide wider sustainability benefits to the community that outweigh flood risk and that it will be safe for its lifetime without increasing flood risk elsewhere, and where possible reduce flood risk overall.
- 4.14 In terms of the Flood Risk Vulnerability Classification, lorry parks are not specifically mentioned, but given the nature of the development and the inclusion of a Greggs bakery in the proposal, it is considered appropriate for it to be located within the less vulnerable category.
- 4.15 It is for Local Planning Authorities, taking advice from the Environment Agency, as appropriate, to consider the extent to which the sequential test considerations have been satisfied, taking into account the particular circumstances in any given case.

Development Plan

- 4.16 To the extent the Development Plan policies are material to an application for planning permission, a decision must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 4.17 The Development Plan relevant to the application site comprises of the South East Lincolnshire Local Plan 2011 – 2036 which was adopted on 8 March 2019. This document was prepared in partnership with Boston Borough Council, South Holland District Council and Lincolnshire County Council to create a single Local Plan for the area of South Holland and Boston Borough.
- 4.18 In acknowledging that much of the land within the Local Plan area is at significant risk of flooding, Policy 4 sets out the approach to flood risk. Development proposals in an area at risk of flooding (Flood Zones 2 and 3 of the Environment Agency's Flood Map) or at risk during a breach or overtopping scenario will be permitted where:
- (i) It can be demonstrated that there are no other sites available at a lower risk of flooding, ie that the Sequential Test is passed;
 - (ii) It can be demonstrated that essential infrastructure in flood risk zones provides wider sustainability benefits to the community that outweigh the flood risk;
 - (iii) The application is supported with a site specific Flood Risk Assessment covering risks from all sources of flooding including the impact of climate change and addressing a number of listed criteria.

SECTION 5: THE SEQUENTIAL TEST FOR FLOODING

- 5.1 As set out previously in this report the Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The Flood Zones are identified within the Strategic Flood Risk Assessment for the area which provides the base for the Exception Test as well as, predominantly, the catchment area of the proposal.
- 5.2 As identified within the NPPF, the aim is to steer new development to Flood Zone 1 (area 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 which 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.

The Catchment Area

- 5.3 There is a need for enhanced roadside facilities at Main Road Service Station to complement the existing established facilities on site and in the immediate vicinity.
- 5.4 With regard to the proposed catchment area, there is only a very limited area which would be suitable for the proposal, as it needs to be on the A17 adjacent to other motorist facilities. It should also ideally be at a junction or roundabout to ensure vehicles are travelling at low speeds which would allow them to easily enter the site.
- 5.5 Accordingly, the only logical area for the enhanced facility associated with the petrol filling station is on the A17 and upon the proposed site. However, in the interests of assessing if any other sites are sequentially preferable in flood risk, the A17, extending to Kings Lynn to the east and A16 to the west, has been considered as the catchment area.

- 5.6 In assessing the suitability of any sites on the A17, the following characteristics of any site are required:
- The site needs to be of approximately 1.0 hectares in order to accommodate the development in its entirety ie petrol station and coffee shop drive-thru;
 - The site needs to have an appropriate level of prominence and sufficient visibility in order to allow drivers to safely access the site from the public highway;
 - The site needs to have appropriate visibility splays to allow safe ingress and egress; and
 - The site needs to be away from residential properties in order to allow an unfettered operation.
- 5.7 In respect to the above, ie the A17, and the defined catchment falls almost entirely within Flood Zone 3 with the area to the east benefitting from flood defences. This is unsurprising given the character of the area. This is acknowledged in the Development Plan and in Policy 4. As such, an '*on the ground*' review of the land along the A17 outside Flood Zone 3 has been undertaken.
- 5.8 There is a small area of land to the south of the site covering the adjacent roundabout which is in Flood Zone 2, but this is not suitable as it is required for the roundabout. There is a similar small parcel of land to the west where the A17 crosses the B1390, but again this is not suitable due to the roundabout requiring the land. Beyond this there are odd patches of Flood Zone 2 areas but these are small in nature and within the open countryside so would not be suitable for the proposal.
- 5.9 Having undertaken the assessment, no suitable sites have been found within a reasonable distance of the site on the A17, falling outside Flood Zone 3, ie within Flood Zone 1 or 2. As such, having reviewed sites within the proposed catchment area of the application based on the above criteria, no suitable or available sites in a sequentially preferable location have been found.
- 5.10 It is not considered that the exception test is required to be demonstrated here. However, it is considered that the benefit of the proposal in supporting the motorists of the A17 is a relevant consideration.

5.11 As such, the application can be considered to have wider economic benefits that outweigh any concerns over flooding. In addition, on the basis that no residential floorspace is proposed, it is considered that the application proposal is a less vulnerable use and therefore there should be no concerns regarding the proposal in this location within Flood Zone 3 especially with an appropriate building design and flood evacuation strategy in place (notwithstanding that no sequentially preferable locations exist).

SECTION 6: CONCLUSIONS

- 6.1 This Sequential Test Flooding Report has been prepared on behalf of Motor Fuel Limited and is submitted in support of an application for full planning permission for demolition/removal of existing structures (LPG underground tank) and the erection of a coffee shop with drive-thru with associated car parking, cycle parking, landscaping and associated works at Main Road Service Station, Wisbech Road, Long Sutton, Lincolnshire, PE12 9AG.

- 6.2 Based on the catchment area of the proposal, an assessment of sequentially preferable sites in flooding terms has been undertaken of the A17 within the catchment area of the application proposal. Based on the application site's required criteria, no sites have been identified which are within a sequentially preferable flooding location. On this basis, it is considered that the application proposal meets the Sequential Test for Flooding, as identified above.