

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

Our ref: LT/2022/127281/03-L01
Your ref: HPK/2022/0376
Date: 27 March 2023

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

As this development poses an unacceptable risk to life and property from flooding, we object to this application and recommend that planning permission is refused.

The most recently submitted information does not address our previous objection, therefore we maintain our previous position and comments.

Reasons

The site lies within Flood Zone 3a, which is land defined by the planning practice guidance as having a high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life and property from fluvial inundation would be unacceptable if the development were to be permitted.

- The application does not demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. There is insufficient flood risk mitigation up to the design flood level with additional resilience to protect against increased flood depths during the event of a culvert blockage. Furthermore, there are no specified arrangements for safe access and egress.

The River Wye and its tributaries are capable of producing very rapid responses to major rainfall events on the source catchments of the adjacent moors. The rapid response of this type of catchment means that flood warnings can give only very limited notice of a potential flood event. The steep gradients upstream also mean that these watercourses can have high sediment and debris loads which can result in rapid blockage of culverts, bridges and any other 'in channel' restrictions.

The High Peak Borough Council Strategic Flood Risk Assessment (2014) states, "If it is proposed to re-use the existing buildings within the Flood Zone 3 area for 'more vulnerable' uses, Exception Test issues could be addressed by restricting ground floor use to 'less vulnerable' usages and only permitting 'more vulnerable uses' at first floor level. Since it is not possible to raise floor levels to an adequate height to mitigate

Environment Agency
npa - Bridgford Point Scarrington Road, West Bridgford, NG2 5BR.
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www.gov.uk/environment-agency

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against the significant flood depths predicted, we highly recommend that the arrangement of the site is revised so that the ground floor is not occupied by 'more vulnerable' sleeping accommodation.

Flood resilience measures should also be implemented to reduce the damage to property and lessen the time taken to recover after a flood. Your flood risk assessment should specify the height of the flood resilience measures in metres above ordnance datum. The development should be resilient to at least 600mm above the design flood level worst case culvert blockage scenario (291.73mAOD). Guidance is available at <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

Overcoming our objection

To overcome our objection, the applicant should submit evidence to demonstrate that the proposal will not pose a risk to life and property as highlighted above. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA and we'll respond within 21 days of receiving it.

Yours faithfully,

Mr Joshua Milsom
Sustainable Places Planning Advisor

Direct e-mail josh.milsom@environment-agency.gov.uk