

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

Our ref: LT/2022/127281/01-L01
Your ref: HPK/2022/0376
Date: 14 October 2022

Dear Sir/Madam,

**THIS PROPOSAL IS TO BRING THIS EMPTY HOTEL BUILDING BACK TO LIFE WITH THE CREATION OF 20 APARTMENTS. THE EXISTING FRONTAGE IS RETAINED UNALTERED AND THERE ARE TWO SMALL EXTENSIONS TO THE REAR ELEVATION
GROVE HOTEL, GROVE PARADE, TERRACE ROAD, BUXTON, DERBYSHIRE, SK17 6AJ**

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 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:

- Consider how people will be kept safe from the identified flood hazards (in particular by stating the finished floor levels of the ground floor)
- Consider how a range of flooding events (including extreme events) will affect people and property. To assess should events request a product 4 and 8 data package by email at EMDenquiries@environment-agency.gov.uk
- Take the impacts of climate change into account. There is no assessment of the impact of climate change using appropriate climate change allowances. The 1 in 100 year 30% climate change climate allowance event should be used as the design flood. Guidance can be found at '[Flood risk assessments: climate change allowances](#)'.
- Consider the possible impact of a blockage scenario on the Spring Gardens and Bridge Street culverts and the potential impact this may have on the site.

The applicant must ensure they have assessed all flood risk including extremes to the site. This includes residual risk such as blockages within assets. Without an adequate assessment, the Environment Agency is unable to determine if the proposed development meets the National Planning Policy Framework, 2019 (i.e., that the proposed development is safe for future users for its designed lifetime). The 'River Wye SFRM, Halcrow, August 2010' model contains blockage scenario modelling for these culverts. Please see the below model report extract for the modelled flood heights as a result of a range of blockage scenarios:

“Blocking the Spring Gardens culvert by 25% caused a 57mm rise in water level, blocking the culvert by 50% caused large instabilities in the model and blocking the culvert by 75% caused a 196mm rise in water level. Blocking the Bridge Street culvert by 25% caused a 110mm rise in water level, blocking the culvert by 50% caused a 265mm rise in water level and blocking the culvert by 75% caused a 594mm rise in water level”.

The applicant should ensure that the development is adequately resilient to account for the highest potential culvert blockage. This could involve raising the finished floor levels and providing flood resistance and resilience measures. There should ideally be an additional 600mm freeboard to cover the residual risk resulting from greater capacity blockages.

As well as providing the finished floor levels (in meters above ordnance datum), the applicant will need to provide a topographical survey showing the existing site levels. This is vital in assessing the flood risk posed to the property and future occupants. The topographical survey will ensure the finished floor levels are adequate. The topographical survey will also ensure the Local Planning Authority can assess the proposed safe access and egress routes from the site during a range of flooding events. Please note the adequacy of this will be assessed by the Local Planning Authority. The applicant should also provide floor plans of the basement.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Yours faithfully,

Mr Joshua Milsom
Sustainable Places Planning Advisor

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