

Flood Risk Sequential Test Assessment

Village Hotel Bury, Waterfold Business Park, BL9 7BQ

On behalf of VUR Village Trading No.1 Limited

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1. Introduction and Background.

1.1. This report has been prepared in support of a full planning application and considers the application of the sequential test for development at the Village Hotel Bury, Waterfold Business Park, BL9 7BQ.

1.2. The planning application relates to:

'Erection of a 34-bedroom extension to the existing hotel including landscaping and associated works'.

1.3. The Site has already established the use of this site for hotel uses and this proposal would be located on the existing hardstanding. Nevertheless, the Local Planning Authority have requested that a Sequential Assessment is prepared in support of this application and accordingly, this document has been prepared and submitted as part of this application.

Site Location and Context.

1.4. The Site comprises of the existing Village Hotel which currently offers 128 bedrooms, as well as conferencing facilities, a gym, swimming pool, a Village Grill/Pub and a Starbucks Coffee Shop. The Site includes an existing staff and visitor car park with 371 spaces.

1.5. The hotel is bound by the River Roch and a dense landscaped buffer to the north and west, Waterfold Road and the M6 beyond this to the east and Waterfold Business Park to the south.

1.6. The hotel is located within Waterfold Business Park which is a designated primary employment area. It is located adjacent to junction 2 of the M66 motorway and has excellent access to the local and national highway network.

1.7. There are good pedestrian and cycle links within the vicinity of the Site. Bus services are available on the nearby A58 (Rochdale Road).

1.8. There are no environmental designations or listed buildings within the site boundary.

1.9. The high-level flood risk map, taken from Government's website, confirms that the building and the majority of the car park is within Flood Zone 1. Some of the car park and area around the hotel is located within Flood Zone 2 and the wooded area to the north and west of the site, along the boundary with the river which is within Flood Zone 3.

Proposed Development.

1.10. Village Hotels are seeking to extend the existing hotel in Bury to meet the growing demand for hotel rooms in this location.

1.11. The development proposal comprises of a 34-bedroom extension to the existing hotel, car port, landscaping and the remodelling of the car park.

1.12. The proposed extension is located to the south of the existing hotel and site and will have a rectangular footprint

- 1.13. The ground floor will incorporate car parking, and the upper floors will be used to accommodate additional bedrooms.
- 1.14. The general layout of the car park would be largely unchanged with minor alterations concentrated to the south of the hotel where the proposed extension would be located. The incorporation of an undercroft into the design of the extension has enabled an element of car parking to be maintained where the proposal will be located.

2. Planning Policy Considerations.

- 2.1. This Section considers planning policy and guidance relating to the application of the flood risk sequential test.

National Planning Policy Framework.

- 2.2. A revised draft of the National Planning Policy Framework (NPPF) was published in July 2024 with consultation running up until the end of September 2024. The changes made to the NPPF in December 2023 are proposed to be rescinded however this latest consultation goes further in line with the objective of supporting an increase in house building and delivering economic growth.
- 2.3. It is expected that the proposed draft will be adopted by the end of year. As such, the 2023 forms the adopted framework which applications should be considered on.
- 2.4. Nevertheless, no changes were proposed to the way flood risk should be dealt with and the application of the flood risk sequential test.
- 2.5. Paragraph 166 of the NPPF states that strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.
- 2.6. Paragraph 167 goes on to state that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual 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 and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); 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.
- 2.7. Paragraph 168 confirms that 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 of any form of flooding.

- 2.8. Paragraph 169 goes on to state that 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.
- 2.9. Paragraph 170 and 171 states that the application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. 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.
- 2.10. Both elements of the exception test should be satisfied for development to be allocated or permitted.

Planning Practice Guidance.

- 2.11. Planning Policy Guidance on Flood Risk and Coastal Change was first published in March 2014. The PPG confirms definitions of Flood Zones, from low to high probability of river and sea flooding and this is reproduced as Figure 1.
- 2.12. The PPG confirms that the aim of the sequential approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk¹.
- 2.13. The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:
- Within medium risk areas; and
 - Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas².
- 2.14. In terms of how the Sequential Test should be applied, this should be to all major and non-major development proposed in areas at risk of flooding, but it will not be required:
- The site has been allocated for development and subject to the test at the plan making stage (provided the proposed development is consistent with the use for which the site was allocated and provided there have been no significant changes to

¹ Paragraph: 023 Reference ID: 7-023-20220825

² Paragraph: 024 Reference ID: 7-024-20220825

the known level of flood risk to the site, now or in the future which would have affected the outcome of the test).

- The site is in an area at low risk from all sources of flooding, unless the Strategic Flood Risk Assessment, or other information, indicates there may be a risk of flooding in the future.
- The application is for a development type that is exempt from the test, as specified in footnote 56 of the National Planning Policy Framework³.

Figure 1 – Flood Zones

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
Zone 2 Medium Probability	Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise: • land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or • land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding). Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

³ Paragraph: 027 Reference ID: 7-027-20220825

- 2.15. It is worth noting that this site is located within an area which is allocated for development. It is located with the Waterfold Business Park which is an allocated primary employment area. However, despite this, we are not aware of any flood risk sequential assessment being prepared as part of the preparation of the Core Strategy or the Places for Everyone Plan to include this site.
- 2.16. The PPG categorises different types of uses and development accordingly to their vulnerability to flood risk ranging from 'Essential Infrastructure' (most vulnerable) through to 'Water Compatible' (least vulnerable). Hotels are considered to be 'more vulnerable'.
- 2.17. Table 2 in the PPG and Figure 2 below maps the vulnerability classes against the flood zones and indicates where development is 'appropriate' and where it should be permitted.

Figure 2 – Flood Risk Vulnerability and Flood Zone 'incompatibility'

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					

- 2.18. The site and the location of the proposed extension is within Flood Zone 2 and as indicated in Figure 2 the exception test is not required. This is an acceptable form of development in this location (subject to demonstrating accordance with the sequential test).

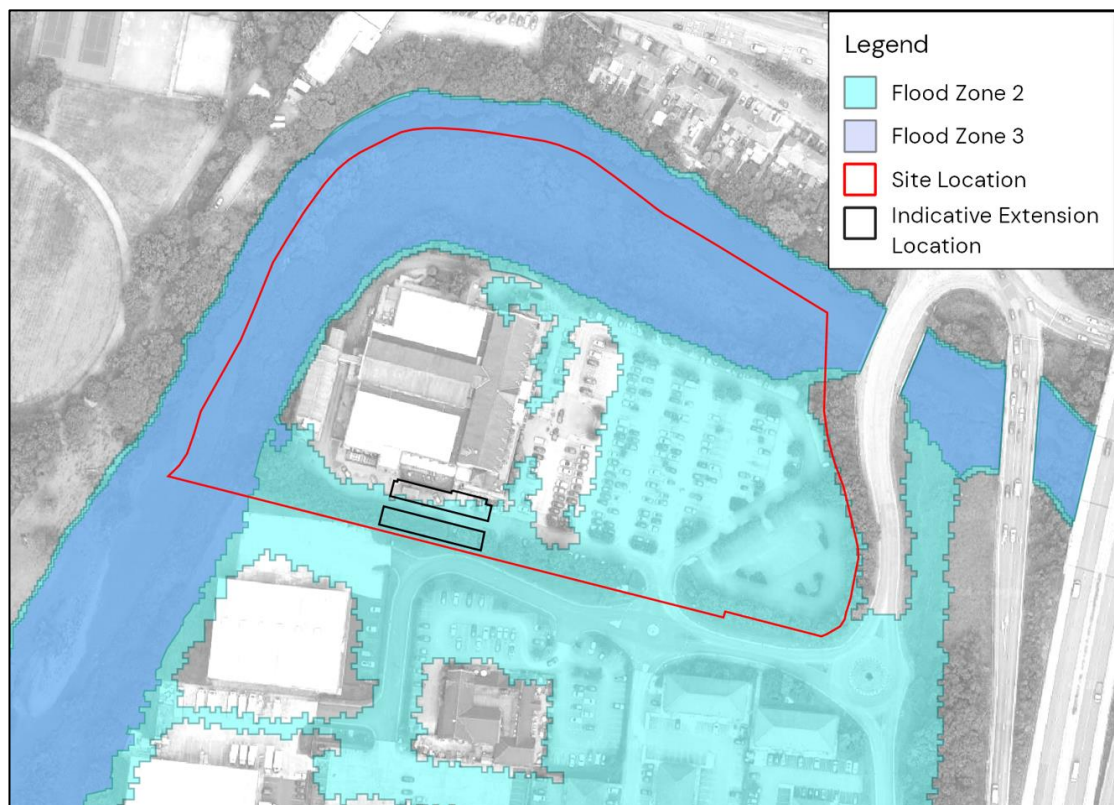
Local Planning Policy.

- 2.19. The Rochdale Core Strategy was adopted in October 2016 and sets how the Council's approach to flood risk and the application of the sequential test.
- 2.20. Policy G8 Managing Water Resources and Flood Risk states that the Council will ensure that new development does not lead to any increased flooding locally or further downstream does not impede natural water and flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating existing flood risk, is itself well protected from flood risk and ensures prudent use of water resources.
- 2.21. The Council require compliance with a sequential approach to new development and flood risk, directing development away from areas of high risk, in accordance with the NPPF.

3. Sequential Test.

- 3.1. As highlighted in the Flood Risk Assessment (which has been submitted as part of this application), parts of the Site are located within Flood Zone 1, Flood Zone 2 (which is where the proposed extension will be located) and some areas within Flood Zone 3 however this is not affected by the proposed extension or any associated works. This primarily relates to the wooded area to the north and west.

Figure 3 – Flood Risk Map



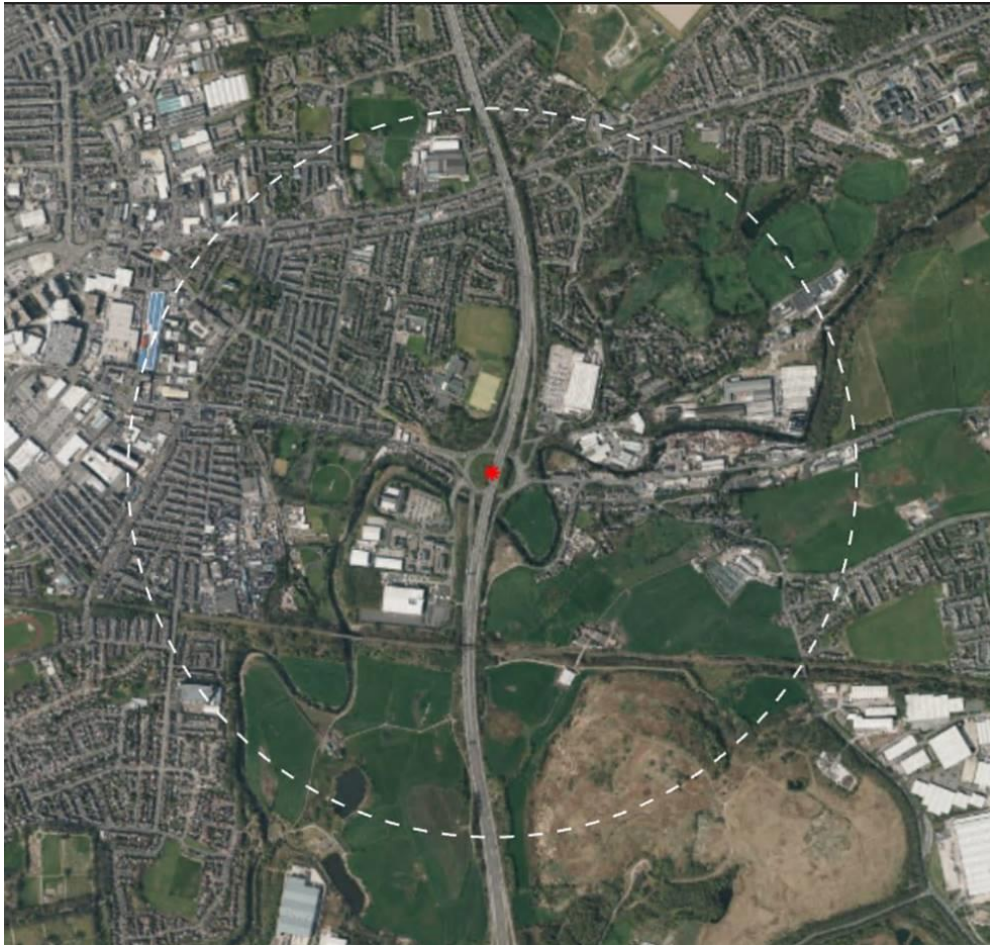
- 3.2. As already highlighted in the earlier sections, the proposed development is considered to be within the 'more vulnerable' classification. Given this, and the flood risk associated with the site, there is a requirement to demonstrate accordance with the flood risk sequential test. The following matters are considered in turn:

- Area of Search;
- Alternative Options for the Extension Within the Existing Site;
- Sites/Areas Which Have Been Discounted;
- Availability of Alternative Sites; and
- Conclusions.

Area of Search.

- 3.3. In terms of identifying an area of search, the PPG states that area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. When applying the Sequential Test, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.
- 3.4. An Area of Search has been agreed with Planning Officer, Rachel Carney. A proposed scope was suggested to the Council in an email dated 3rd July and this was agreed by the officer in an email dated 15th July 2024 (see Appendix 1).
- 3.5. The scope was agreed on the basis that this an extension to an existing hotel and would be located on existing hardstanding. The extension is required to support the existing use of the hotel and is an extension to an established and well-respected business. It would not be viable or make sense from a business perspective to find an alternative location which would need to accommodate the existing hotel and an extension.
- 3.6. A proposal for an extension to the existing use would need to be adjacent to and in connection with the existing hotel to support its current operation.
- 3.7. Secondly, the Council have accepted the use of this site for a hotel and have accepted this as a suitable location for a hotel. The hotel was constructed despite being with a Flood Zone 2 location and therefore this application should be considered in the same regard.
- 3.8. Thirdly, the extension is minor in nature when compared to the size of the existing hotel. As per the requirements of paragraph 027 Reference ID: 7-027-20220825 of the PPG, a pragmatic approach should be taken to the sequential test in this scenario. The extension will be placed on existing hard-standing, and the application has been accompanied by a detailed Flood Risk and Drainage Strategy which demonstrate that the flood risk will not be increased elsewhere and there will be no risk to the guests of the hotel.
- 3.9. In terms of the scope, the existing hotel serves guests who are travelling and commuting on the national highway network and therefore the extension and hotel would need to be located within close proximity and accessible to the motorway junction.
- 3.10. Many of the hotel guests are business guests and therefore any alternative site would need to be within easy reach of this motorway junction and the M66. The guests of the hotel choose to stay at this hotel due to its connectivity and easy in accessing the motorway network. As such, other locations within the borough would not serve the same needs.
- 3.11. On this basis, the following area of search has been agreed with the officer which is 1km around junction 2 of the M66.

Figure 4 – Area of Search for Alternative Sites



Alternative Options for the Extension Within the Existing Site.

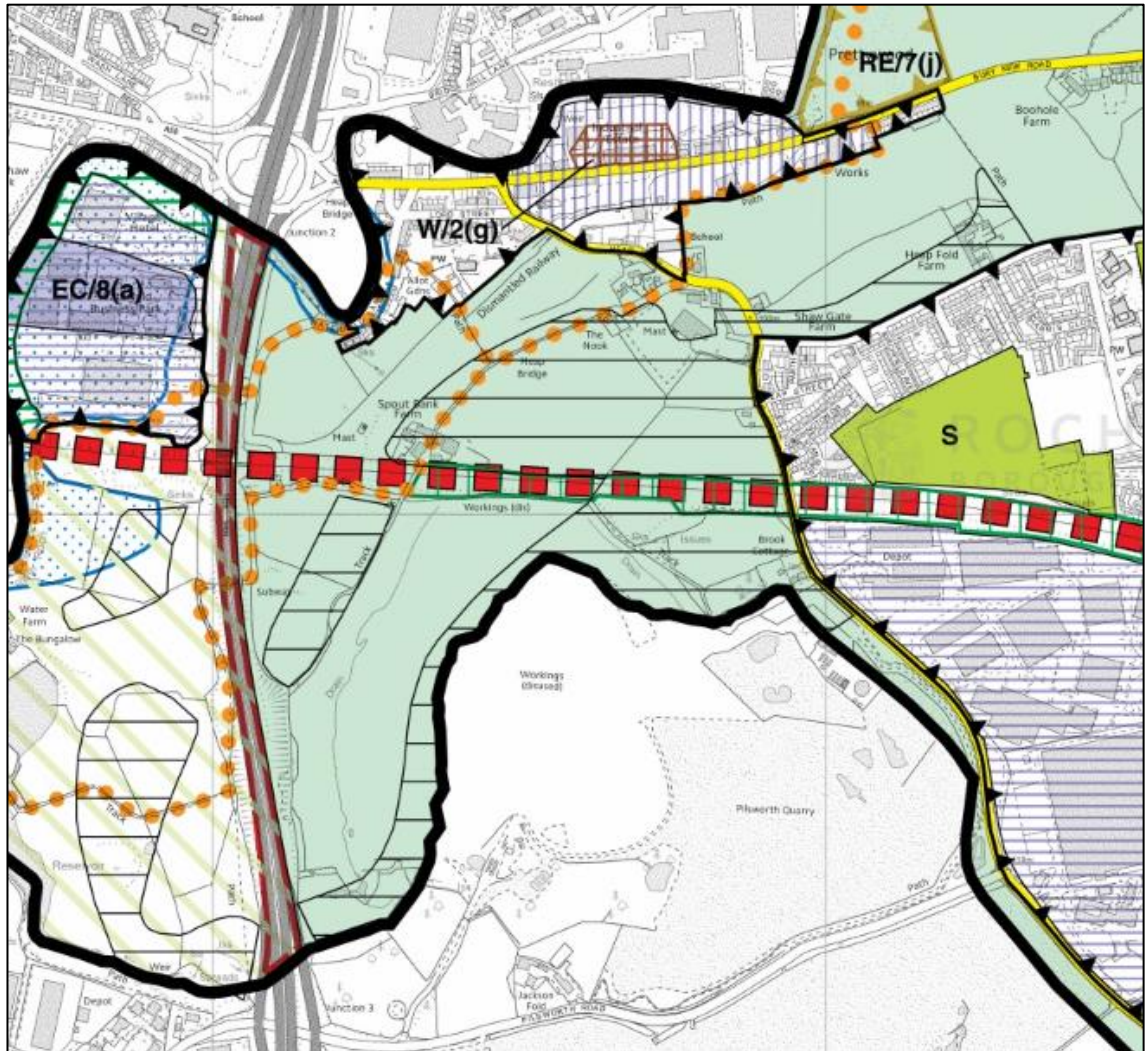
- 3.12. The design and location of the extension has been decided based on a detailed review of the whole site and all possible locations within the existing site to accommodate the extension have been considered.
- 3.13. Areas immediately adjacent to the north and west of the building have been considered however there is insufficient space to accommodate an extension in this location due to the presence of existing elements of the building and insufficient space for circulation. Furthermore, this area is closer to the areas of Flood Zone 3 and therefore a least preferable location.
- 3.14. The front of the building is not considered to be a suitable location for an extension as this is the main façade of the building and it is important to retain the symmetry of the front of the building and the grandeur of the entrance. The location of the extension of the building would negatively impact upon this.

Sites/Areas Which Have Been Discounted.

- 3.15. As shown in Figure 5 below, which is an extract from the adopted Policies Map, which shows that land to the east of the M66 and south of the A58 is adopted Green Belt land and

therefore this is not considered to be a suitable alternative location as the development of a hotel would not comply with Green Belt policy.

Figure 5 –Adopted Policies Map



- 3.16. In terms of the area to the south and to the west of the M66, which is included within the area of search, this is both located within a Flood Zone 2/3 zone from fluvial flooding and a risk of surface water flooding (see Figures 6 and 7 below). As such, the sites in this area would not be a sequentially preferable site to the existing hotel site.

Figure 6 – Flood Risk Map – Fluvial Flooding

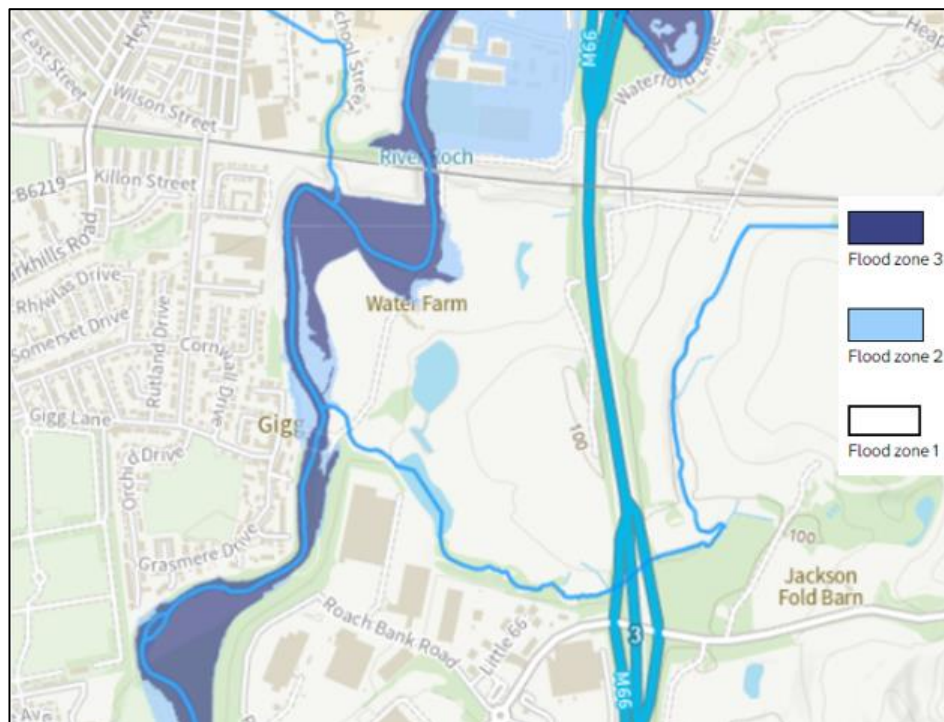
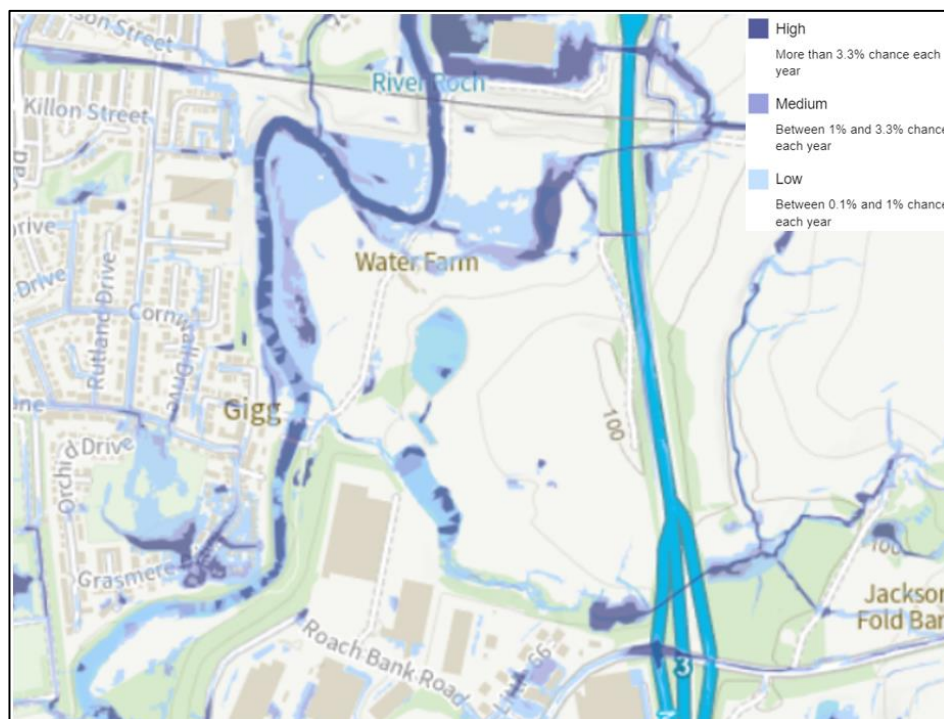


Figure 7 – Flood Risk Map – Surface Water Flooding



- 3.17. Furthermore, as shown in the adopted Policies Map in Figure 5, this area is protected open space, which is designated under UDP Policy D/10. Within this area, development is limited to; development which would be acceptable within the Green Belt, limited infilling, a limited extension to a building, is necessary for the establishment of a new enterprise or business

or is within the existing curtilage of the business. This proposal would not fulfil any of these exceptions and therefore would be contrary to Local Plan policies.

Availability of Alternative Sites.

- 3.18. This report considers the availability of reasonably alternative sites to accommodate the development within 1km of Junction 2 of the M66 which are not in a flood risk area from fluvial or surface water flooding or in a designated area within the Local Plan which prohibits the proposed development.
- 3.19. In order to be a suitable alternative site, the site must be available for development and be able to accommodate the proposed development which includes the existing hotel, an extension, and 338 car parking spaces. The Site measures 3.1 hectares (7.6 acres) so a site of around this size would be required to accommodate the entirety of the development.
- 3.20. In considering whether a site is available, we have had regard to its planning history, recent development history and the presence of active uses on site. We have also completed a full review of agent's websites.
- 3.21. Below we detail the availability of sites within this area of search.

168 Rochdale Road

- 3.22. The following property and associated land within the area of search is being actively marketed however it is not considered to be suitable for a relocation of the existing hotel, extension and car parking as it is significantly smaller than the land required.
- 3.23. This site measures 0.36 hectares and therefore although it is available and within a Flood Zone 1 location, it would not be capable of accommodating the hotel and the proposed development and therefore is not a sequentially preferable site.

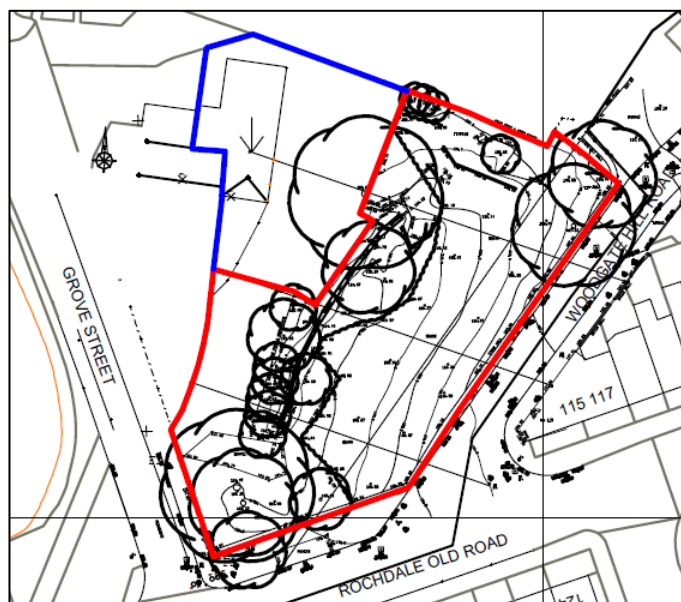
- 3.24. **Figure 8 – 168 Rochdale Old Road Photograph**



Land between 2 Ferngrove House, Rochdale Old Road and Woodgate Hill

- 3.25. This site is located between 2 Ferngrove House, Rochdale Old Road and Woodgate Hill and forms part of the gardens of 2 Ferngrove House (see Figure 6 below).
- 3.26. The site gained full planning permission in April 2023 (reference 68884) for 5no. new dwellings. Although the permission is extant and the site is available, it is being promoted for residential development and therefore is not available for a commercial development of this nature.
- 3.27. Furthermore, the site measures 0.5 hectares and is therefore too small to accommodate the proposed development.
- 3.28. Although the site is located within a Flood Zone 1 location, it is not big enough to accommodate the existing and proposed development and is not available for a commercial development. It is therefore not considered to be an available, alternative site.

Figure 9 – Site Location Plan



Land at Waterfold Lane

- 3.29. The site relates to the privately owned allotment gardens known as Roach Fold, to the rear of Waterfold Lane and measures 0.2 hectares.
- 3.30. The site gained outline planning permission in July 2022 (ref: 21/01345/OUT) for the erection of 5no. dwellings. Since this time, although a reserved matters application has not been submitted, the site is being actively marketed for residential uses and therefore it is not considered to be available for commercial uses.

Figure 10 – Site Location Plan



- 3.31. Although the site is located within Flood Zone 1, the site is too small to accommodate the existing hotel and therefore the site is not considered to be an alternative, available site.

Land to the south of the A58

- 3.32. The site measures 1.54 hectares and is located to the east of Junction 2 of the M66 (see Figure 5 below). It currently comprises of a greenfield site.
- 3.33. The site is too small to accommodate the existing hotel, the proposed extension and associated car parking as it is half the size of the existing site.

Figure 11 – Aerial View of the Site

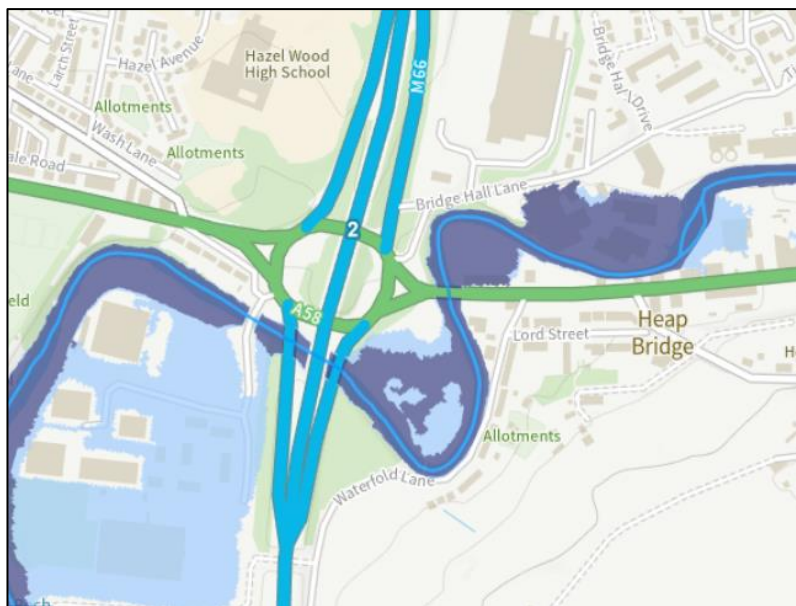


- 3.34. As shown in Figure 12 below, over 50% of the site is located within Flood Zone 3 meaning this Site is not sequentially preferable to the existing Village Hotel Site. There is a lot

flooding associated with the River Roch which runs to the south of this site and to the north and west of the Village Hotel.

- 3.35. There is no planning history for the Site to suggest that it is available or suitable to be brought forward for development. The Site is not being actively marketed and therefore is not considered to be available.
- 3.36. Furthermore, it would not be financially viable to relocate the entire business to a new location. It would be too costly and force the Site to close.
- 3.37. As such, the Site is not considered to be available or a sequentially preferable site.

Figure 12 – Flood Risk Map (Fluvial and Seas)



Conclusions.

- 3.38. This section has demonstrated that the sequential test has been passed and there are no available or sequentially preferable sites within the area of search to accommodate the proposed development.
- 3.39. The sequential test looked at the size of the site, the flood risk and the availability of each of the sites within the area of search and it can be concluded that there are no sequentially preferable sites.

4. Conclusion.

- 4.1. This report has been prepared on behalf of the applicant, VUR Village Trading No1. Limited in support of the full planning application for the bedroom extension at the Village Hotel, Bury.
- 4.2. The Flood Risk Sequential Test has been prepared in support of the application as the development site is located within Flood Zone 1, Flood Zone 2, and the wooded area along the boundaries with the river in Flood Zone 3. The extension is proposed to be located within a Flood Zone 1 and 2 location.
- 4.3. In terms of identifying an area of search for the Sequential Test, this was discussed with the planning officer (Rachel Carney) as part of the pre-application advice. The area of search was agreed at 1km of Junction 2 of the M66. The scope was agreed on the basis that the proposed was to support the existing use of the hotel and it would not be viable to find an alternative location for both the existing hotel and the extension, the extension is minor in nature and on existing hardstanding and the hotel services business guests who are travelling on the adjacent highway network.
- 4.4. It has been demonstrated that by application of the sequential test, there is no reasonably available alternative sites for the application proposal. It is evidenced that no alternative site exists to accommodate the development proposals in a location that can serve the same customer base as the existing hotel and that represents any lesser risk than the application site.
- 4.5. The application of the exception test would not be required as the area of land, which is located within Flood Zone 3, although is within the red line boundary, would not be affected by this proposal. The extension is solely in land within Flood Zone 1 and 2.

Appendix 1 – Correspondence with Rochdale Borough Council to Confirm the Scope of the Assessment

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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