

Mr James Stannard
High Peak Borough Council
Development Control
Municipal Buildings Market Place
Glossop
Derbyshire
SK13 8AF

Our ref: LT/2021/126210/01-L01
Your ref: HPK/2021/0019
Date: 17 August 2021

Dear Mr Stannard

**2 NEW DETACHED DWELLINGS
1A TURNLEE ROAD, SIMMONDLEY, GLOSSOP**

The Environment Agency were not originally consulted on this application. The application has been highlighted to us, and an updated flood risk assessment (FRA) was provided to us on the 27th July 2021. After review of the FRA and the application our response is provided below.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA from Floodplan Limited (Ref 00132 1A Turnlee Road dated 25 July 2021) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Take the impacts of climate change into account in setting finished floor levels, new climate change allowances have been published on 20th July 2021, see <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> for full details. We would recommend that additional 2D levels are requested around the proposed dwellings locations and on the access road.
- provide compensatory flood storage up to the 1% AEP plus the relevant climate change allowance event for the epoch concerned with the new dwellings' design life.
- demonstrate safe access and egress for the occupants throughout the lifetime of the development. Depth and velocities should be checked against the Flood Hazard Equation from "Flood Risks to People" - R&D Report FD2321/TR. Also, discussions should be held with the emergency planner and/or Greater Manchester Civil Contingency Unit. A new housing development proposal cannot expect for its users to evacuate through flood water if the depths are considered as hazardous. We would recommend for further 2D levels to be obtained from the Environment Agency.

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. Velocities associated with 2D levels can be obtained by contacting our customers and engagement team at Inforequests.gmmc@environment-agency.gov.uk. If this cannot be achieved we are

Environment Agency
Trent Side North, West Bridgford, Nottingham, NG2 5FA.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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likely to maintain our objection to the application. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Informative

This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of Long Clough brook, designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now [excluded](#) or [exempt](#). A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

The Environment Agency has discretionary powers to carry out maintenance works on the channels of "main river" watercourses to remove blockages and ensure the free flow of water. Information on riparian landowner's rights and responsibilities can be found at <https://www.gov.uk/guidance/owning-a-watercourse>

Information to the applicant

As part of the requirements for a Flood Risk Activity Permit, a fence or similar structure would be required to help delineate and protect the 2m buffer zone. We would therefore encourage this fence to be included as part of this new planning application. We would also encourage the removal of non-native planting within this 2m buffer zone

Yours sincerely

Mr Joseph Drewry
Planning Specialist