

# **FLOOD RISK SEQUENTIAL TEST**

FOR

PROPOSED NEW BUILD VEHICLE BODY REPAIR  
WORKSHOP

AT

W.MILLIGAN AND SONS, KING STREET,  
MILLOM, CUMBRIA. LA18 4BW

Date: November 2022

Ref: 4/22/2437/0F1

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# 1. Introduction

1.1 This Sequential Test has been applied to the planning proposal 4/22/2437/0F1, for an application to build a new vehicle workshop.

1.2 As the application site falls within Flood Zones 2 and 3, in accordance with the technical guidance set out to support the National Planning Policy Framework, a Sequential Test is required to demonstrate that there are no sequentially preferable “reasonably available” sites at a lower flood risk within a defined area.

1.4 The report assesses the current policy framework for conducting flood risk sequential tests, and the provisions of the existing and emerging development plan for the Borough

## 2. Background

- 2.1 In the site allocations and policies plan for Copeland, this land is referred to as MM13. The preferred use is “Retain in employment use; not allocated for new (housing) development.”
- 2.2 In the 50 years W.Milligan and Sons has been present on the adjoining land, it has only ever been waste land and no developments have been applied for.
- 2.3 W.Milligan and Sons purchased this land from Copeland Council in 2013, and the listed use of the land on the contract of purchase was “Workshop extension and customer parking.”
- 2.4 After placing soakaway drains and levelling the land so it became useable for parking in 2014. W.Milligan and Sons are now planning to develop their business on this land as was initially proposed in the purchase of the land to CBC .

## 3.Proposal

3.1 The application seeks to build a new vehicle bodyshop adjoining the existing vehicle workshop and bodyshop.

3.2 The companies who erect the buildings have advised that any new building needs to be at least 1.5 metres away from any other building, to allow access for machinery. As a result the original plan for it to be an extension of existing building with access door has been changed to standalone with a small gap to the existing.

3.3 With the proposed building on the same site, this will allow for the existing “staff sharing” where the business utilises the same administration team for Service/Repair as for Accident Repair and paintwork. The extra space will also allow technicians from the service and repair workshop to use lifts in the new building as overflow. These efficiencies will allow the new bodyshop to grow organically and will only need more staff/expense as it grows.

## 4.Site Analysis

4.1 The site is located off Millom Road, Millom, LA18 4BW.

4.2 It has always been undeveloped wasteland.

4.3 Due to being in flood zone 3, a Flood Risk Assessment undertaken by RG Parkins of Kendal has been submitted with the application. This goes in to great detail on an analysis of the site and surrounding area. The conclusion being the risk was only from coastal flooding and this could be easily predicted, with consideration given to flood resistance and resilience during the design and build.

## 5. Sequential test

5.1 The sequential test is required to demonstrate that there are no sequentially preferable “reasonable available” sites at the lower flood risk (i.e. in flood Zone 1) within a defined area.

5.2 On the local plan, the designated areas for development for employment are

(i) Mainsgate Road Millom. Referred to on the plan as MMA.

(ii) Devonshire Road Millom. Referred to on the plan as MMB.

Both of these sites are in Flood zone 3a so offer no real reduction in risk vs the proposed site. There are also no land or buildings available to purchase on either of these sites.

5.3 Currently on the market, there are no other suitable areas of land in the Millom area, extending to Millom without.

## 6. Conclusions

6.1 The new building is only viable if it is within a 100 yards of the existing business. This is so the staff can use both buildings and customers can utilise the large amount of parking already available. This is not a viable business plan as a separate “Standalone” new business.

6.2 The Local plan has allocated the proposed site as “employment”.

6.3 The local plan areas identified for growth in employment are both also rated as flood zone 3a.

6.4 There is no available land to purchase in or around the Millom area that is of similar size.

The conclusion is that the proposed site is the only suitable site for the expansion and growth of W.Milligan And Sons. It is clear there is no possibility in this coastal town of being able to find an alternative site that would offer a reduction to a flood risk 1.