Flood Risk Assessment

Petrol Station, WM Morrison Supermarket, Needingworth Road, St Ives, PE27 4NB

Introduction

This note has been prepared in support of a full planning application for the removal of an existing jet wash and the erection of 2no. jet wash bays, plant room, 1no. air/water and vacuum unit and associated works.

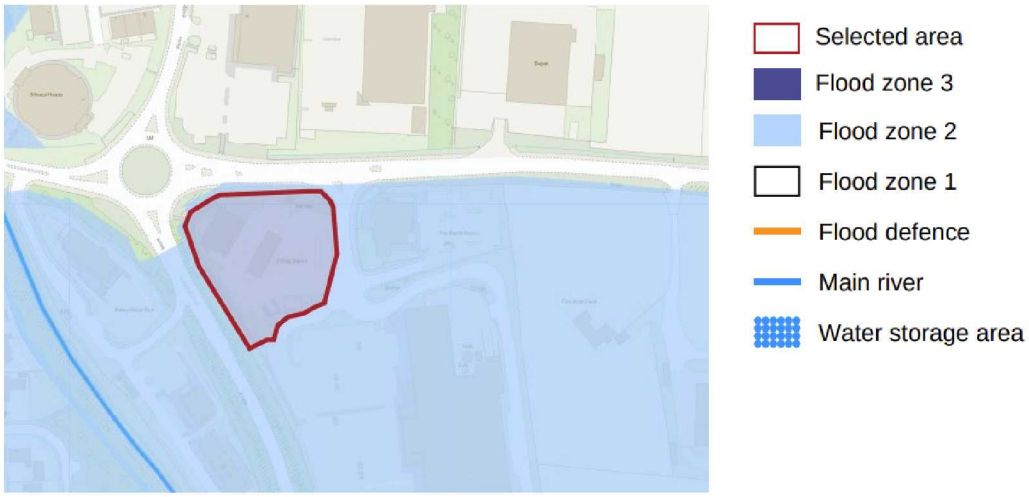
The application proposes the following:

- 2 no. jet wash bays, 1 covered and 1 uncovered;
- Plant room; and
- Air/water and vacuum unit.

The proposed alterations do not propose new buildings, increase the footprint of existing buildings or the amount of internal accommodation and do not result in an increase in impermeable area at the site.

Site Location

The site is bounded by the A1123 to the north and Harrison Way to the west. The application site comprises an existing petrol filling station site. The site is mainly covered with concrete across its entirety and there is an existing jet wash that is to be removed. The site is located within flood zone 2 (see image below).



Flood Policy/Guidance Overview

The national planning policy framework states in paragraph 165 that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Paragraph 169 notes that 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. Paragraph 169 notes that to pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Paragraph 173 notes that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Paragraph 174 notes that applications for some minor development (defined as including small non-residential extensions with a footprint of less than 250m^2) should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 60.

Application of the sequential test seeks to ensure development is located in areas at no / lower risk of flooding, where possible. The NPPG notes that minor developments are unlikely to raise significant flood risk issues unless:

- they would have an adverse effect on a watercourse, floodplain or its flood defences;
- they would impede access to flood defence and management facilities, or;
- where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows. (Paragraph: 051 Reference ID: 7-051-20220825)

Furthermore, the NPPG notes that 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. (Paragraph: 027 Reference ID: 7-027-20220825). This advice is clearly relevant to the proposed development as the provision of jet washes is an entirely appropriate form of development at an existing petrol filling station.

Table 2 notes that less vulnerable development is acceptable within zone 2 and zone 3a. The notes to Table 2 confirm that "*the Sequential and Exception Tests do not need to be applied to those developments set out in National Planning Policy Framework footnote 56"* of which is now footnote 60 (NPPF, 2023).

Conclusion

As set out above, the development proposed by this application firmly falls within the definition of minor development. The NPPG notes that such developments are unlikely to raise significant flood issues unless:

- they would have an adverse effect on a watercourse, floodplain or its flood defences;
- they would impede access to flood defence and management facilities, or;
- where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.

The minor nature of the proposals will in no way affect any watercourse or floodplain, impede access to flood defences or contribute to any cumulative effect on flood storage or flows. Furthermore, as an extension to an existing customer car parking space 'offer', it is impractical to suggest that such facilities can be provided elsewhere.

The provision of jet wash bays will provide benefit to the community.

The planning application proposes no new floorspace / development, merely some fairly minor ancillary structures to provide for jet washes. The proposed alterations do not alter the immediate or wider context in terms of planning considerations, do not propose new buildings, increase the footprint of existing buildings or the amount of internal accommodation and do not result in an increase in impermeable area.

Consequently, in accordance with paragraphs of the NPPF and NPPG, the proposal will not increase flood risk issues elsewhere. On this basis, and as it would be classified as less vulnerable development which can be located within zone 2, the proposed application is considered acceptable in flood risk terms.