

High Peak Borough Council  
Forward Planning  
Municipal Buildings Market Place  
Glossop  
Derbyshire  
SK13 8AF

**Our ref:** LT/2023/127765/02-L01  
**Your ref:** HPK/2022/0474  
**Date:** 17 May 2024

Dear Sir/Madam

**PROPOSED CHANGE OF USE FROM OFFICES TO 24 APARTMENTS AND  
ASSOCIATED CAR PARKING.  
CHARLESTOWN WORKS, CHARLESTOWN, GLOSSOP.**

Thank you for consulting the Environment Agency on the above application

**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 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. 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
- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- take the impacts of climate change into account
  - Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels.
  - Consequently the development proposes inadequate:
    - Flood storage compensation. Any development within flood zone 3 has to account for loss of flood storage like-for-like, including climate change.
    - Resistance and resilience measures

In addition, a section of Long Clough Brook is culverted within the red line boundary of this application and is in close proximity to the proposed development. Previous applications for this site have included opening the culvert to reduce fluvial risks; the current application makes no reference to this. We therefore ask to see, in detail, any proposals regarding the culvert.

**Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

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

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If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Yours faithfully

**Mr Jake Sharman**  
**Planning Advisor**

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