

FAO: Polly Harris-Gorf
South Holland District Council
Planning & Development
Council Offices Priory Road
Spalding
Lincolnshire
PE11 2XE

Our ref: AN/2020/130737/01-L01
Your ref: H09-0602-20

Date: 12 August 2020

Dear Polly

**Construction of 110, two, three and four bed 2 storey traditional residential homes with associated garages and access infrastructure.
Land north of Northons Lane and Oakwood Glade Holbeach Spalding**

Thank you for consulting us on the above application, on 30 July 2020.

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.

Reason

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.

The FRA (ref: 08-0048) dated 11 June 2020 does not adequately assess the risk of flooding to the development as the FRA incorrectly states flood zones and the expected depths of flooding for the lifetime of the development.

Flood zone

The site is within Flood Zone 3 rather than Flood Zone 2. Figure 2 has used the 'Risk of Flooding from River and Seas' map, which has been produced from our National Flood Risk Assessment (carried out in 2017), which takes account of the location, type and condition of flood defences. This map classifies the flood risk for area as either high, medium, low or very low.

The 'Flood Map for Planning (Rivers and Seas)' should be used to for Flood Zones. For your information, the whole site lies within Flood Zone 3.

Environment Agency

Nene House (Pychley Lodge Industrial Estate),
Pychley Lodge Road, Kettering, Northants, NN15 6JQ
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

Customer services line: 03708 506 506

*Calls to 03 numbers cost the same as calls to standard
geographic numbers (i.e. numbers beginning with 01 or 02).*

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Tidal hazard mapping

The Environment Agency's tidal hazard mapping affects the proposed site and shows the consequences should a breach or overtopping of our tidal defences occur. The results show the likely flood depths, velocities and overall hazard.

The site lies within future hazard category classified as 'low hazard' and 'danger to some' as defined in Research & development report FD2320 "Flood Risk Assessment Guidance for New Development" which provides an estimation of flood hazard. The site could experience flood depths of between 0 – 0.5 metres arising from a breach in the defences during a flood that has a 0.5% tidal chance of occurring in any one year up to 2115. These depths are also applicable to the 2115 0.1% scenario.

The flood risk mitigation measures proposed 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 up to 0.5 metres arising from a breach in the defences during a flood that has a 0.5% tidal chance of occurring in any one year up to 2115.

The South East Lincolnshire standing advice matrix 2016 sets out the following mitigation for the following flood depths:

Flood depths between 0.25m – 0.5m:

- Finished floor level to be set 500mm above ground level; and
- Flood resilient construction shall be used to a height 300mm above the predicted flood level.

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 consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of a condition on any subsequent approval.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Keri Monger
Sustainable Places - Planning Adviser

Direct dial 020 847 48545

Direct e-mail keri.monger@environment-agency.gov.uk