
From: Lambert, Bev <bev.lambert@environment-agency.gov.uk>

Sent: 20 August 2020 17:22

Subject: RE: FRA report - comments from planner for MM

Hi Chris

Further to your email this morning and also refer to previous emails and discussions between us, yourself and Alex Fraser. This proposed mixed use development is considered to be 'more vulnerable' development under the NPPF. We have identified the following issues with the submitted documents and the assessment of flood risk which require further clarification:

- There are a number of discrepancies on the elevation drawings showing differing finished floor

levels which need to be clarified. For example, in the lower ground floor flats where the 1m finished floor level raising is proposed, the level appears lower than one of the existing FFLs. We note that the road level on Bradford road is considerably higher than the wine bar FFL, however it is not clear whether this could be an error in the OS base mapping.

- The FRA has assessed modelled flood levels at the upstream node point, this indicated that flood levels are likely to be above the proposed floor levels. There is no hydraulic assessment to demonstrate that the raised floor levels will provide acceptable flood risk mitigation.
- The FRA mentions (following their site visit) that the upstream topography is a steep channel so flood levels will be higher, whereas downstream the gradient is shallower so levels will be lower. The FRA states there is still a chance flood levels will be above the finished floor level. We assume this means the wine bar rather than the lower ground floor flats and request this is made clear. The FRA should attempt to quantify this flood risk and identify if any flood mitigation/resilience is required.
- We advise that the FRA should consider existing flood risk mitigation upstream (ie the flood defence system upstream of the culvert) and confirm that they are of a sufficient height to retain the 1% plus climate change levels. If so, it might be possible to assume only residual risk to the development. Also, the Environment Agency maintains a trash screen upstream of the culvert on Batley Beck at Carlinghow, therefore the risk of channel blockage is likely to be reduced in this locality.
- We should be able to provide modelled defended and undefended outlines to assist with the assessment of risk, along with PDF maps of the 2D depth grids that indicate the most likely flood routes and the impact on the development in a range of modelled scenarios. It should be noted however that if we provide this information it will only be indicative and would require verification by more detailed analysis.
- The FRA considers the 1% levels at the upstream node and previously considered the 1% levels at the downstream node. The FRA should consider the 1% levels plus climate change to the site making an assessment of the two levels and any flood risk mitigation required. Our Batley Beck model was produced in 2015 with 20% allowance for climate change rather than the most up to date allowance for climate change which should be applied to the 1% level. Further guidance on this is available at the following link [climate change allowances](#)
- The FRA should consider potential flow routes around the building from both fluvial and surface water, and identify the level of flood risk this may pose to the building and for safe access and egress. You may wish to use any topographic survey levels in the vicinity of the building to assess these flow routes and associated hazard and whether any flood risk mitigation or flood resilience is required to the wine bar or flats.
- We note two of the lower ground floor flats access an upper floor safe refuge via an external spiral stair case which requires occupants to leave the building at ground level to access this in the alley way. The FRA should consider the flood risk associated with this access and whether internal access might be possible for the flats on the lower ground floor. The FRA should consider any flood risk associated with the ground floor access/egress onto Station Road and if any mitigation is required, and likewise from the wine bar onto Bradford Road.

Although not our remit, the spiral staircase may be unsuitable for any habitants of the lower ground floor with any mobility issues. The flood risk and associated hazard with access and egress should be considered in the emergency plan and evacuation plan.

We are happy to attend a virtual meeting as a way forward to discuss these issues with yourself, the LLFA and the applicant/architect to ensure they understand what they need to do to resolve them.

However, the applicant should be made aware that such meetings are considered to be outside of our statutory remit for planning and we would look to recover our costs from them. As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 plus VAT per officer per hour. We will provide an estimated cost for any further discussions or review of documents. The standard terms for our charged for service are available [here](#).

Kind regards

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Sustainable Places - Planning Advisor and Assistant Flood Warning Duty Officer

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