



Flood Risk Assessment - EA Objection – Ref NO/2023/115662/01-L01 - RESPONSE

We have reviewed the EA's letter of objection in relation to planning application 3/2023/0754. The EA give 4 reasons, each of which we have duplicated below, together with our response for consideration.

1. Identify pre and post-development ground levels

Review of the topographical survey shows the site is generally flat with shallow fall, generally from east to west. As the intention is to deliver a permeable storage yard and car park, there is no intention to alter existing ground levels and we can therefore confirm that ground levels will be the same, or lower than existing.

2. Evidence that there will be no displacement of flood plain storage

Given levels will be no higher than existing, topographically, by default, there can be no displacement of flood plain storage. In fact, given the ground will be resurfaced in a porous solution, storage volumes will be increased accordingly due to the open nature of the sub-strata. The business owner has also stated "It would not be our intention to create significant obstruction to flood flow and sympathetic storage layout will be implemented. If anything, the addition of the larger area will improve our current layout, which due to volume, could be considered more obstructive".

3. Demonstrate that the proposal will not increase flood risk off site

For reasons stated in points 1 and 2 above, it is expected that the inclusion of large areas of porous pavement will likely have a positive benefit on flood risk elsewhere

4. 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

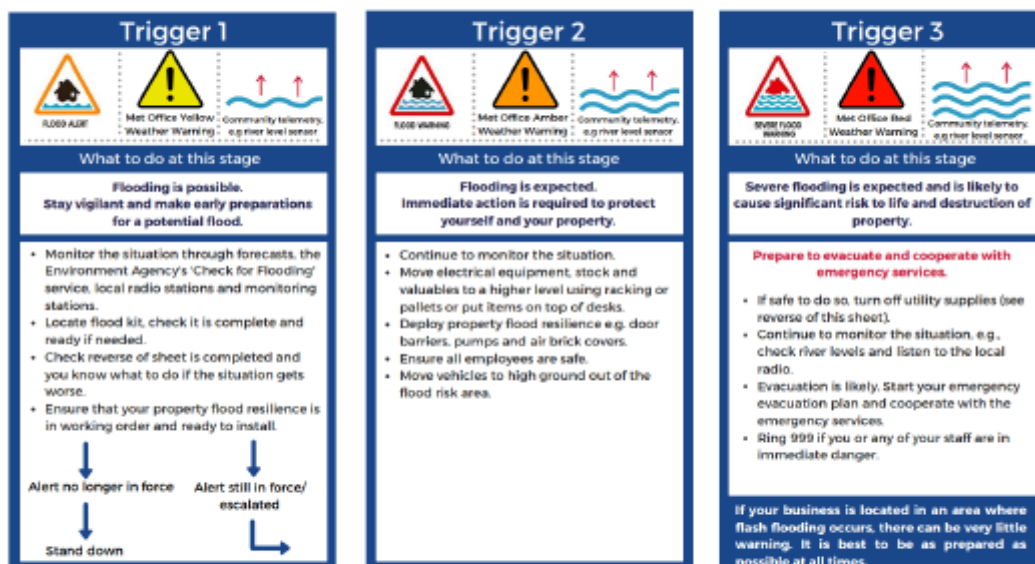
Flood evacuation was considered in the submitted FRA and is reproduced below.

Flood Plan Method Statement

The existing business benefits from an established flood plan and is registered for advanced flood warnings with the Environment Agency. The evacuation plan is included as **Appendix D** for reference. It is recommended that this statement is updated to include specific reference to systematic procedures to address cars parked on the car park and members of staff / visitors on site.

The plan should provide clear instruction that sets out safe evacuation routes from the site and designated assembly locations as appropriate. The entrance to the site (and beyond) is located outwith an area at risk of flooding, so any such evacuation route could be easily defined given the route out of the business is in affect directly away from the source of flooding.

A typical 3 stage trigger plan is illustrated below. The proposed plan should aim to provide a similar systematic strategy.



The provision of a suitable updated flood evacuation plan would be drawn up in consultation with the LLFA and could, if necessary, be secured by condition.

Pertinent to all the above points, and extracted from the submitted FRA, "It is confirmed that the proposed development is not anticipated to result in an increase in the number of vehicles, either cars or larger vehicles, visiting the site. The purpose of the proposals is to simply improve parking arrangements and site circulation to ensure that all visitors to the site, including pedestrians, cycles, cars, vans and HGVs can be safely accommodated within the site and can manoeuvre safely with minimal conflict between modes of travel"

Finally, all the above can be secured by condition.

Therefore, in summary, we feel that the site can be safely developed in a compliant manner and if anything is likely to marginally benefit flood risk both on site and the local area.

Kind Regards
Graham Sanderson