



Report

GVA
City Point
29 King Street
Leeds
LS1 2HL

Flood Risk Assessment Sequential Test

Old Mill Lane, Barnsley

June 2012



Prepared By: Hannah Gregory/Clare Plant Status: Senior Planners Date: 1st June 2012

Reviewed By: Alistair Andrew Status: Associate Director Date: 11th June 2012

For and on behalf of GVA Ltd

CONTENTS

1.	Introduction	1
2.	The Sequential Test	2
3.	Proposed Site Location and Assessment Criteria	4
4.	Specific Sites Considered	6
5.	Conclusion	14

1. Introduction

- 1.1 GVA Ltd act on behalf of Peel Holdings Ltd with regards to the proposed retail development located on Harborough Hill Park site, Old Mill Lane, Barnsley.
- 1.2 The Sequential Test examines possible alternative locations for the proposed retail development, to accompany the planning application as part of the requirements of NPPF in respect of Flood Risk. This report will demonstrate that there are no other sequentially preferable sites that are available and deliverable, over and above the existing site.
- 1.3 This report is structured as follows:
- The Sequential Test – explaining the nature of the Sequential Test and how it should be applied and when it is applicable to apply the exceptions test;
 - Proposed Site Location and Assessment Criteria – introducing the proposed site location for the retail development and the requirements necessary to test if there are any other sequentially preferable sites available;
 - Specific Sites Considered – specific sites that have been identified as possible redevelopment sites are considered in a matrix against the identified criteria; and
 - Conclusion – setting out the justification for bring the site forward for the proposed retail development in terms of the Sequential Test.

2. The Sequential Test

NPPF

- 2.1 The NPPF (March 2012) largely reiterates previous guidance in PPS25 in that flood risk should be considered at all stages of the planning and development process. Importance is placed upon the management and reduction of risk in land-use planning, acting upon the precautionary process and taking into account climate change.
- 2.2 Within the NPPF, the Government places emphasis on urban regeneration and the redevelopment of previously developed land. In the past significant development took place alongside rivers and within proximity of the coastline, therefore some brownfield land will be vulnerable to flooding. A balanced, flexible approach is needed which addresses the risks of flooding against the benefits of recycling brownfield land and promoting economic development.
- 2.3 The aim of the guidance is to strengthen the co-ordination between land-use and development planning and the operational delivery of flood defence strategies, strengthening the links between land-use planning and land management.
- 2.4 Outlining planning policy in relation to development and flood risk, paragraph 100 of the NPPF sets out that inappropriate development in area of higher flood risk should be avoided. Where development is required in such areas, the development should be safe and not increase flood risk elsewhere. The opportunity should also be taken to reduce the cause and impacts of flooding within the site.
- 2.5 Paragraphs 101-104 of the NPPF detail the application of the sequential approach, stating that LPAs should apply the sequential approach as part of the identification of land for development in areas at risk of flooding. Paragraph 101 states that through application of the 'sequential test':

“Development should not be allocated or permitted if there are reasonably available sites inappropriate for the proposed development in areas of lower probability of flooding”

- 2.6 If following application of the sequential test it is not possible, consistent with sustainability objectives, to locate development in zones with a lower probability of flooding, the exceptions test should be applied, whereby it must be demonstrated that:
- *The development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared; and*
 - *A site-specific FRA has been prepared to demonstrate that the site will be safe for its lifetime, taking account of vulnerable users, and will not increase flood risk elsewhere and where possible will reduce flood risk overall.*
- 2.7 Where relevant, both elements of the test must be passed for development to be permitted.

Strategic Flood Risk Assessment (SFRA)

- 2.8 Paragraph 100 of the NPPF instructs LPAs to appraise risk and carry out a Strategic Flood Risk Assessment (SFRA). This should be done in liaison with the Environment Agency.
- 2.9 The Barnsley Level 1 SFRA was prepared by JBA Consulting and published in September 2010. The study identifies and analyses current and future flooding issues for key locations in the LPA area to support assessment of development site allocations. The SFRA recognises land pressures for development and economic growth but states that due regard must be given to flood risk management. Where new development is necessary in flood risk areas, the policy aims to make it safe without increasing flood risk elsewhere.
- 2.10 The Council identified a number of development sites, which are tested within the SFRA in terms of flood risk. The results of this analysis indicate that the majority of areas where growth will be located within Barnsley are within flood zone 1. The application site at Old Mill Lane is not specifically tested within the SFRA and as it falls within a combination of flood zones 1, 2 and 3, a site-specific FRA is submitted as part of the application.

- 2.11 Alongside the submitted FRA, this document addresses the requirements of the NPPF and Core Strategy in relation to new development in higher risk flood zones through the application of the sequential test. In this respect the technical guidance accompanying the NPPF provides the basis for applying the Sequential Test, in consideration of the vulnerable uses in Table 2. This table confirms that the proposed retail use is a 'less vulnerable' use and the petrol filling station is a 'more vulnerable' use. Table 3 confirms that these uses are acceptable in the respective flood zones and do not require the application of the exceptions test.

3. Proposed Site Location and Assessment Criteria

- 3.1 The proposal is for the redevelopment land at the junction of Old Mill Lane and Twibell Street to create a new food store and community park. The application is made in outline and is accompanied by supporting statements of appropriate detail to illustrate how the site is to be developed.
- 3.2 The outline application identifies a comprehensive approach to the reuse and redevelopment of the site and shows how the site is intended to be accessed. The proposals aim to provide a new food store and community park for the benefit of local residents whilst also improving views at this key gateway into Barnsley Town Centre.
- 3.3 The 6 ha site is located north east of Barnsley Town Centre. The site comprises 3 retail buildings, a gas storage facility and the former council depot (now a cleared site).
- 3.4 The predominant surrounding land use is retail with residential uses and green belt also bordering the site and surrounding area. The site is bound by a small number of residential properties to the south along Twibel Street. Old Mill Lane (A635) runs along the western boundary and junctions with Harborough Hill Road (A61) to the south west of the site. The Peel Centre and Asda make up the majority of retail development surrounding the site.
- 3.5 The site's location, along the corridor of Old Mill Lane (A635), Wakefield Road (A61) and Harborough Hill Road (A61), is on a strategic gateway into Barnsley and has an important role to play in creating positive impressions of the town.
- 3.6 The site is bound to the north by the River Dearne. Part of the site lies within Flood Zone 3.
- 3.7 To inform the Sequential Test, taking into account the proposed use for the site, the Barnsley Core Strategy and the NPPF, the following criteria for locating a redevelopment site have been identified:
- The flood risk to the site;

- The availability of 'reasonably available' (suitable developable and deliverable) sites in the relevant area with a lower flood risk that could be used for the development;
- The vulnerability classification of the development;
- Evidence to show that wider sustainability benefits to the community outweighs the flood risk; and
- That the development is safe and residual flood risk can be overcome to the satisfaction of the Environment Agency and other stakeholders.

4. Specific Sites Considered

- 4.1 In total, 23 sites have been considered in the sequential test. All these sites have been taken from the Unitary Development Plan, Proposals Map, Barnsley Town Centre (2000) and are potential town centre development sites. The sites have been assessed against the criteria, as set out in Section 3, along with relevant planning policy. The results are set out in the Sequential Test Matrix below. The site reference numbers correspond with the UDP proposals map references for Barnsley Town Centre.
- 4.2 The Sequential Test Matrix considers the sites listed above against the criteria identified in Section 3. A ✓ symbol indicates that the site is more appropriate in relation to specific criteria than the proposed redevelopment site. A ✗ symbol indicates that the site is less appropriate in relation to specific criteria than the proposed redevelopment site. A = symbol indicates that the site is equally appropriate in relation to specific criteria as the proposed redevelopment site. In order for a specific site to be more sequentially preferable for this development then all of the symbols relating to a specific site must read ✓ or =.

Sequential Test Matrix:

Site (UDP reference)	Description and Context	Flood Risk Zone	Planning Policy Allocation (Local Plan)	Sustainability (Previously Developed Land, Accessibility, etc.)	Availability and Deliverability
Flood Zone 1					
Yorkshire Electricity Site	Former Yorkshire Electricity depot totals 1.94ha and is located to the north east of the principal shopping area. ✓	Zone 1 ✓	Edge of Centre Site allocated as TC58/20 and located within Policy Area 3 – Transport Interchange ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not Suitable. Access issues exist making it unsuitable for a large food retail store. ✗
Land adjacent to Morrisons	The site totals in excess of 2.10ha and is located to the south of the principal shopping area. ✓	Zone 1 ✓	Edge of Centre Site allocated as TC58/22 and TC58/23. The site falls within Policy Area 5 – Southern Development Area and under TC60/3 both of which identify it as being suitable for Employment Development. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable. The site is in multiple ownerships with part of the site (TC58/22) under construction (on hold) and the remainder subject to a current planning application. ✗
Wholesale Market, Pontefract Road	The site totals 1.2ha in size and is located south east of the principal	Zone 1 ✓	Edge of centre site allocated as TC58/1. The site is located within Policy Area 10 – Oakwell Housing.	The site is accessible by car, bus, cycle and foot and is a brownfield site.	Unavailable – This site has been fully developed for housing.

	shopping area.		=	=	×
Oakwell Land	The site totals 0.4ha and is located south east of the principal shopping area.	Zone 1 ✓	Out of centre site allocated as TC58/2. The site is located within Policy Area 4 – eastern Development Area. =	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable – This site has been fully developed for housing ×
Market Street	The site totals 0.15ha and is located south west of the principal shopping area.	Zone 1 ✓	Town Centre site allocated as TC58/3. The site is located within Policy Area 1 – central shopping, and under TC59 – Area of Comprehensive Retail Refurbishment. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not Suitable - The site is too small for the proposed with inadequate access for major food store development. May also form part of the new Barnsley Markets Masterplan area. ×
Peel Street	Peel Street totals 0.08ha in size and is located within the central shopping area.	Zone 1 ✓	Town Centre site allocated as TC58.4. The site is located within Policy Area 1 – central shopping. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable - The site has been developed and is operating as a nightclub. ×

Nelson Street	The site totals 0.04ha in size and is located within the principal shopping area.	Zone 1 ✓	Town centre site allocated as TC58.5. The site is located within Policy Area 7 – Wellington Street Fringe. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable – the site has been developed. ✗
Royal Street	The site totals 0.06ha and is located within the principle shopping area.	Zone 1 ✓	Town centre site allocated as TC58.5. The site is located within Policy Area 2 – Northern Office/ Education/ Civic Centre. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable – Site is in multiple ownerships and occupied. ✗
Queens Road	Queens Road totals 0.1ha and is located east of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58.7. The site is located within Policy Area 2 – Northern Office/ Education/ Civic Centre, and under Policy TC17 – Conservation area. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable – part of the Barnsley Markets Scheme. ✗
Falcon Street	Falcon Street totals 0.53ha and is located north of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58.8. The site is located within Policy Area 2 – Northern Office/ Education/ Civic Centre. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable – Site is occupied by educational uses (The Core). ✗

Fairfield House	Fairfield House totals 0.6ha in size and is located north of the principal shopping area.	Zone 1 	Edge of centre site allocated as TC58.9. The site is located in Policy Area 2 – Northern Office/ Education/ Civic Centre. 	The site is accessible by car, bus, cycle and foot and is a brownfield site. 	Not Suitable – the site is too small with inadequate access. Large scale foodstore development is unlikely to be appropriate within the Conservation Area. 
Old Mill Lane	Old Mill Lane totals 1.9ha in size and is located north of the principal shopping area.	Zone 1 	Out of centre site allocated as TC58.10. The site is located in Policy Area 2 – Northern Office/ Education/ Civic Centre. 	The site is accessible by car, bus, cycle and foot and is a brownfield site. 	Not Suitable –The site has poor access and is not sequentially preferable in retail terms in accordance with NPPF. 
Westgate	Westgate totals 0.08ha in size and is located north of the principal shopping area.	Zone 1 	Edge of centre site allocated as TC58.11. The site is located in Policy Area 2 – Northern Office/ Education/ Civic Centre and within a comprehensive employment development area. 	The site is accessible by car, bus, cycle and foot and is a brownfield site. 	Unavailable - site is occupied landscaped and is not large enough to host the proposed supermarket. 

Peel Street/Fenton Street	The site totals 0.24ha in size and is located west of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58.12. The site is located in Policy Area 8 – Town End. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Unavailable – site is developed / occupied by fast food outlet. ✗
Burleigh Street	Burleigh Street totals 0.4ha in size and is located south east of the principal shopping area.	Zone 1 ✓	Edge of Centre Site allocated as TC58/13. The site falls within Policy Area 5 – Southern Development Area. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not available or suitable – small site with inadequate access. ✗
Race Street Baths	The Site totals 0.28ha in size and is located south west of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58.14. The site is located in Policy Area 8 – Town End. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not available or suitable– small scale listed building unsuitable for foodstore use. Planning permission for conversion to residential use. ✗

St. Georges Burial Ground	The Site totals 0.42ha in size and is located south west of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58.15. The site is located in Policy Area 8 – Town End and is an Urban Greenspace Proposal. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not available – pay and display car park. ✗
Lambra Road	The Site totals 0.53ha in size and is located east of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58/16. The site is located within Policy Area 4 – eastern Development Area. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not available – Part of the Barnsley Markets scheme. ✗
Pontefract Road	The site totals 0.14ha in size and is located east of the principal shopping area.	Zone 1 ✓	Edge of centre site allocated as TC58/17. The site is located within Policy Area 4 – eastern Development Area. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not available – site is developed as a car showroom. ✗
Wortley Street	Wortley street site totals 0.28ha in size and is located south of the principal shopping area.	Zone 1 ✓	Town centre site allocated as TC58/18. The site is located within Policy Area 7 – Wellington Street Fringe. ✓	The site is accessible by car, bus, cycle and foot and is a brownfield site. =	Not available – site is occupied / in use as a nightclub. ✗

Shambles Street/Sackville Street	The site totals 0.85ha in size and is located west of the principal shopping area.	Zone 1 	Edge of centre site allocated as TC58.19. The site is located in Policy Area 2 – Northern Office/ Education/ Civic Centre and within a comprehensive employment development area. 	The site is accessible by car, bus, cycle and foot and is a brownfield site. 	Not available – the site has been developed as a residential led mixed use scheme (Gateway Plaza). 
Castlereagh Street/Foundry Street	The site totals 1.88ha in size and is located South of the principal shopping area.	Zone 1 	Edge of Centre Site allocated as TC58/21. The site falls within Policy Area 5 – Southern Development Area and under TC60/3 both of which identify it as being suitable for Employment Development. 	The site is accessible by car, bus, cycle and foot and is a brownfield site. 	Unavailable – the site is occupied / in use as a Morrison's. 
Metrodome/Oakwell	The site is located east of the principal shopping centre.	Zone 1 	Out of Centre site allocated as TC58/24. The site falls within Policy Area 4 – Eastern Development Area. 	The site is accessible by car, bus, cycle and foot and is a brownfield site. 	Unsuitable - The site is not sequentially preferable in terms of NPPF and is identified as being appropriate for leisure uses. 

5. Conclusion

- 5.1 It is clear from the above matrix that there is no site, currently available, which is sequentially preferable and suitable or appropriate for the proposed development. This also takes account of the other key policy considerations, which relate to the proposed redevelopment, namely the NPPF and the requirement for town centre uses to be located within the town centre wherever possible as well as the aims of the Core Strategy.
- 5.2 The proposed development is categorised as Less Vulnerable in the main with a small element i.e. the petrol filling station being classified as more vulnerable. Such uses are deemed to be appropriate within Flood Zones 1/2 without the need for an exceptions test, when no other sites are available in a sequentially preferable location.
- 5.3 The proposed development is for town centre uses and should be located within the town centre or within an edge of centre location. This limits the potential sites available to those listed in the matrix. A number of these sites have already been developed. Of those remaining a number are too small in scale to accommodate the proposed or have poor access, constraining development thus making the sites inappropriate for the proposed. Sites which could be appropriate are less sequentially preferable in retail terms or are unsuitable or unavailable.
- 5.4 NPPF directs development towards existing centres, promoting the vitality and viability of centres as important places for communities to meet people's everyday needs at the local level. The statement also seeks to ensure that other government objectives are met, notably enhancing consumer choice, supporting an efficient, competitive and innovative retail sector and improving accessibility.
- 5.5 A sequential assessment of the developments location with regards to the NPPF policy on retail uses is included as a separate document with this application.
- 5.6 In accordance with the Core Strategy Vision for Barnsley as "a uniquely distinctive 21st Century Market Town at the centre of a prosperous borough", the proposed development represents a significant investment in Barnsley delivering 300 plus (FTE) jobs and regenerating an underused, brownfield site.

5.7 The proposed provides a comprehensive approach to the reuse and redevelopment this brownfield site and aims to provide a new food store and community park for the benefit of local residents whilst also improving views at this key gateway into Barnsley Town Centre. In summary the development will deliver the following benefits:

- Fund the removal of the gas holder and remediation of the surrounding land;
- Deliver a high quality development in a strategic gateway location;
- Deliver permeable, accessible, greenspace linked to the wider countryside / green corridor along Dearne Valley;
- Provide high quality, sustainable retail buildings allowing the provision of increased competition and ensuring greater choice for shoppers;
- Provide new roads and bridges to take delivery vehicles off Twibell Street; and
- Create an environment that is vibrant and accessible to all.

Summary

5.8 The development site lies predominantly in Flood Zone 1 with a small section located in Flood Zones 2 and 3.

5.9 There are no sequentially preferable sites available or suitable for the proposed development.

5.10 The proposed will regenerate an underused brownfield site and deliver a number of key regeneration benefits to Barnsley.

5.11 On this basis the proposed passes the sequential test as required by the NPPF.