Environment Agency

Kevin Simpson
Huntingdonshire District Council
Pathfinder House St. Marys Street
Huntingdon
Cambridgeshire
PE29 3TN

Our ref: AC/2025/132777/01-L02
Your ref: 25/00782/PMBPA

Date: 22 May 2025

Dear Kevin,

CONVERSION OF AGRICULTURAL BARN TO SINGLE DWELLING (WITH DEMOLITION OF ONE OF THE EXTENSIONS TO THE BARN)

AGRICULTURAL BUILDINGS STONE FARM THE HOLLOW RAMSEY

Thank you for your consultation dated 06 May 2025. 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 demonstrate that the proposed development will be safe for its lifetime, taking into account the effects of climate change.

The FRA reference 2898 is dated June 2022, and appears to relate to a previous planning application at the site for a replacement dwelling, while the present application concerns a conversion of the agricultural barn to a dwelling. Parts of the FRA need updating to reflect this. The FRA needs to establish what the existing ground level of the site around the barn is, the predicted flood depth, the current FFL of the barn, and whether this will be updated as part of the conversion in response to the breach flood risk. The Environment Agency's tidal hazard mapping indicates a breach flood depth of 0-0.25 m at the site and the FRA states that ground levels around the agricultural barn are between 0.8 m AOD and 1 m AOD. References to finished floor level (FFL) within the FRA are currently unclear as the threshold level

of the existing barn is stated as 1.23m AOD, but also states a FFL of the proposed dwelling (which is now being converted from the existing barn) at 0.95m AOD. The FRA needs updating to clarify the FFL in line with the current proposal.

Similarly, the FRA repeatedly states that there will be no ground floor sleeping accommodation as part of the mitigation measures and that there will be provision of a safe refuge, but the new proposed floor plan document reference ST-FRM-BRN-02 indicates that all accommodation will be on one floor level, with ground floor sleeping accommodation proposed. The FRA should additionally be updated to reflect these changes.

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 174, 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.

Safety Measures

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.

In all circumstances where flood warning and evacuation are significant measures in contributing to managing flood risk, we expect 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 Planner to determine whether the proposals are safe, in accordance with paragraph 181 (footnote 63) of the NPPF and the guiding principles of the Planning

Practice Guidance.

We are aware that your Authority may currently be subject to the 'presumption in favour of sustainable development'. Given our objection on flood risk grounds, we would like to highlight that in this case, as set out in NPPF footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal. If our objection on flood risk grounds is subsequently withdrawn, you can disregard this paragraph.

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

[redacted]

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