Environment Agency

Charlotte Dew
Huntingdonshire District Council
Pathfinder House St. Marys Street
Huntingdon
Cambridgeshire
PE29 3TN

Our ref: AC/2024/132511/01-L01
Your ref: 24/01885/PMBPA

Date: 20 December 2024

Dear Charlotte,

CHANGE OF USE OF EXISTING AGRICULTURAL BUILDING TO TWO DWELLINGS

BARN CHERRY LODGE FARM PUDDOCK ROAD WARBOYS

Thank you for your consultation dated 06 December 2024. We have reviewed the documents as submitted and we are objecting until an adequate Flood Risk Assessment (FRA) is provided which addresses our concerns. Please find information on how to overcome our objection as well as further advice on Flood Risk in the section below.

Flood Risk

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following 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 section of the Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks associated with the proposed development. In particular:

- The FRA fails to include all the available information on flood risk at the site.
- Adequately assess flood risk at the site
- The FRA fails to demonstrate that the proposed development will be safe for its lifetime, taking into account the effects of climate change.

The Environment Agency's Hazard mapping shows that the maximum flood depth on site could reach to depths of up to 1.3m. If internal flooding is unavoidable (and deemed acceptable), there should be no ground floor sleeping. In addition, appropriate flood resilience and/or resistance measures should be proposed.

Overcoming our Objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. The FRA must demonstrate that the development and its occupants will be safe in the event of overtopping and/or breaching of the tidal defences for the development's lifetime (considered to be 100 years for residential)

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

Sequential Test

In accordance with the National Planning Policy Framework (NPPF) paragraph 168, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It is for the Local Planning Authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the NPPF. Our flood risk standing advice reminds you of this and provides advice on how to do this.

Exception Test

With regard to the second part of the Exception Test set out in paragraph 170 of the NPPF, your Authority must be satisfied with regard to the safety of people (including those with restricted mobility), the ability of such people to reach places of safety, including safe refuges within buildings, and the ability of the emergency services to access such buildings to rescue and evacuate those people.

Emergency Planning

In all circumstances where flood warning and evacuation are significant measures in contributing to managing flood risk, we expect local planning authority to formally consider the emergency planning and rescue implications of new development in making their decisions.

We strongly recommend that your Authority's Emergency Planner is consulted on the above issues.

Advice to Applicant

Our Customer & Engagement Team can provide any relevant flooding information that we have available. They can be contacted via email at: Enquiries_EastAnglia@environment-agency.gov.uk

Any proposed flood resilient measures should follow current Government Guidance. For more information on flood resilient techniques, please see the Department for

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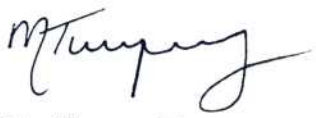
Communities and Local Government (DCLG) guidance document "Improving the Flood Performance of New Buildings – Flood Resilient Construction", which can be downloaded from the following website:
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

We trust that this advice is useful.

Yours sincerely,



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