

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

**Our ref:** LT/2022/127281/04-L01  
**Your ref:** HPK/2022/0376  
**Date:** 06 April 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**

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

**Condition**

The development shall be carried out in accordance with the submitted flood risk assessment (ref 10794G/FRA/03, dated April 2023, compiled by WML Consulting) and the following mitigation measures it details:

- Finished floor levels of the ground floor shall be set no lower than existing (289.80 meters above Ordnance Datum (AOD)).
- Finished floor levels of the first floor shall be set no lower than existing (292.65 mAOD).
- There shall be no habitable units below the design flood height of 290.54mAOD (habitable accommodation shall be limited to the first floor or above).
- Access to the basement shall not be permitted to the residents or the public.
- Resilience measures shall be implemented as per section 5.36 of the FRA.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

**Reasons**

- To reduce the risk of flooding to the proposed development and future occupants.

**Advice to LPA**

**We strongly advise that the LPA considers the high level of flood risk associated with this 'more vulnerable' development.**

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below:

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood

Where necessary, the advice of relevant experts should be sought.

### **Access and egress/emergency response**

It is the responsibility of the Local Planning Authority to decide whether the access and egress arrangements during a flood are acceptable or not.

**During a 1% AEP plus 30% climate change event, the ground floor of the development would be inundated with flood depths of 740mm (hazard rating of 'danger for most').**

Although the residential area on the upper floors would remain dry, the ground floor and areas around the proposed development site would be inundated during the design flood, with depths significantly heightened should culvert blockages occur. The journey to safe, dry areas completely outside of the inundation zone could involve crossing areas of fast flowing and deep floodwater. We strongly recommend that occupants remain within the upper floors of the development during a flood event.

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.

There are two culverts within close proximity to the development which have the potential for significant blockages to occur. The 'River Wye SFRM, Halcrow, August 2010' model contains blockage scenario modelling for these culverts. The increases in water level as a result of a range of culvert blockage scenarios are given below:

| <b>Flood event</b>                    | <b>Increase in water level</b> |
|---------------------------------------|--------------------------------|
| 25% blockage - Spring Gardens culvert | 57mm                           |
| 75% blockage – Spring Gardens culvert | 196mm                          |
| 25% blockage – Bridge Street culvert  | 110mm                          |
| 50% blockage – Bridge Street culvert  | 265mm                          |
| 75% blockage – Bridge Street culvert  | 594mm                          |

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/ users covered by our flood warning network.

Planning practice guidance (PPG) to the National Planning Policy Framework (NPPF) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal. We agree that this indicates that there will be a danger to most people (e.g. there will be danger of loss of life for the general public). This hazard rating could be higher during the event of a culvert blockage.

This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

### **Structural stability and internal risk to the development**

Buildings are at risk of becoming structurally unstable with external flood depths of 600mm and above. The flood depths on the ground floor could compromise the structural stability of the building. The applicant should provide appropriate structural survey and calculations to demonstrate that the building will be safe when subjected to the likely forces of flood water. High Peak Borough Council should consult an appropriate structural engineer to assess any proposals put forwards. The Wye SFRM 2010 hydraulic model includes flood velocity and depth information which can be used to assess the structural safety of the proposals.

During the design flood event (1% AEP plus 30% climate change) the basement would be completely submerged. A mitigation plan may be required to drain the basement post-flood event. In addition, we advise the applicant ensures any sensitive infrastructure such as gas and water pipes or electrical cabling are located and designed to withstand the potential impacts of debris within flood water.

### **Advice to applicant - signing up for flood warnings**

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what do after a flood, visit <https://www.gov.uk/after-flood>.

Yours faithfully,

**Mr Joshua Milsom**  
**Sustainable Places Planning Advisor**