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Critical Drainage Area Sequential Test

Address: 35A Smithy Bridge Road, Littleborough Rochdale

PROPOSED CONVERSION OF EXISTING GARDEN OUTBUILDING TO FORM COFFEE COUNTER SALES AREA ANCILLIARY TO THE EXISTING RESIDENTIAL USE.

Introduction

This Sequential Test has been prepared in support of a planning application for the conversion of an existing timber garden outbuilding located within the residential curtilage of 35A Smithy Bridge Road, Littleborough, to form a small-scale coffee sales counter ancillary to the existing dwelling.

The Local Planning Authority has advised that the site lies within a Critical Drainage Area as identified within Rochdale Metropolitan Borough Council's flood risk mapping and has requested the submission of a Sequential Test.

The applicant notes that the proposal relates solely to the conversion and re-use of an existing outbuilding within an established residential curtilage and does not involve the erection of a new building, an increase in the building footprint, or any significant operational development. Furthermore, the proposal is intrinsically linked to the host dwelling and its specific location. Notwithstanding this position, and without prejudice to the applicant's view that the development is highly site-specific in nature, this Sequential Test has been prepared in response to the Local Planning Authority's request.

The purpose of this document is to demonstrate compliance with the requirements of the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance relating to flood risk and the sequential approach to development.

Description of the Proposal

The proposal relates solely to the conversion of an existing timber outbuilding situated within the rear garden of the host dwelling. No extension to the building is proposed and no increase in built footprint would arise. The proposal involves only minor physical alterations comprising the installation of a serving hatch and limited internal fit-out works required to facilitate the preparation and sale of hot drinks and refreshments.

The use is intended to operate as a highly limited ancillary activity associated with the existing dwelling. The business would be operated solely by the occupants of the property, would rely upon services provided from the dwelling, and would not involve external staff, customer seating, servicing arrangements or independent operational infrastructure. Opening hours are restricted to short periods during the morning and afternoon and the facility is intended to serve existing pedestrian movement along the adjacent public footpath and nearby Smithy Bridge railway station.

Planning Policy Context

Chapter 14 of the National Planning Policy Framework seeks to direct development to areas with the lowest probability of flooding through application of the Sequential Test.

The aim of the Sequential Test is to ensure that where reasonably available sites exist in areas with a lower risk of flooding, development should be directed to those locations in preference to sites at greater risk.

Planning Practice Guidance confirms that the Sequential Test should be applied in a proportionate manner, taking account of the nature, scale and location-specific requirements of the proposed development.

The guidance also recognises that certain forms of development are inherently tied to a particular location and that the availability of alternative sites must be considered in the context of the specific proposal being advanced.

Site-Specific Nature of the Development

A fundamental consideration in this case is that the proposal is intrinsically linked to the existing residential property and the existing outbuilding within its curtilage. The application **does not** seek permission for a standalone commercial coffee shop capable of being relocated to an alternative site. Instead, it seeks permission for the adaptation of an existing domestic outbuilding to facilitate a small ancillary business operated by the occupants of the dwelling.

The proposal relies upon the existing dwelling for electricity, water supply, drainage, storage and day-to-day management. The operation cannot function independently of the host property and would cease to exist if separated from it.

The specific location of the outbuilding is also central to the proposal. The building directly adjoins a well-used public footpath connecting residential areas, local recreational routes and Smithy Bridge railway station. The proposal is designed specifically to serve existing pedestrian movements already passing the site rather than generating new trips or creating a destination use.

As such, the proposal is inherently site-specific and cannot reasonably be detached from its existing location without fundamentally changing its character, operation and planning merits.

Assessment of Reasonably Available Alternative Sites

In applying the Sequential Test, consideration has been given to whether there are any reasonably available alternative sites at a lower risk of flooding capable of accommodating the proposed development.

The proposal is not a conventional commercial development seeking a general retail location. Instead, it relates to the re-use of an existing outbuilding situated within the residential curtilage of 35A Smithy Bridge Road and operated as a small ancillary activity by the occupants of the dwelling.

The proposal is fundamentally dependent upon the host property. The outbuilding derives its utility services from the dwelling, storage is provided within the dwelling and the operation is managed entirely by the resident family. The use has been specifically conceived around the existing building and its relationship with the adjacent public footpath and nearby railway station.

The identification of alternative sites elsewhere within the Borough would not provide a realistic alternative to the development proposed. Any alternative location would require the acquisition or leasing of separate premises and the establishment of an independent commercial operation. Such an arrangement would fundamentally alter the character, scale and operational nature of the proposal and would no longer represent the development for which planning permission is sought.

The proposal is therefore inherently location-specific. Its justification is derived not simply from the existence of an available building but from the unique combination of an existing outbuilding, its direct relationship with the host dwelling and its position adjacent to an established pedestrian route connecting to Smithy Bridge railway station.

It is consequently concluded that there are no reasonably available alternative sites capable of accommodating the specific development proposed. Requiring the development to be located elsewhere would not redirect the proposal to a lower flood risk location but would instead result in an entirely different form of development unrelated to the application currently under consideration.

Sustainability Considerations

The proposal represents an inherently sustainable form of development.

The site is located adjacent to an established pedestrian route and within close proximity to Smithy Bridge railway station. The coffee counter is intended to serve existing pedestrian activity rather than generate additional travel demand. The development utilises an existing building and therefore avoids the environmental impacts associated with new construction. The proposal also supports a modest form of local economic activity whilst maintaining the primary residential function of the site.

Relocating the development to an alternative location would undermine these sustainability benefits and would likely require the creation of a separate commercial operation with a greater physical and environmental footprint.

Flood Risk Considerations

The proposal does not involve any increase in the footprint of built development and does not result in the loss of flood storage capacity.

No extension or enlargement of the existing structure is proposed and the development will not increase impermeable surfacing within the site.

The proposal relates solely to the reuse of an existing outbuilding and therefore represents a highly limited form of development in flood risk terms.

Whilst the site lies within a Critical Drainage Area identified by Rochdale Metropolitan Borough Council, the proposal itself would not increase flood risk on-site or elsewhere and would not compromise the operation of local drainage systems.

Conclusion

This Sequential Test demonstrates that the proposed development is inherently site-specific and that there are no reasonably available alternative sites capable of accommodating the development proposed.

The application relates to the conversion of an existing domestic outbuilding located within the curtilage of 35A Smithy Bridge Road. The proposed use is ancillary to the host dwelling, dependent upon the dwelling for its operation and specifically designed to utilise the unique relationship between the existing building, the adjacent public footpath and Smithy Bridge railway station.

Alternative locations would not represent genuine alternatives as they would fundamentally alter the nature, scale and operation of the proposal and would result in an entirely different form of development.

The proposal does not increase the building footprint, does not increase impermeable surfacing and would not increase flood risk either on-site or elsewhere. Accordingly, the Sequential Test is satisfied and the development is considered compliant with the flood risk objectives of the National Planning Policy Framework.