

Cheshire West and Chester Council

Regulation 18 Local plan – Issues and Options 2025

Representations on behalf of Mr C Stubbs

August 2025



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1. These Representations are made on behalf of Mr C Stubbs, the owner of land off Webbs Court, Northwich, also known as land at the rear of London Road, Northwich.
2. The author of this document is Planning Consultant Susan Jones, BA (hons) BPL MEWI Affiliate member of the RIBA. Mrs Jones has a planning career spanning more than 40 years and has operated throughout Cheshire for a large part of her career as well as other parts of the UK. She has been involved with this site on behalf of Mr Stubbs since 1992 and is familiar therefore with its planning history including during the time of the former Vale Royal Borough Council. She lives within the administrative boundary of Cheshire West and Chester Council (CWAC), is very familiar with the geography of the area as well as current planning policy restrictions including the location of the subject site beyond the settlement boundary but in very close proximity to it. She is also very familiar with up-to-date national policy and guidance (NPPF and associated NPPG) as well as the council's deliverable housing supply position at 1/04/2025 of 1.89 years. She understands therefore that there is currently a significant shortfall of housing land supply for the borough with a 5 year supply requirement of 10,038 dwellings which equates to an annual housing requirement of 1,912 dwellings. The need to make provision for significant housing growth within the borough through this updated plan is therefore critical.
3. These representations take the form of a stand-alone document rather than through the council's online consultation portal. Nevertheless, throughout this document specific topics of interest to Mr Stubbs will be referred to so it should be a straightforward exercise for planning officers to interpret what is being conveyed. In broad terms Mr Stubbs is concerned that policy officers, in identifying potential growth areas for Northwich within its Regulation 18 document, have overlooked the area within which this site is located and perhaps is unaware of the planning history of the subject land.
4. It is noted at para 1.19 of the Issues and Options document that certain additional evidence is needed to support the local plan. This includes a housing needs assessment, Green Belt study, infrastructure delivery plan and transport assessment. All of these have yet to be prepared. However, it is confirmed that a Strategic flood Risk Assessment is currently under preparation. Mrs Jones has therefore advised Mr Stubbs of her concern that at this stage significant areas of work have still to be carried out/ completed. Therefore, without that evidence base in place the value of identifying potential growth areas at this stage for members of the public to comment on is very limited, maybe misleading and could change significantly as this plan evolves. Furthermore, later on in the

Regulation 18 document at paragraph 5.12 it is confirmed that the exercise of identifying potential growth areas has excluded areas of land which are subject to constraints including areas of flood risk. Flood risk is a material consideration but as demonstrated below, there are significant parts of the subject site which have a low risk to flooding when last reviewed and therefore the development of the site is feasible.

Planning History

5. The existing development immediately adjoining the subject site was approved on appeal (see Inspector's decision letter – Appendix A) in relation to planning application APP/2001/0033. Susan Jones was involved in that scheme and at the time Mr Stubbs owned both sites. As is evident from the application documents on the council's website part of the subject site originally included a building which was subsequently demolished.

6. The subject site was the subject of a planning application in 2004 (LPA ref: APP/2004/0313). That application was refused consent on 17/05/2004. The application proposed the erection of 12 one- and two-bedroom apartments, and the proposed scheme included appropriate flood risk measures (see Appendix B). The reasons for refusal as a result did not include any objection on the basis of flood risk. At that time the former council were well placed with respect to housing land provision on brown field sites within the urban area. The situation now is quite different.

Flooding

7. The most recent flooding assessment of the subject site was in 2014 and was carried out by Enzygo. A copy of the Flood risk notes at the time recommended a proposed scheme involving sequential development would be appropriate (see Appendix C). Therefore, on the basis of what has occurred previously and the position the council finds itself in now concerning housing land supply Mrs Jones can see no reason why this site should not now be considered for future growth.

Regulation 18 local Plan Version

Spatial Strategy

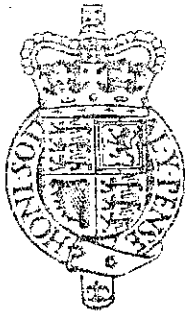
NO1, NO2

8. **YES**, in principle the suggested approach for Northwich is agreed and recognising the importance of reuse/ redevelopment of redundant sites is welcomed. The

subject site was formally part of the abattoir use on the larger site (including the land which was the subject of aforementioned application APP/2001/0033). Its former use therefore expired now many years ago and it has since become vacant and currently appears to be used as a dumping ground for local residents' waste and as a dog's toilet. The land plays no part in the attractive landscape of the wider Dane Valley and has a closer affinity with adjoining residential development. Although it is accepted that it is a relatively small site and therefore may not fall within the council's definition of "*key allocations/ sites*", it is considered that it should still be looked at favourably for development and the contribution it would make to the council's housing land supply shortfall, particular given its close proximity to the town centre of Northwich and local footpath network.

APPENDIX A

APPEAL DECISION NOTICE



Appeal Decision

Hearing held on 8 October 2002

Site visit made on 8 October 2002

by **D L Burrows DipTP MRTPI**

an Inspector appointed by the First Secretary of State

The Planning Inspectorate
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Bristol BS1 6PN
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e-mail: enquiries@planning-
inspectorate.gsi.gov.uk

Date

Appeal Ref: APP/L0635/A/02/1089431

Land off London Road/Hollands Road, Northwich

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by J S Bloor (Wilmslow) Ltd against the decision of Vale Royal Borough Council.
- The application (Ref.APP/2001/1506), dated 15 October 2001, was refused by notice dated 9 April 2002.
- The development proposed is a residential development comprising 17 1 and 2 bedroom apartments (3 storey), 1 1 bedroom house (2.5 storey) and 5 3 bedroom semi/terraced houses.

Summary of Decision: The appeal is allowed and planning permission granted subject to conditions set out in the Formal Decision below.

Procedural Matters

1. At the Hearing an application for costs was made by J S Bloor (Wilmslow) Ltd against Vale Royal Borough Council. This application is the subject of a separate Decision.

Background Information

2. At the time of making the decision the Council was content that subject to appropriate conditions and the provisions of the Section 106 unilateral undertaking produced by the appellants that the development would make use of previously developed land within the urban area in a sustainable location and would provide a housing mix at an appropriate density. Also as the London Road frontage of the site lies within the Northwich Conservation Area it was satisfied that the development would preserve and enhance the character and appearance of the conservation area which covers the central area of the town. In all these respects there was no dispute between the Council or the appellants that the proposed development was in accord with both development plan and national policy guidance. The Council's position was confirmed in its pre-hearing statement and at the hearing the Council's witness re-iterated that this was still the Council's view. After considering all the information before me, I see no reason to disagree with the parties on these matters.
3. The appellant company and the Council had further agreed during the course of negotiations that the flood compensation scheme proposed in the T A Millard Partnership report 2392/02/JPC/11-01/144 dated November 2001 would meet the objections to that part of the development which was within the indicative flood plain on the proposals map of the Vale Royal Borough Local Plan First Review and/or below the 15m AOD contour level. Again I see no reason to disagree with the parties on these matters.

4. In the documents submitted before the hearing the only remaining issue between the parties related to the risk of land instability/flooding because of the potential erosion processes of the river Dane.

Main Issue

5. From all I have seen, read and heard I consider the main issue to be whether there would be an unacceptable risk to properties from the future meandering of the river Dane in terms of ground stability and/or flooding.

Planning Policy

6. The development plan includes Cheshire 2011 Replacement Structure Plan (SP) and the Vale Royal Borough Local Plan First Review (LP). In respect of the main issue the most relevant policies are SP policy GEN1 which says that in local plans, allocations of land for development should not be located where there is a significant unavoidable risk from flooding. Para 6.11 of the explanation of the policy says that local authorities are expected to liaise with the Environment Agency on flooding matters. The objectives of this policy are repeated in policy GEN3.
7. In the LP the majority of the appeal site is allocated under policy H2.03 for housing development. The remainder of the site lies within an area shown on the proposals map to be at risk from flooding. In such areas policy NE15 says that new development will not be allowed unless appropriate flood protection and mitigation measures are provided as part of the development. The policy goes on to say that at sites suspected of being at risk from flooding, but for which there is no adequate information developers will be required to carry out investigations to evaluate the extent of the risk.
8. Since the adoption of the LP the government has issued Annex 2 to PPG14: Development of Unstable Land, Subsidence and Planning; and also PPG25: Development and Flood Risk which applies the precautionary principle and seeks to preclude development in areas of flood risk.

Reasons

9. At the opening of the hearing the Council confirmed that the Environment Agency had withdrawn its objection to the development by letter dated the 23 August 2002. As the Council were reliant on the Environment Agency to give evidence in respect of the risk of flooding from river erosion and as the Environment Agency's statement had been returned because it was submitted after the deadline set for its receipt there was no substantive evidence to justify the reasons for refusal and the Council effectively withdrew its objections on these grounds as well.
10. The Environment Agency's original objections appear to be based on the fact that any remedial works would be beyond the financial resources of the householders and would not accord with the Agency policy of allowing natural river processes. In respect of the former it seems to me that the possibility of future expense to householders from a potential movement of the channel, which has not been quantified in any way, is not a sound reason to justify refusal of planning permission. PPG14 Annex 2 and para 13 makes it quite clear that developers should ensure that their developments are safe and people are not put at risk. In this case there is no suggestion that any part of the site would be at risk from flooding because of ground levels or unexpected instability of the ground. The appellant has

undertaken technical investigations which confirm these views. Neither the Council nor its technical advisers have brought any substantive evidence which seriously challenges these opinions.

11. With regard to the second reason, I understand that the objection was withdrawn when negotiations on land to the south of the appeal site revealed that in the event of river erosion the sewers in the locality would be protected in situ. These sewers are, in places, closer to the former meander of the river than the proposed houses. The policy of not interfering with natural river processes could therefore be first compromised by works to protect the sewers.
12. Given the lack of any objection to the proposal on the grounds of potential river erosion and from the evidence I saw, heard and read I consider that there is insufficient reason to justify refusal of the scheme and that the development should be permitted.

Conditions

13. I have looked and modified the extensive list of conditions suggested by the Council in the light of Circular 11/95.
14. The application does not stipulate details of materials to be used in construction, I shall therefore require details to be submitted in the interests of visual amenity. Similarly suggested landscaping conditions 5 and 6 are required for the same reason. The plans are not complete as there are no side or rear elevations and no first or second floor ground plans for the block containing units 1-12. It is particularly important that these details are supplied as the frontage of the site lies within the conservation area. Suggested conditions 4 and 21 are necessary to ensure that the development is not at risk from flooding.
15. I consider it necessary to require details of proposed boundary treatment to ensure a satisfactory relationship with the surroundings, particularly the open land to the north and east of the development. Floodlights and security lights can have a profound impact on the living conditions of neighbours, I shall therefore require details of any such lights to be submitted for approval to the Council. The middle portion of the site was formerly used as an abattoir I shall therefore require a survey to identify any ground contamination. In the interests of highway safety it is important to ensure that the proposed access and parking/circulation areas are constructed before the development is brought into use; and also that wheel wash facilities are provided during demolition and construction.
16. In my view there is no necessity to impose a condition requiring all bathroom windows to be obscure glazed as this is the usual practice and there are no circumstances to suggest it would be otherwise at the appeal site. Given the location of the one bedroom house on the London Road frontage, its restricted site area and its close relationship with adjacent buildings together with its location within a conservation area, it is in my view necessary to control permitted development rights in the interests of the appearance of the locality. However I reach a different conclusion for the terrace of 5 houses on the eastern part of the site which would not be in a particularly sensitive area, would be in a relatively secluded location and which would in my view have adequate rear gardens.
17. The Council seek a noise survey to assess noise from the adjacent business premises and from traffic on London Road. There is no evidence to suggest the site is subject to excessive noise from any source. I heard that the business premises are light industrial and

I saw that it is their backs which face the appeal site. Similarly whilst London Road is busy and carries traffic from the south into the town centre, it has not been suggested that the noise climate on the appeal site is in anyway different to that of many similar situations. I shall not therefore impose suggested condition 20.

18. In their representations the appellants suggested that ground stabilisation measures could be provided in the back gardens of houses 19 to 23 but as there is no evidence to suggest that the ground will become unstable I consider this condition to be unnecessary.

Conclusions

19. For the reasons given above and having regard to all other matters raised, I conclude that the proposal, subject to suitable conditions, would meet the objectives of both development plan and national policy guidance and that the appeal should be allowed.

Formal Decision

20. In exercise of the powers transferred to me, I allow the appeal and grant planning permission for a residential development comprising 17 1 and 2 bedroom apartments (3 storey), 1 1 bedroom house (2.5 storey) and 5 3 bedroom semi/terraced houses on land off London Road/Hollands Road, Northwich in accordance with the terms of the application Ref. APP/2001/1506 dated 15 October 2001, and the plans numbered SHA1 – location plan, N001C – planning layout, N002 - plans/elevations plots 1 to 12, N002 - typical site sections, N003 - 1 and 2 bed flats plots 13 to 18 and 3333 - 3 bed dwelling type Hampton, subject to the following conditions:

- 1) The development hereby permitted shall be begun before the expiration of five years from the date of this decision.
- 2) No development shall take place until samples of the materials to be used in the construction of the external surfaces of the residential units hereby permitted have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.
- 3) The rear and side elevation details together with the first and second floor layouts of units 1 to 12 hereby permitted shall be submitted to and approved in writing by the local planning authority before development commences. Development shall be carried out in accordance with the approved details.
- 4) All finished ground floor levels shall be set at 15.6m AOD minimum.
- 5) No development shall take place until a scheme for the landscaping of the site has been submitted to and approved in writing by the local planning authority. The scheme shall include details of hard landscaping; planting plans; written specifications of cultivation; tree, shrub, hedge and grass establishment; schedules of plants noting species, plant sizes and proposed number/densities; and a programme of implementation.
- 6) All hard and soft landscaping shall be completed in accordance with the approved scheme. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the local planning authority gives written consent to any variation.

- 7) No development shall take place until there has been submitted to and approved in writing by the local planning authority details of the positions, design, materials and type of boundary treatment to be erected. The boundary treatment shall be completed in accordance with a timetable approved by the local planning authority as part of the submitted details. Development shall be carried out in accordance with the approved details and thereafter retained.
- 8) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that Order with or without modification), no development as may otherwise be permitted by virtue of Classes A, B, C and E of Part 1 of Schedule 2 of the said order shall be carried out within the curtilage of the 1 bedroom house fronting London Road.
- 9) Details of any floodlighting/security lighting shall be submitted to and approved in writing by the local planning authority before the development commences. Development shall be carried out in accordance with the approved details.
- 10) Before the development hereby permitted commences on the site, a survey to investigate potential contamination of the former abattoir site shall be undertaken and the results provided to the local planning authority. The survey shall be taken at such points and to such depth as the local planning authority may stipulate. A scheme for decontamination of the site shall be submitted to and approved by the local planning authority in writing and the scheme as approved shall be fully implemented and completed before any residential unit hereby permitted is first occupied.
- 11) Development shall not begin until details of the construction of the access to the site from Hollands Road have been approved in writing by the local planning authority. None of the residential units shall be occupied until that access has been constructed in accordance with the approved details.
- 12) Details of wheel wash facilities within the site shall be submitted to the local planning authority. The approved facilities shall be maintained and utilised throughout the course of demolition and construction works.
- 13) Details of the surfacing of the parking and circulation areas shall be submitted to and approved by the local planning authority. The details shall be implemented in accordance with a timetable approved by the local planning authority as part of the details.
- 14) The houses on plots 19 to 23 shall not be occupied until the agreed flood storage works scheme as set out in the T A Millard Partnership report of November 2001 (2392/02/JPC/11-01/144) have been constructed and completed in accordance with the details contained in that report.

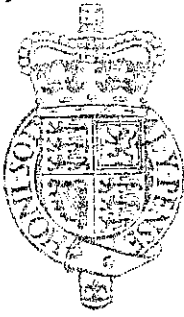
Information

21. A separate note is attached setting out the circumstances in which the validity of this decision may be challenged by making an application to the High Court.
22. This decision does not convey any approval or consent that may be required under any enactment, by-law, order or regulation other than section 57 of the Town and Country Planning Act 1990.

23. An applicant for any approval required by a condition attached to this permission has a statutory right of appeal to the Secretary of State if that approval is refused or granted conditionally or if the authority fails to give notice of its decision within the prescribed period.
24. Attention is drawn to the enclosed note relating to the requirements of the Chronically Sick and Disabled Persons Act 1970, as amended.



INSPECTOR



Costs Decision

Hearing held on 8 October 2002

Site visit made on 8 October 2002

by **D L Burrows** DipTP MRTPI

an Inspector appointed by the First Secretary of State

The Planning Inspectorate
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Date

05 OCT 2002

Costs application in relation to Appeal Ref: APP/L0635/A/02/1089431

Land off London Road/Hollands Road, Northwich

- The application is made under the Town and Country Planning Act 1990, sections 78, 322 and Schedule 6 and the Local Government Act 1972, section 250(5).
- The application is made by J S Bloor (Wilmslow) Ltd for a full award of costs against Vale Royal Borough Council.
- The hearing was in connection with an appeal against the refusal of planning permission for a residential development comprising 17 1 and 2 bedroom apartments (3 storey), 1 1 bedroom house (2.5 storey) and 5 3 bedroom semi/terraced houses

Summary of Decision: The application is allowed in the terms set out below in the Formal Decision and Costs Order.

The Submissions for J S Bloor (Wilmslow) Ltd

1. The application is made under Circular 8/93 annex 3 para 9 because the Council has failed to provide evidence to substantiate the reasons for refusal. The key issue is the relationship of the Council with the Environment Agency on whom they have relied. However the Circular says that a council needs to be happy that any advice it is given is justified and properly thought out. Although there have been discussions throughout the application process with the Council and the Environment Agency, the Agency have never justified their comments. Even before their objections were withdrawn they were late with their comments and in preparing for the appeal the appellants had only assertion and no substantive case to rebut.
2. It is not sufficient for the Council to say it was following the advice of the Agency. If it had wished the Agency could have directed refusal, but it did not do so. The Council could have obtained a second opinion or challenged the Agency's view. In relying on the Agency the Council ignored the comprehensive report produced by the appellants in January 2002. A report which refers to the infrastructure, the presence of which eventually caused the Agency to withdraw its objection.
3. This is not a matter which should have gone to appeal. The application for housing on land to the south went to the same April meeting that refused the appellants' application. The other application however was deferred for further discussions regarding river erosion and the committee resolved to approve the proposal subject to a section 106 agreement.
4. When the Agency withdrew their objection in August, the appellants were invited by the Council to withdraw the appeal and go through the planning process again. However there was no resolution from the committee that they were minded to allow the appeal, no certainty that the new application would be approved and no indication of how long a decision would take. A further application would also have involved the appellants in

paying another planning fee. In all the circumstances it was considered speedier for the appeal process to continue.

5. The Council has acted unreasonably throughout the appeal process by its unquestioning reliance on the Environment Agency's unsubstantiated views and the full costs of the appeal are sought.

The Response by Vale Royal Borough Council

6. The Council has behaved in a reasonable and proper manner in considering the application. It has requested no unnecessary information. All the information which the appellants have provided was necessary in connection with the application as well as the appeal. At the start of its consideration of the appeal application the Council asked if the previous reasons for refusal for a similar development on the site had been overcome, but that was not the case. There were outstanding highways and flooding issues.
7. The Environment Agency is a statutory consultee who told the Council that there was an outstanding issue in respect of river erosion. The Council and the Agency had talks with the appellants in order to try and overcome the difficulties. All along the line the Agency maintained its position that there was a significant risk, but was not able to back its view up with technical evidence because its statement was returned by the Inspectorate due to its late submission. The Council has been reliant on the Agency and took their advice on board. It was not in a position to override the concerns of the Agency. The Council did however take account of Section 54A of the Act and the local plan housing allocation, but on balance decided the arguments in favour of development overcame the objections identified by the Agency.
8. As soon as the Council was aware of the changed views of the Environment Agency they related the position to the appellants, suggested they withdraw the appeal and indicated that the Council would not object to a new application. The application on the site to the south was not determined at the April meeting, but deferred because not all consultation responses had been received. Negotiations on that site continued throughout the summer and it was only at the September meeting that the committee resolved to approve the proposal subject to the completion of a Section 106 agreement.
9. The Council has acted reasonably and properly in determining the application and an award of costs is not justified.

Conclusions

10. I have considered this application for costs in the light of Circular 8/93 and all the relevant circumstances. This advises that, irrespective of the outcome of the appeal, costs may only be awarded against a party who has behaved unreasonably and thereby caused another party to incur or waste expense unnecessarily.
11. Circular 8/93 makes it clear that when they take technical advice from statutory consultees, planning authorities are expected to thoroughly consider that advice. Para 9 of Annex 3 says that *before determining a planning application...it is always the planning authority's sole responsibility to ensure their decision is based on a complete understanding of the advice*. Para 10 goes on to say that in any appeal proceedings the authority is expected to produce and/or co-ordinate the provision of evidence and in any subsequent costs

application it is the relevance of the reasoning which prompted the authority to accept a consultees advice that matters.

12. In this particular case there has been no attempt to justify the reasons for refusal by the Council in either their written statement produced before the hearing or verbally at the hearing itself. It has relied solely on the opinion of the Agency who did not produce any explanation to justify the assertions in its correspondence prior to the application being determined. I therefore consider the Council has acted unreasonably in that it produced no evidence to substantiate its reasons for refusal.
13. I now turn to the unnecessary costs incurred by the appellants. As soon as it became aware of the changed circumstances and the withdrawal of the objection by the Environment Agency the Council speedily informed the appellants that it would no longer defend its reasons for refusals. I appreciate the appellants' reasons for wishing to continue with the appeal. However para 15 of Annex 2 to the Circular says that a planning authority should minimise the risk of an award of costs against them by notifying the appellants if they conclude on re-examination of their case that their reasons for refusal cannot be substantiated. An appellant would not then be able to show that he had incurred unnecessary expense in preparing to contest the reasons after he had been notified of the planning authority's change of stance.
14. This leads me to the conclusion that the unreasonable behaviour of the Council led to unnecessary costs for the appellant company only up to the Council's notification in August that it would no longer defend its reasons for refusal. It was, after that date, the appellant's choice to continue with the appeal proceedings by way of a hearing. There were other options open to the appellant after that time. In reaching this conclusion I have considered the Council's assertion that preparing for the appeal did not involve any additional work for the appellants, but it is evident from reading the representations that additional work was carried out and reports were prepared by the appellants in order to pursue the appeal and refute the Council's reasons for refusal.
15. I find that unreasonable behaviour resulting in unnecessary expense, as described in Circular 8/93, has been demonstrated. I therefore conclude that a partial award of costs is justified.

Formal Decision and Costs Order

16. In exercise of my powers under section 250(5) of the Local Government Act 1972 and Schedule 6 of the Town and Country Planning Act 1990, and all other powers enabling me in that behalf, I HEREBY ORDER that Vale Royal Borough Council shall pay to J S Bloor (Wilmslow) Ltd, the costs of the appeal proceedings, limited to those costs incurred up to August 2002 when the Council notified the appellant company of its change of stance, such costs to be assessed in the Supreme Court Costs Office if not agreed. The proceedings concerned an appeal under section 78 of the Town and Country Planning Act 1990 against the refusal of planning permission for a residential development comprising 17 1 and 2 bedroom apartments (3 storey), 1 1 bedroom house (2.5 storey) and 5 3 bedroom semi/terraced houses on land off London Road/Hollands Road, Northwich at Wyvern House, The Drummer, Winsford.

17. The applicant is now invited to submit to Vale Royal Borough Council, to whom a copy of this decision has been sent, details of those costs with a view to reaching agreement as to the amount. In the event that the parties cannot agree on the amount, a copy of the guidance note on how to apply for a detailed assessment by the Supreme Court Costs Office is enclosed.

Information

18. A separate note is attached setting out the circumstances in which the validity of this decision may be challenged by making an application to the High Court.


INSPECTOR

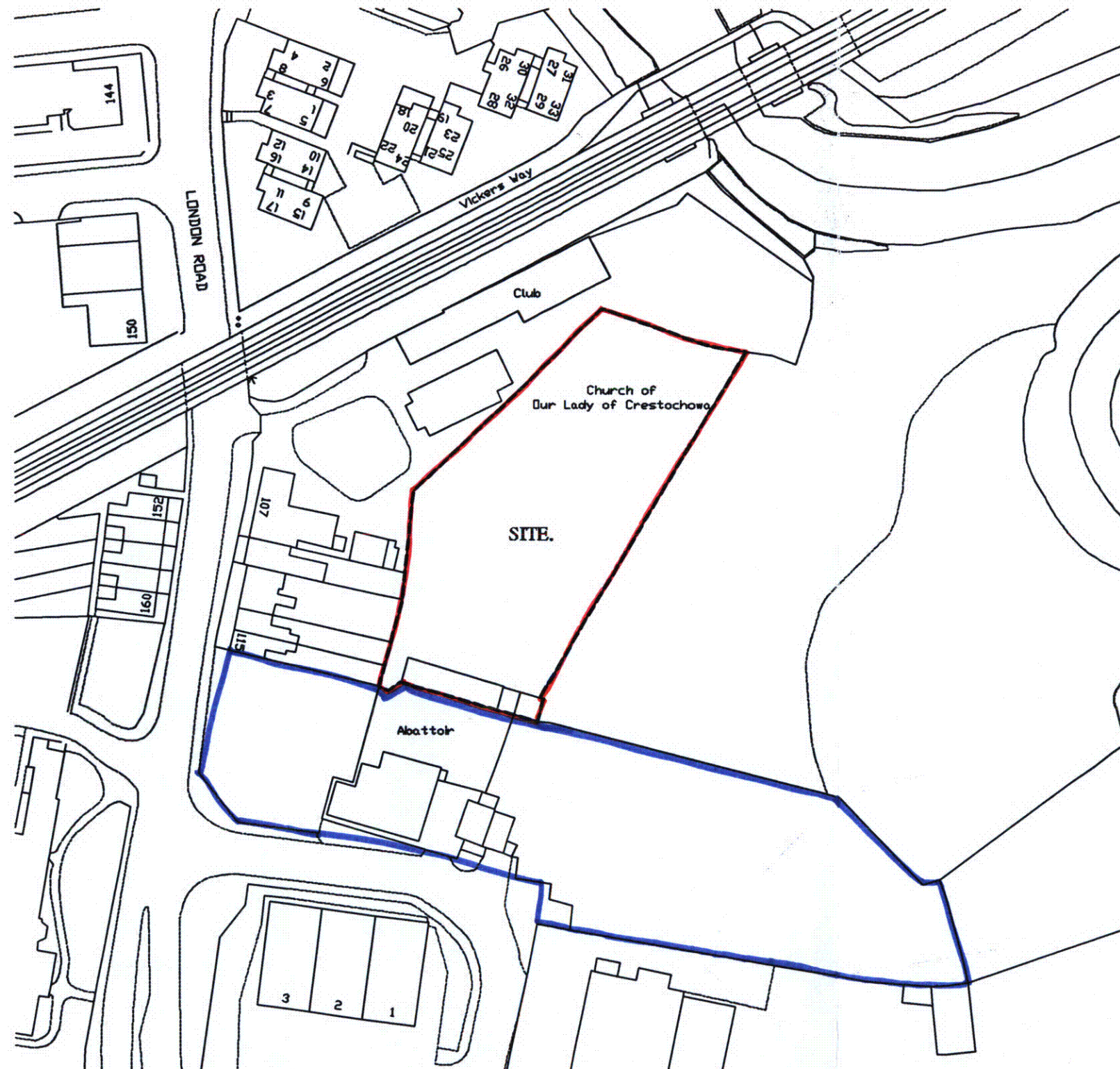
APPENDIX B

LOCATION PLAN & FLOOD RISK MEASURES

APP /2004/ 0313

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This is the plan referred to in the attached 'Decision Notice'



THE ROYAL
 BOROUGH COUNCIL
 SOCIAL AND COMMUNITY SVS
 18 FEB 2004
 Circular

REVISIONS	
JOB	LAND OFF HOLLANDS ROAD, NORTHWICH,
DRAWING	LOCATION PLAN
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DATE:	30:01:04
DRAWN:	A.EDGE

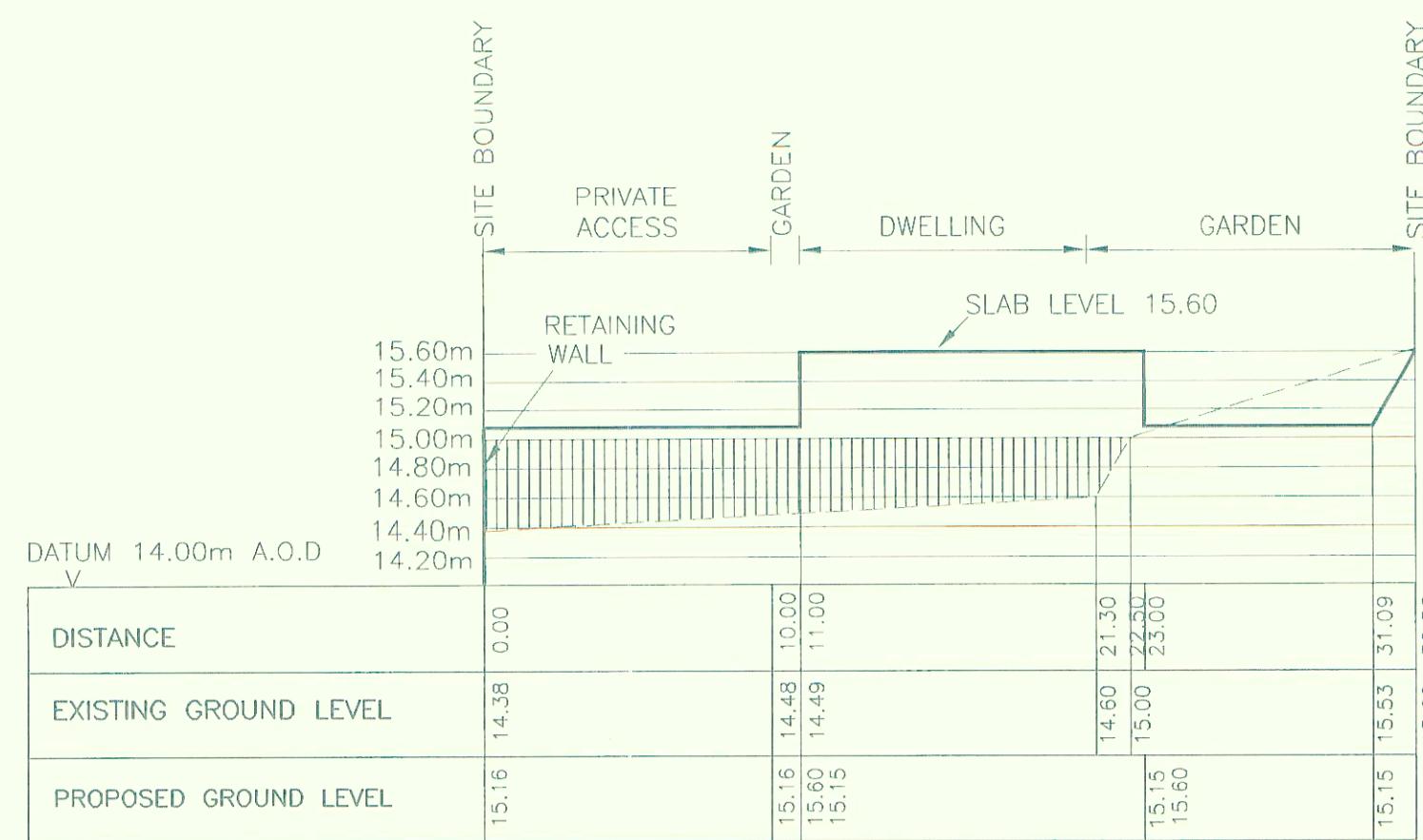
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BLOOR HOMES

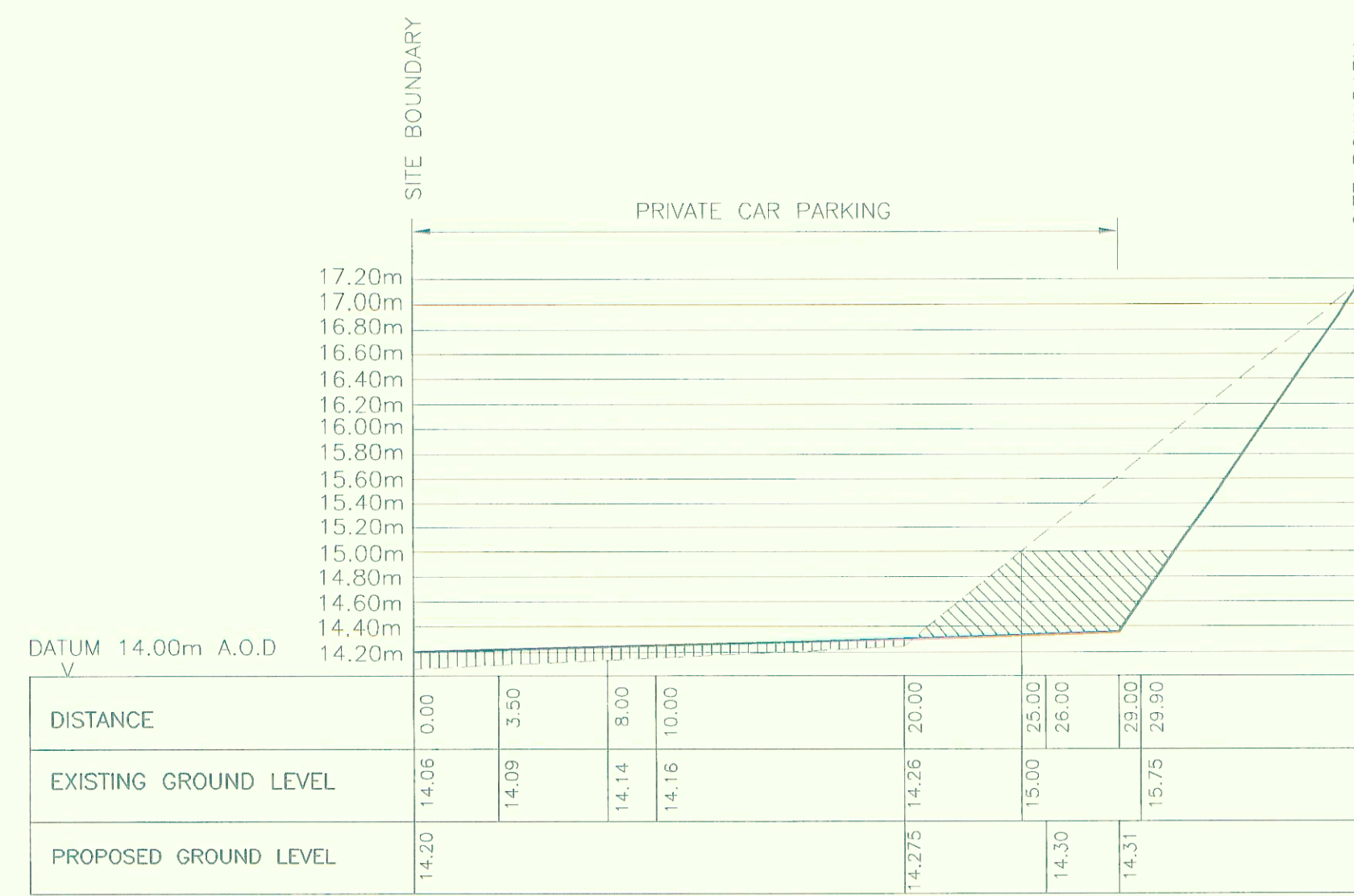
JS BLOOR (SERVICES) LIMITED,
 ASHBY ROAD, MEASHAM, SWADLINCOTE,
 DERBYSHIRE DE12 7JP
 TELEPHONE 01530 270100 FACSIMILE 01530 271440

DRAWING No: C035_03

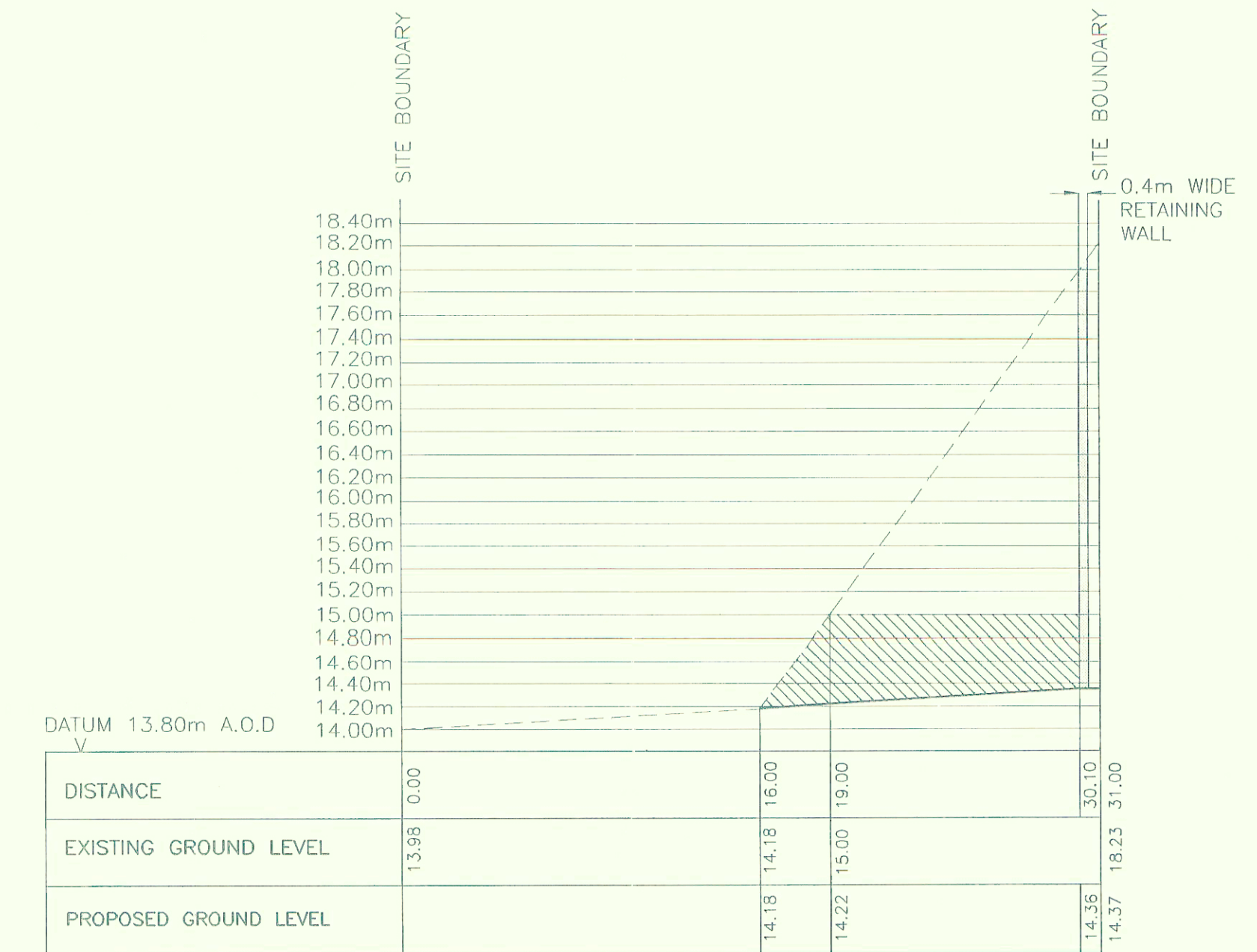
HOLLANDS ROAD . NORTHWICH.



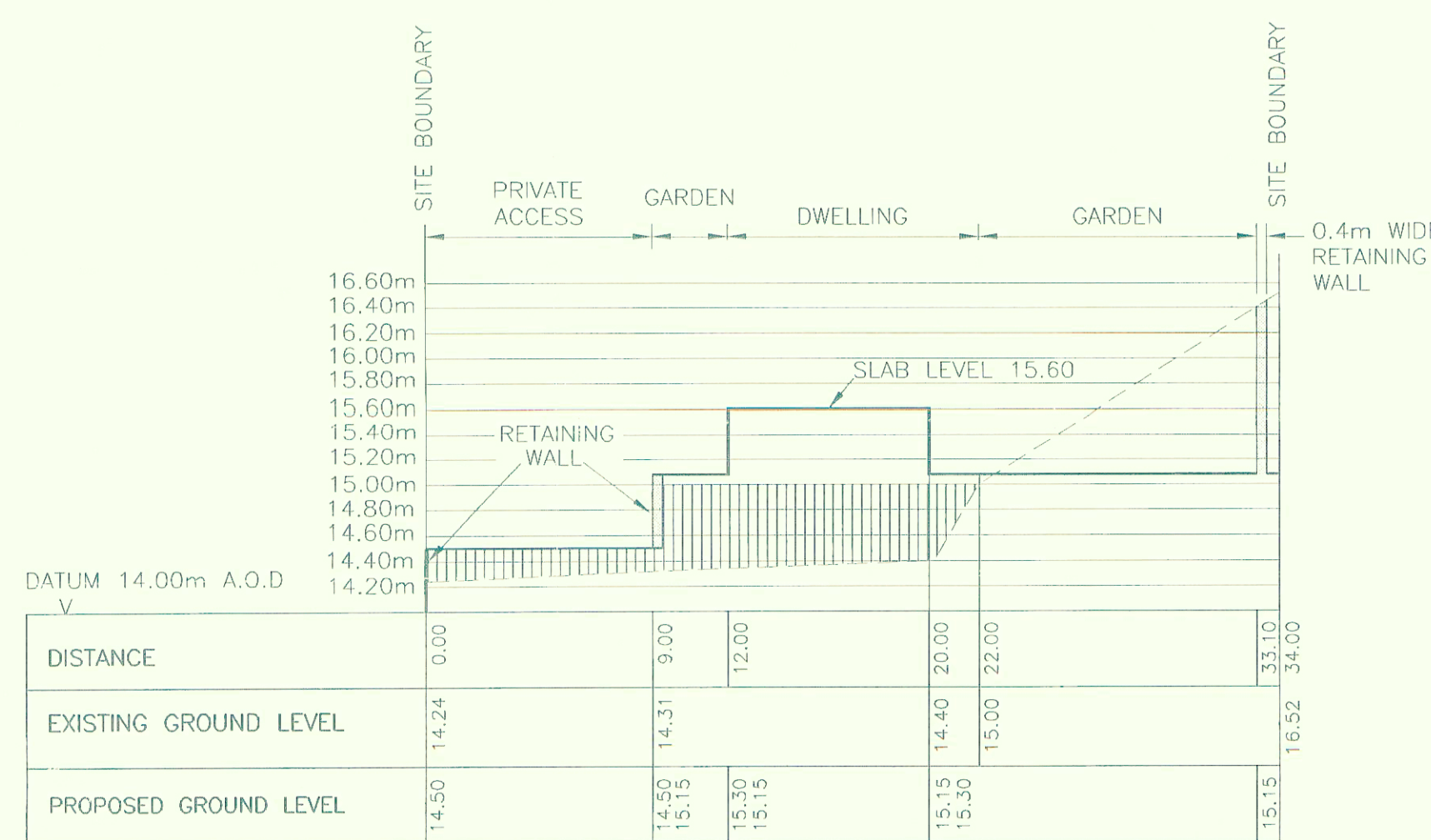
CROSS SECTION AREA J-J



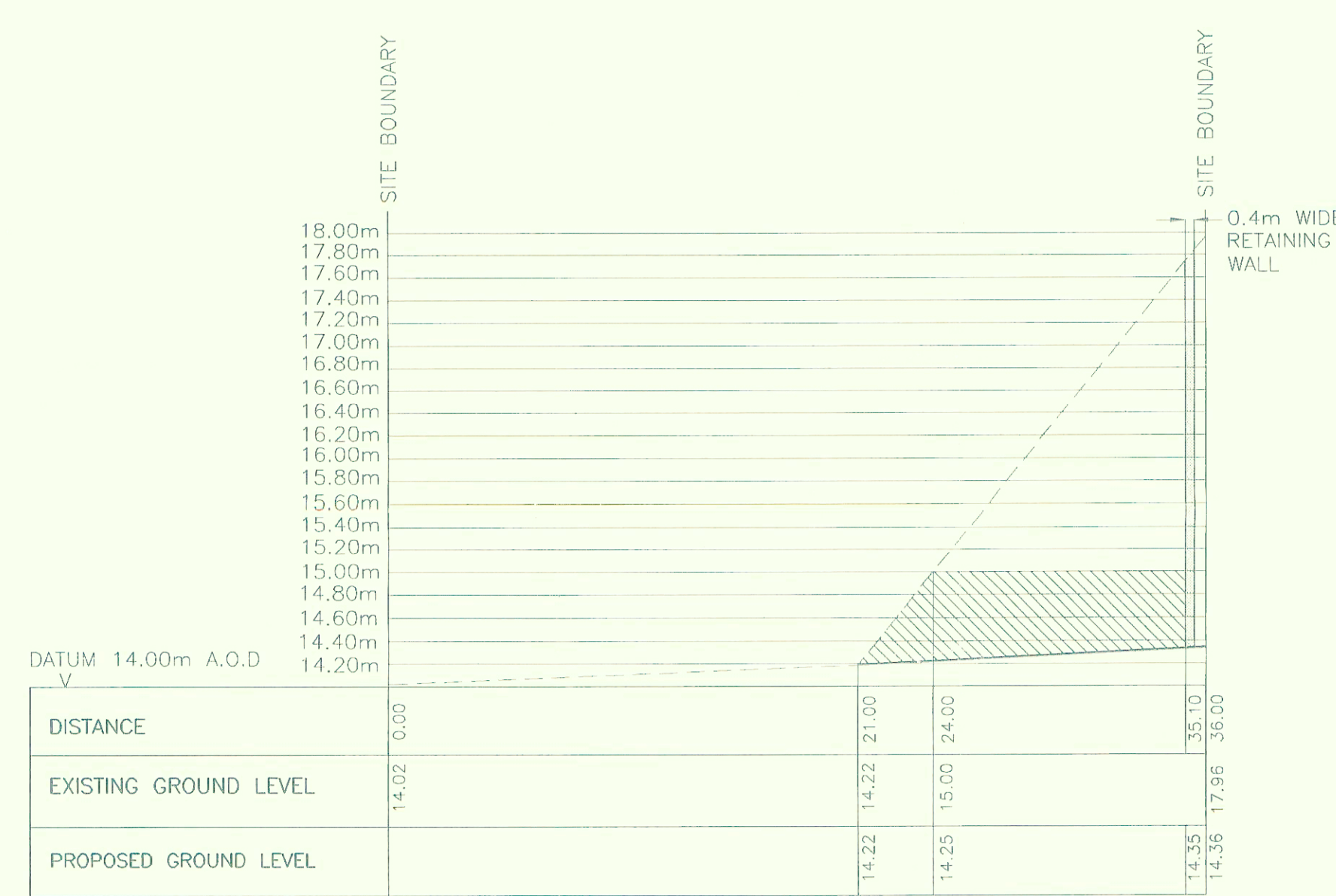
CROSS SECTION AREA M-M



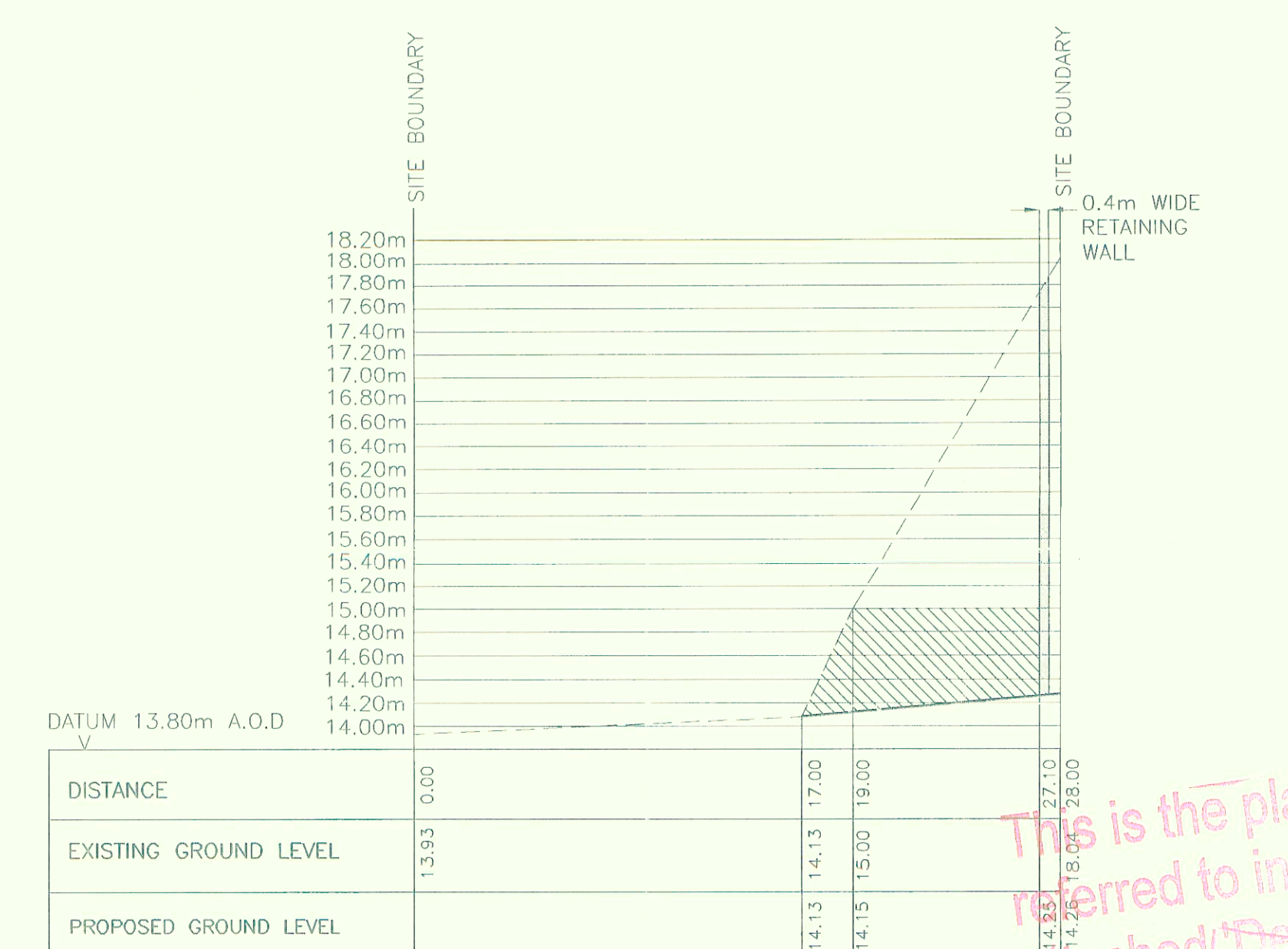
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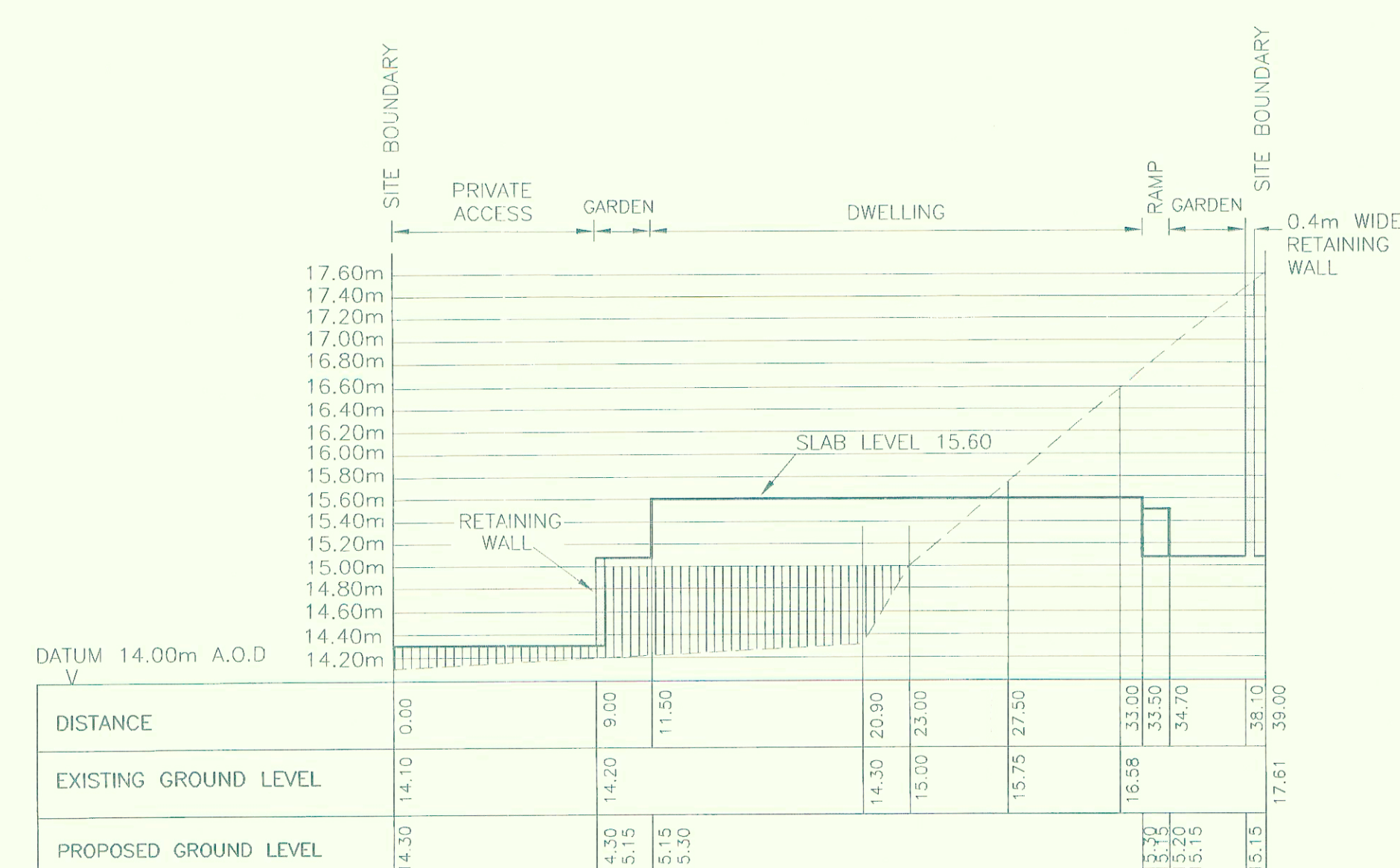
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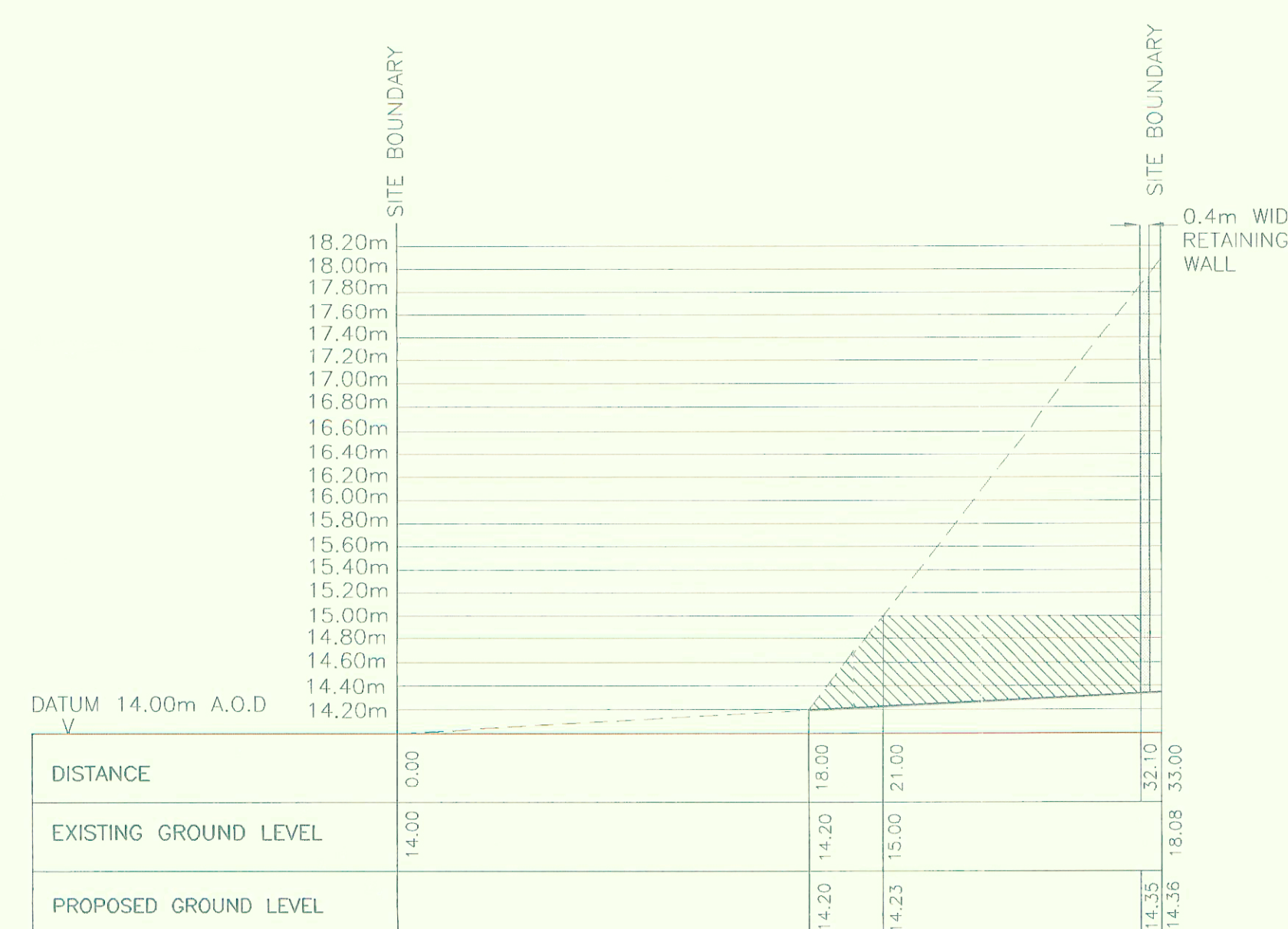
CROSS SECTION AREA N-N



CROSS SECTION AREA Q-Q



CROSS SECTION AREA L-L



CROSS SECTION AREA O-O

- NOTES
- 1 ALL LEVELS ARE IN METRES AND RELATE TO ORDNANCE SURVEY DATUM.
 - 2 ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
 - 3 FLOOD LEVEL IS 15.0m AOD.

KEY

- FLOOD VOLUME GAIN
- FLOOD VOLUME LOSS
- EXISTING GROUND LEVEL
- PROPOSED GROUND LEVEL

This is the plan referred to in the attached Decision Notice

13 MAY 2024

A	FLOOR SLAB LEVEL AMENDED	SB	JPC	04.05.04
REV	AMENDMENT DETAILS	DRAWN	APPROVED	DATE

PROJECT: PROPOSED DEVELOPMENT, HOLLANDS ROAD, NORTHWICH

DESIGNED AND DRAWN BY: JS SB

APPROVED BY: MJD

DRAWING STATUS: DATE: 2.2.04

CAD REFERENCE FILE NUMBER: 2392_02_013A

DRAWING NUMBER: 2392/02/013

REVISION: A

CLIENT: BLOOR HOMES

T A Millard East Angles Limited
Briantonia House 45-53 Prince of Wales Road Norwich NR11DL
telephone 01603 610916 facsimile 01603 620531 email norwich@tamillard.co.uk
www.tamillard.co.uk






Scale: 1:250H
1:50V

Millard Consulting Engineers

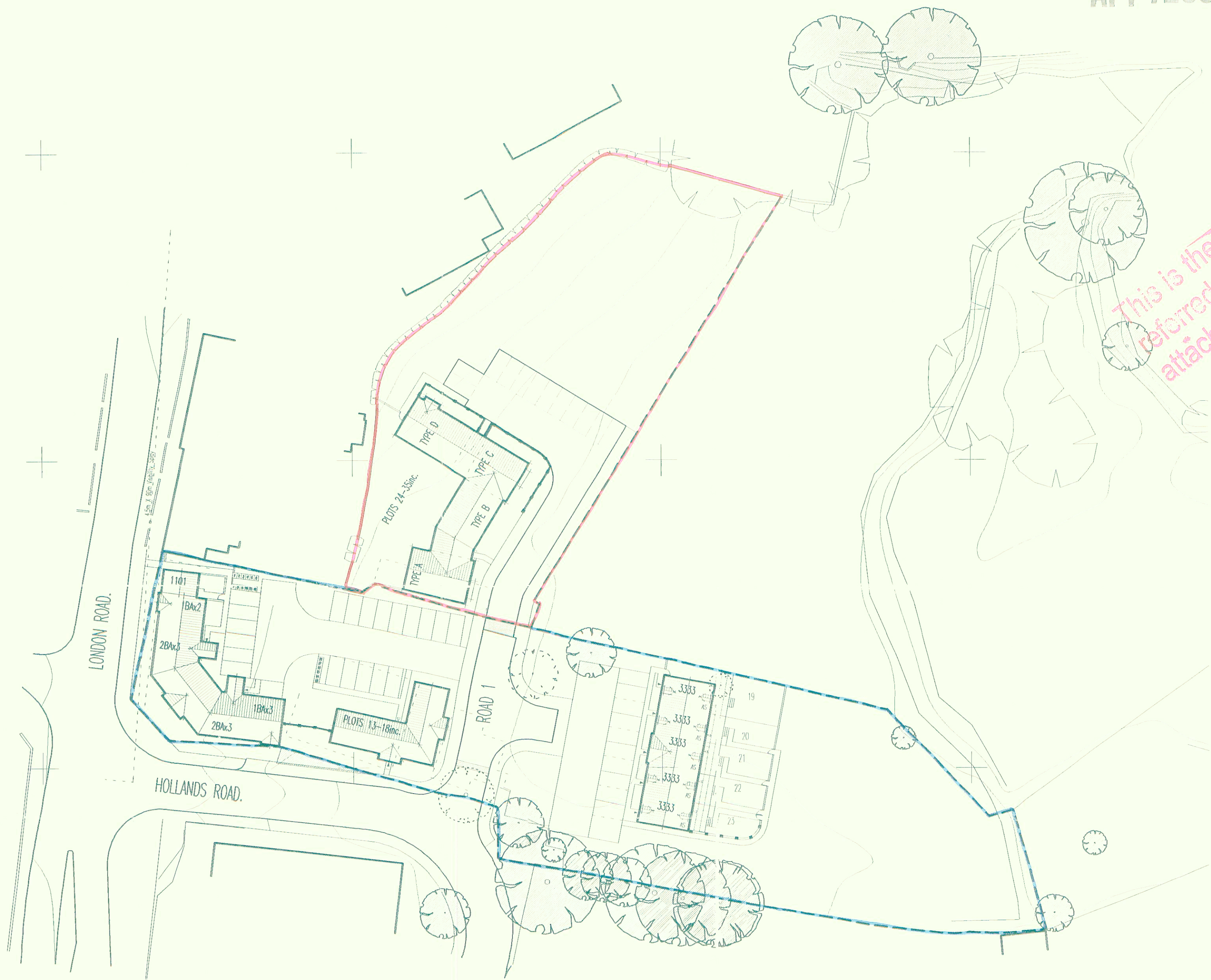
TYPE C	568 FT ²	3 No.
1 BED APARTMENTS		3 No.
TYPE A	771 FT ²	3 No.
TYPE B	678 FT ²	3 No.
TYPE D	771 FT ²	3 No.
2 BED APARTMENTS		9 No.
SITE TOTAL		12No.

LEGEND

PARKING ALLOCATIONS -
2 BED APARTMENTS 100%

-  1.8m HIGH SCREEN BRICK WALL
-  1.8m HIGH TIMBER PANEL FENCE
-  DENOTES EXISTING TREES TO BE REMOVED
-  DENOTES EXISTING TREES TO BE RETAINED
-  DENOTES TREE AND SHRUB PLANTING SHOWN INDICATIVE. SEE LANDSCAPE LAYOUT FOR FURTHER DETAILS

This is the plan referred to in the attached Decision Notice



REVISIONS

JOB	LAND OFF HOLLANDS ROAD, NORTHWICH, PHASE 2.
DRAWING	PLANNING LAYOUT

SCALE:	1 : 500
DATE:	29:01:04
DRAWN:	A.EDGE

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J.S BLOOR (SERVICES) LIMITED,
ASHBY ROAD, MEASHAM, SWADLINCOTE,
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TELEPHONE 01530 270100 FACSIMILE 01530 271440

VALE ROYAL
BOROUGH COUNCIL
SOCIAL AND COMMUNITY SVS
18 FEB 2004

DRAWING No: C035_01

HOLLANDS ROAD , NORTHWICH.



north west elevation



south west elevation

This is the plan referred to in the attached planning notice



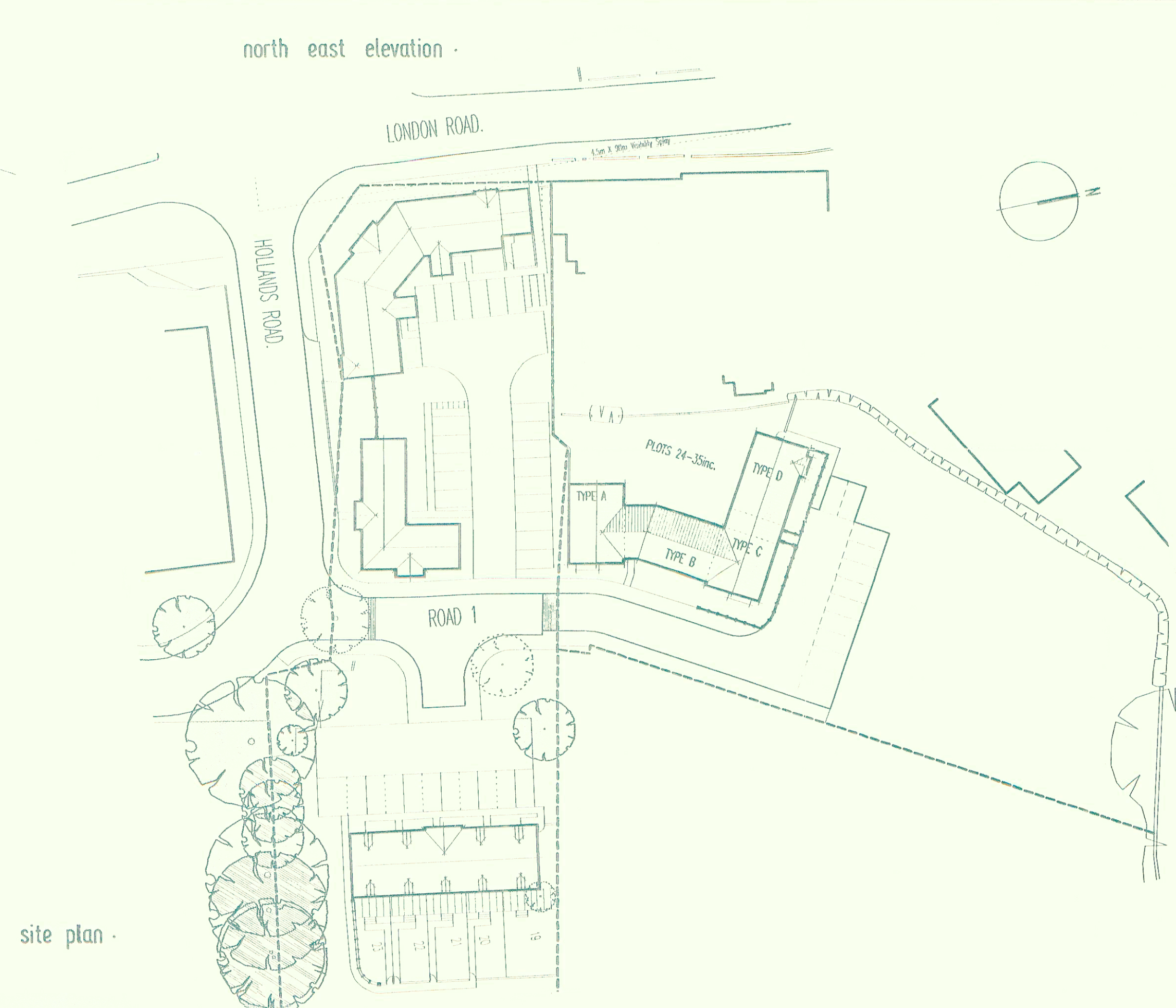
south east elevation



north east elevation



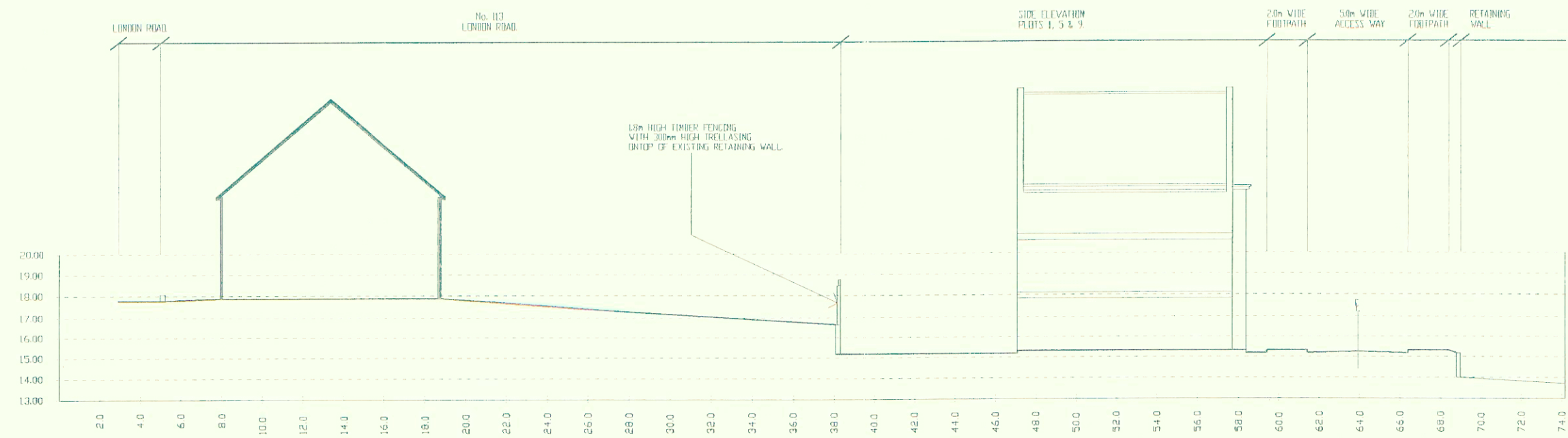
ground floor plan - first and second floors similar



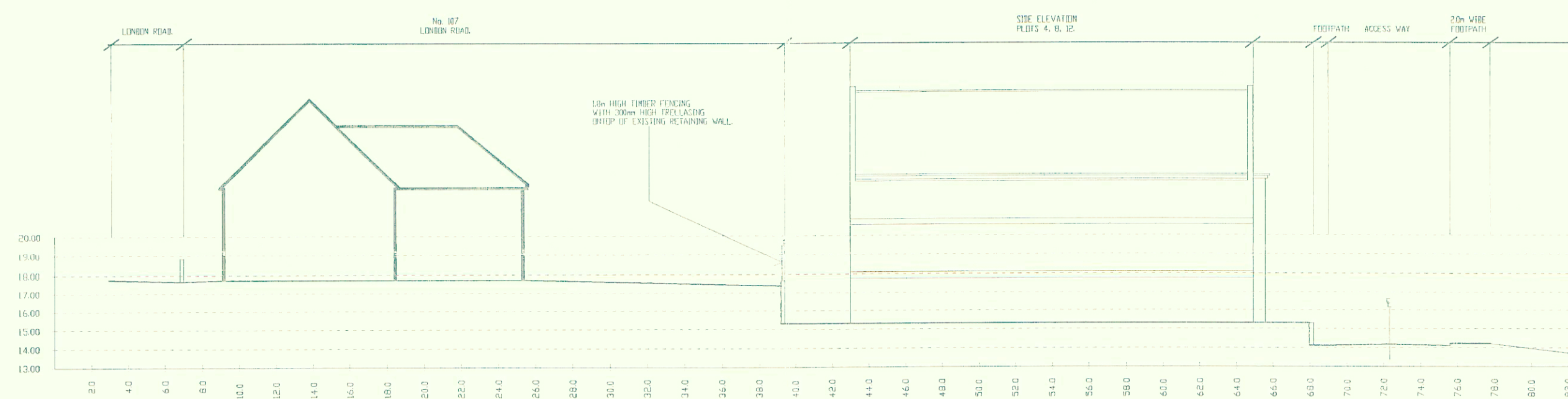
site plan

REVISIONS JOB LAND OFF HOLLANDS ROAD, NORTHWICH	
DRAWING APARTMENT PLANNING DRAWING PLOTS 24-35inc.	
SCALE: 1 : 100 / 1 : 500	DATE: 28-01-04
DRAWN: A.EDGE/A.BROOKES	
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DRAWING No:	C035_02

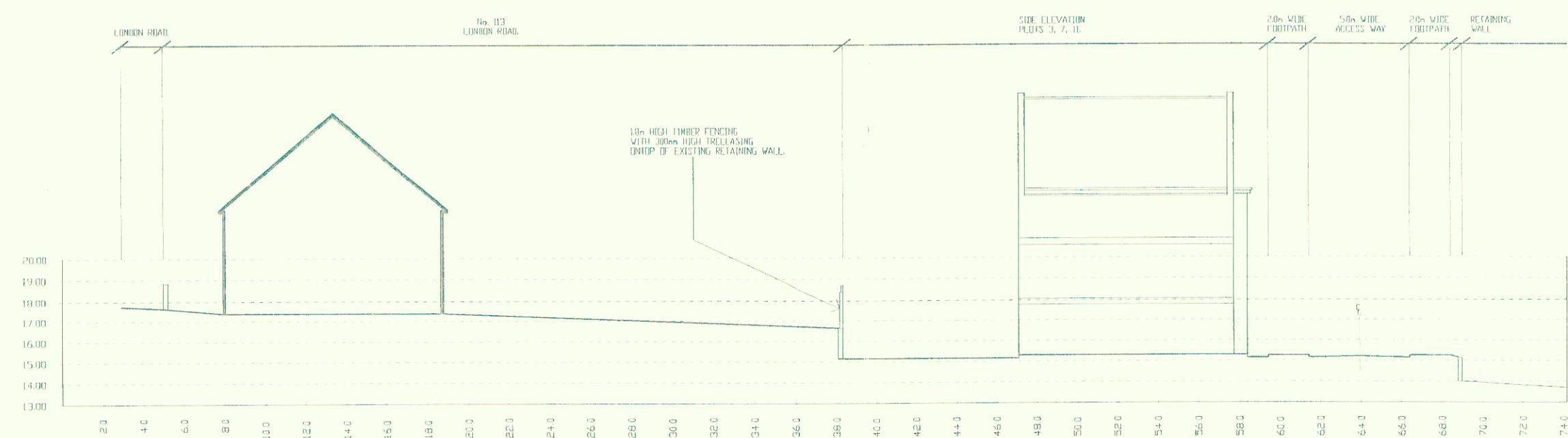
This is the plan referred to in the attached 'Decision Notice'



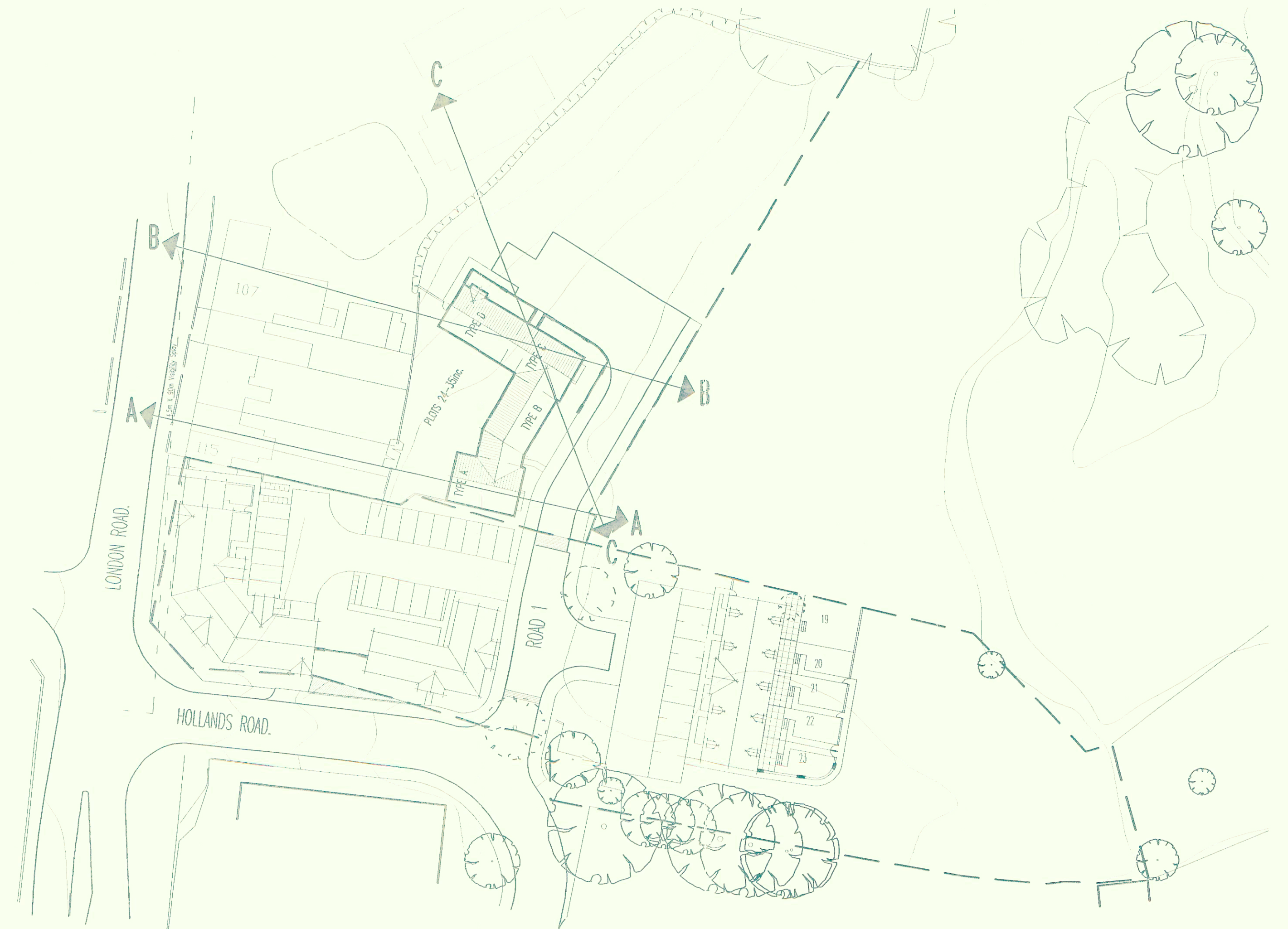
SECTION A-A



SECTION B-B



SECTION C-C



BOROUGH COUNCIL	
18 FEB 2004	
REVISIONS	
JOB	LAND OFF HOLLANDS ROAD, NORTHWICH, PHASE 2
DRAWING	SITE SECTIONS
SCALE:	1 : 500 / 1 : 250
DATE:	05-02-04
DRAWN:	A.EDGE

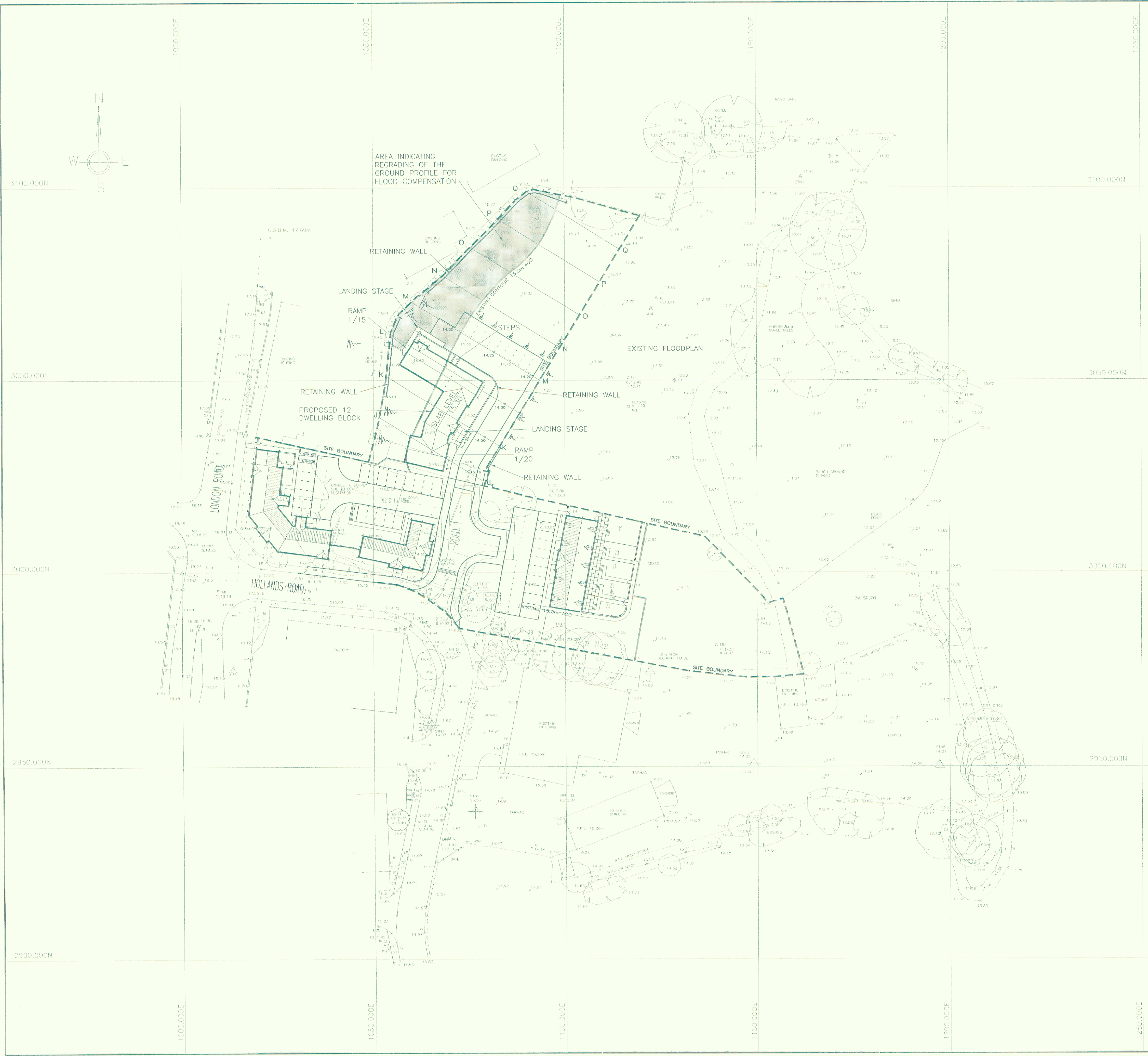
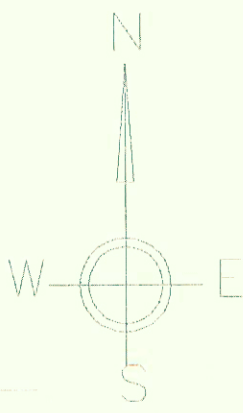
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BLOOR HOMES

JS BLOOR (SERVICES) LIMITED,
 ASHBY ROAD, MEASHAM, SWADLINCOTE,
 DERBYSHIRE DE12 7JP
 TELEPHONE 01530 270100 FACSIMILE 01530 271440

DRAWING No: C035_04

HOLLANDS ROAD, NORTHWICH.



This is the plan referred to in the attached Decision Notice

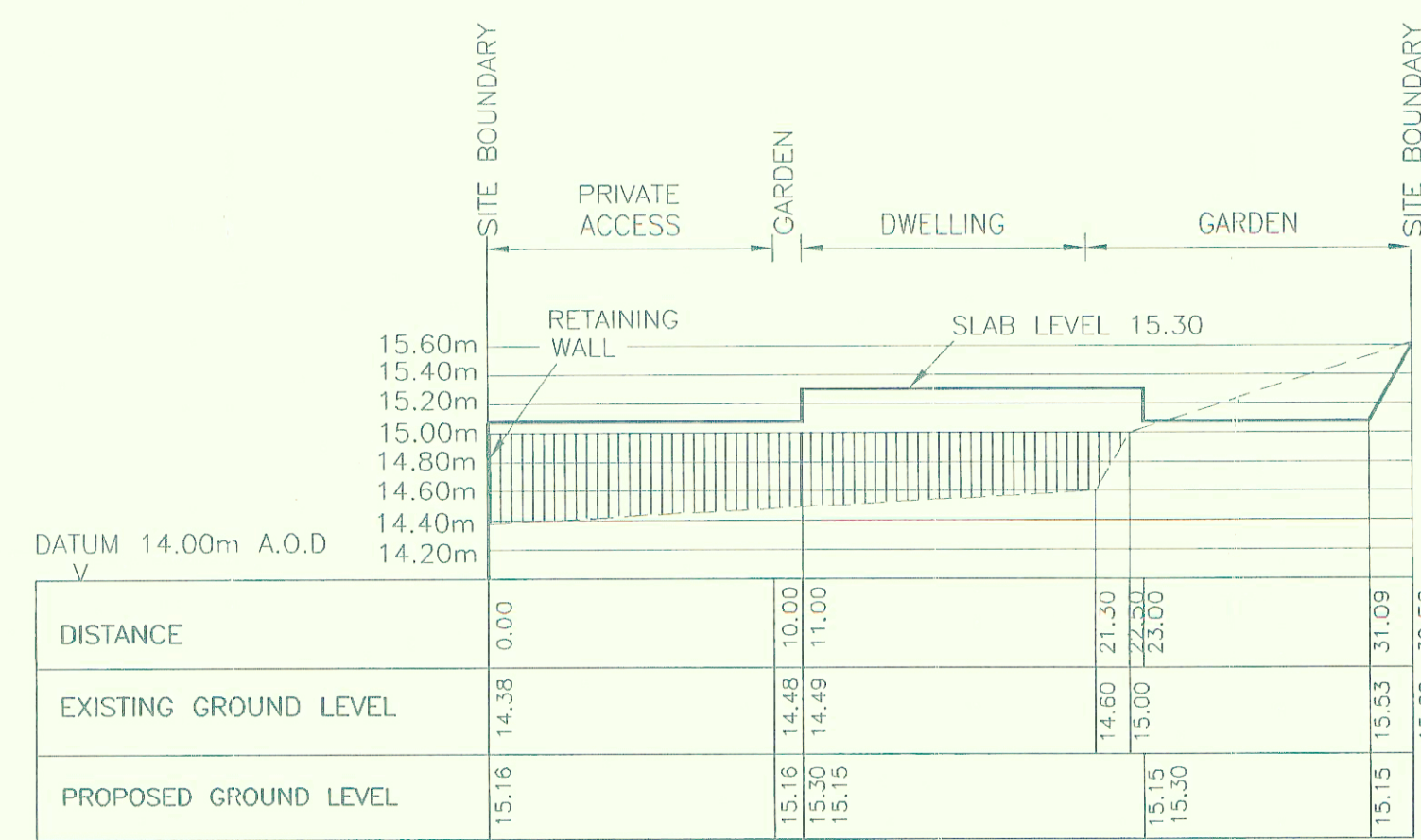
NOTES

1. ALL LEVELS ARE IN METRES ABOVE AOD
2. LOCAL GRID USED AND ORIENTATED TO MAGNETIC NORTH
3. ACCESS ROAD INTO THE NEW BLOCK OF 12 DWELLINGS IS TO BE PRIVATE. THE GRADIENT OF THE NEW ROAD IS TO BE 1 IN 22.

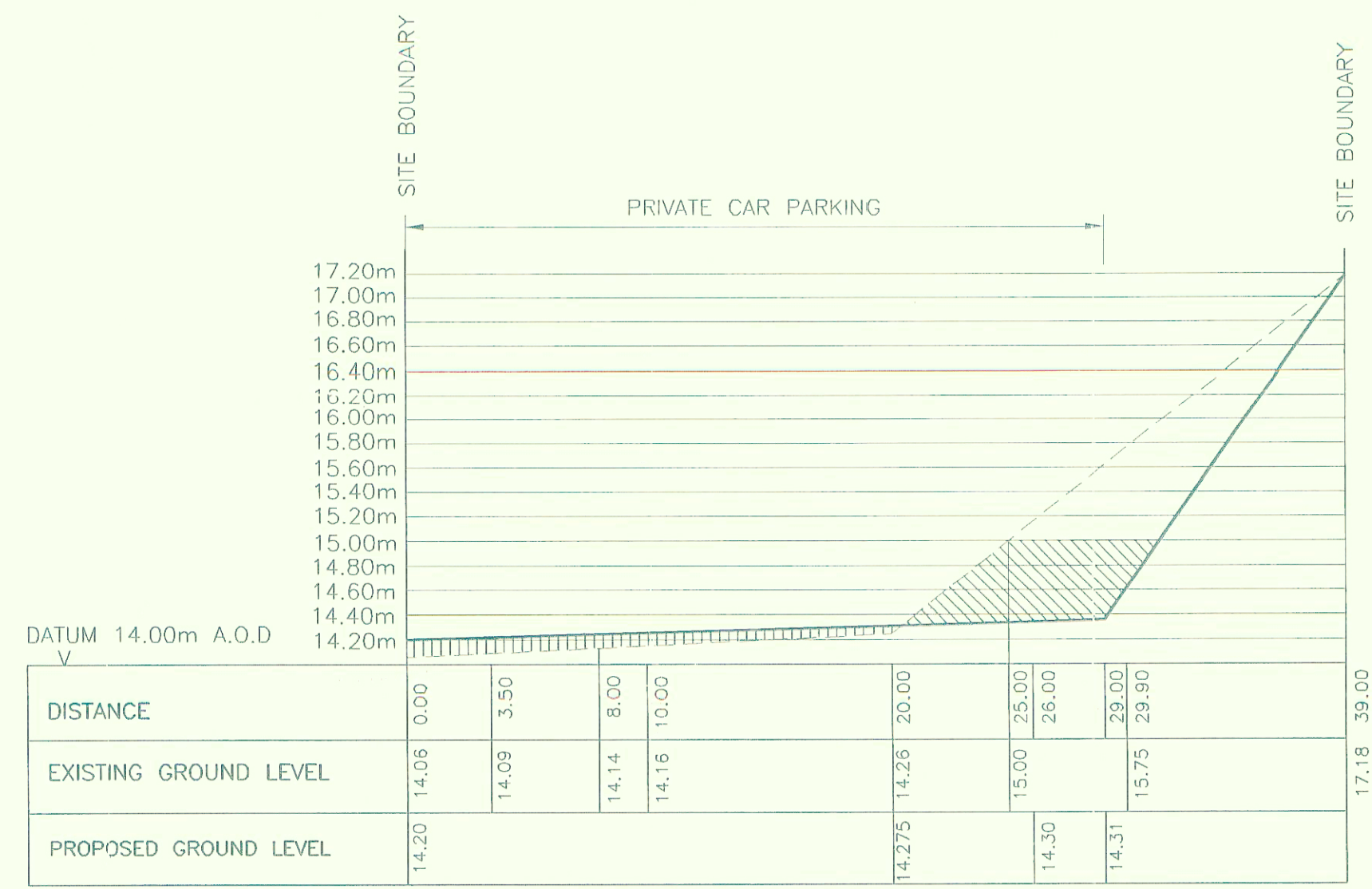
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REV	AMENDMENT DETAILS	DRAWN	APPROVED	DATE

PROJECT PROPOSED DEVELOPMENT HOLLANDS ROAD, NORTHWICH	DESIGNED AND DRAWN BY JS SB	SCALE 1:500	 Millard Consulting Engineers <small>1 A Millard East Anglia Limited Brimingham House 45-53 Prince of Wales Road Norwich NR11EL telephone 01603 610916 facsimile 01603 620631 email norwich@tamillard.co.uk offices at Fordingbridge, Southampton and Nuneaton</small>
DRAWING TITLE GENERAL ARRANGEMENT OF HOUSING EXTENSION	APPROVED BY MJD	CHECKED BY MJD	
CLIENT BLOOM HOMES	DRAWING STATUS 2392_02_012_	DATE 30.01.04	
CAD REFERENCE FILE NUMBER 2392_02_012_	DRAWING NUMBER 2392/02/012	REVISION -	

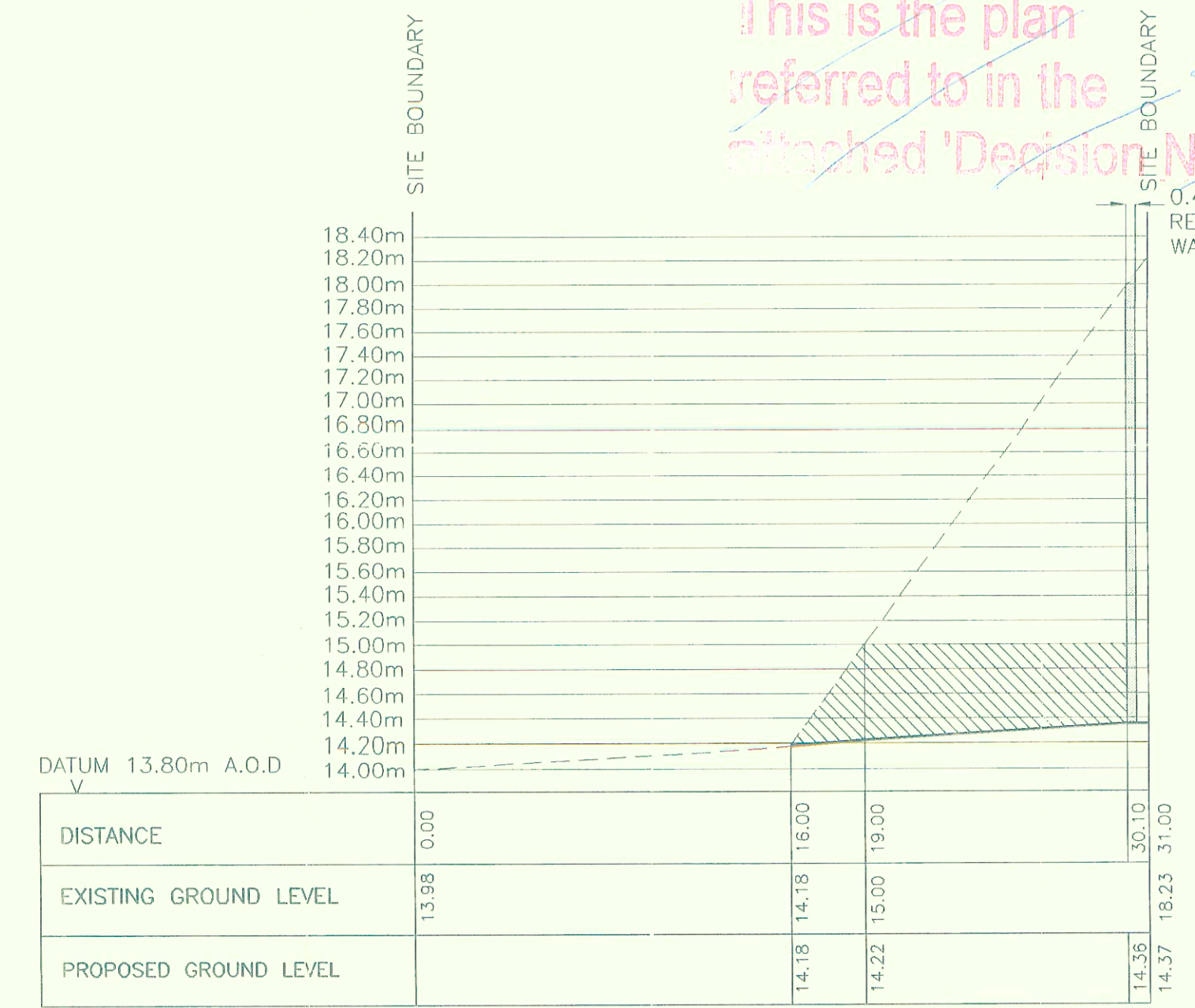
This is the plan referred to in the attached 'Decision Notice' See Rev A.



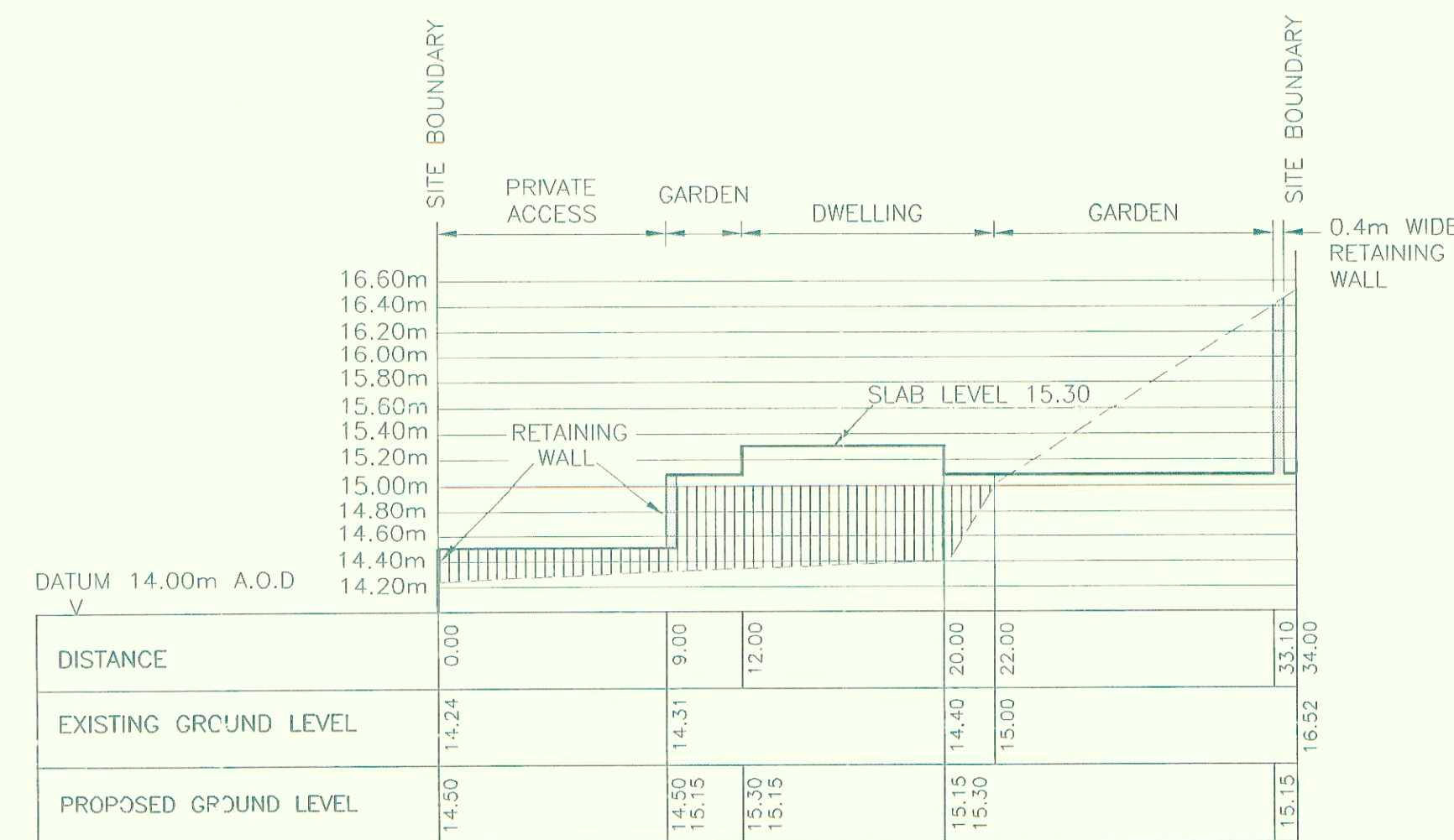
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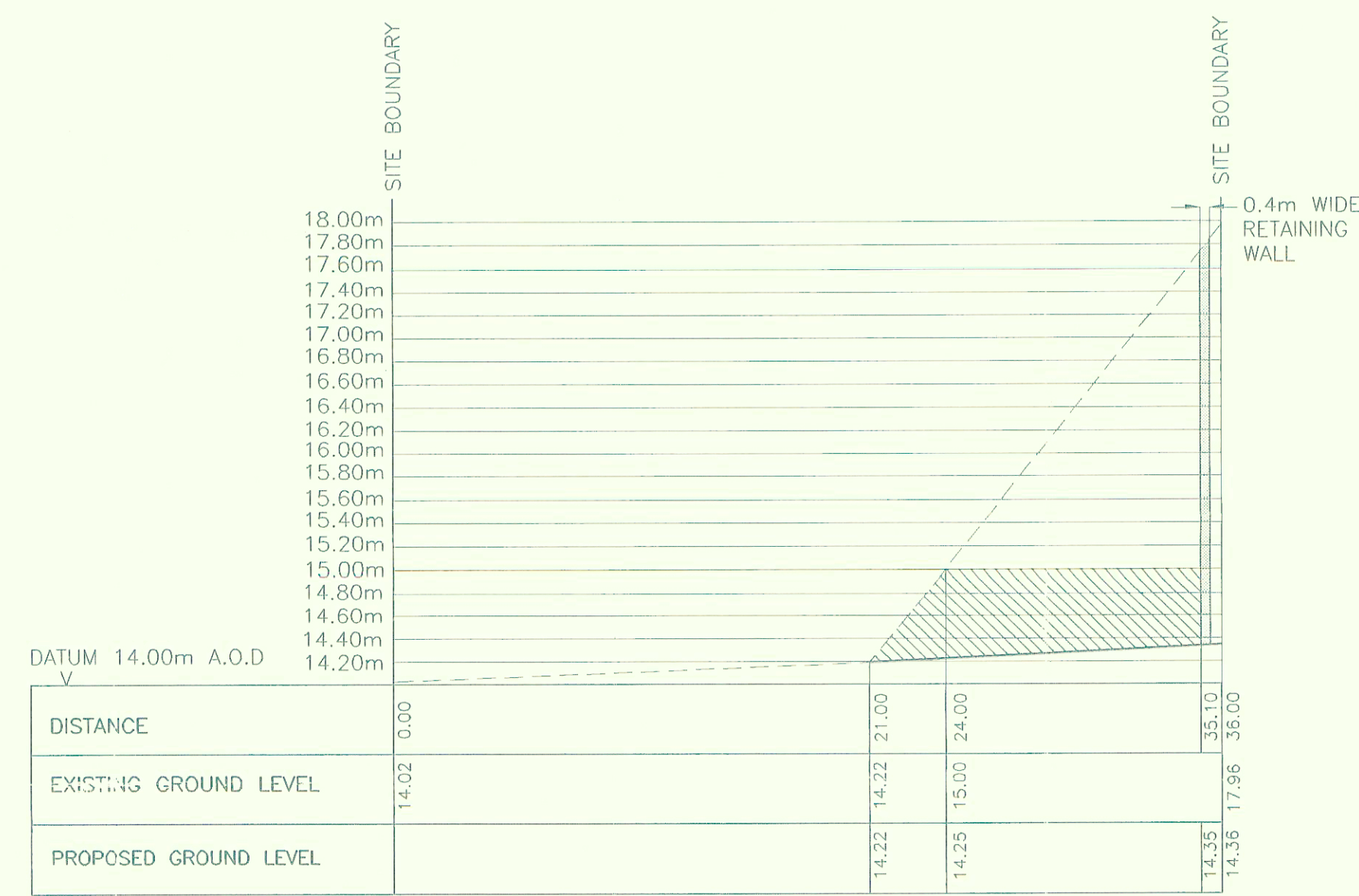
CROSS SECTION AREA M-M



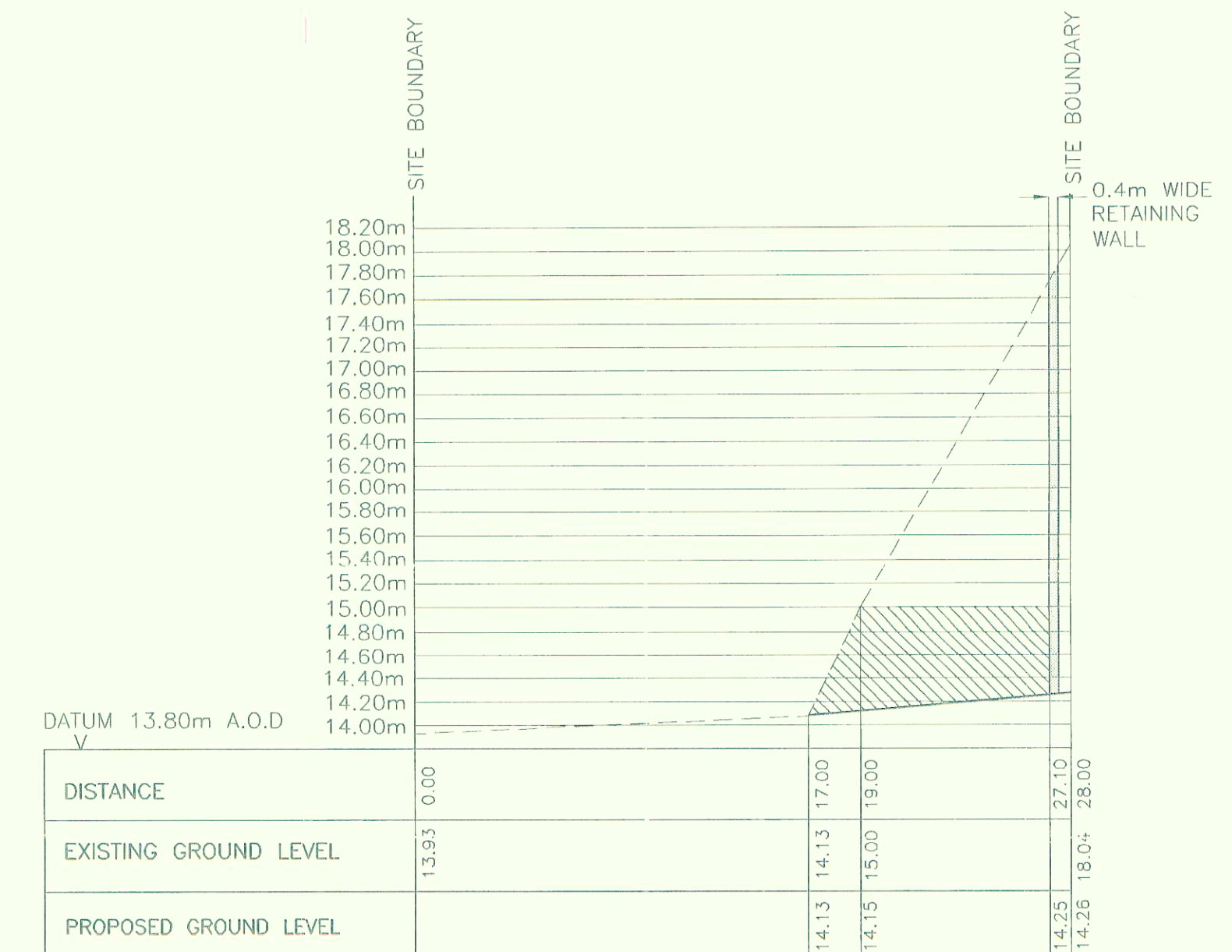
CROSS SECTION AREA P-P



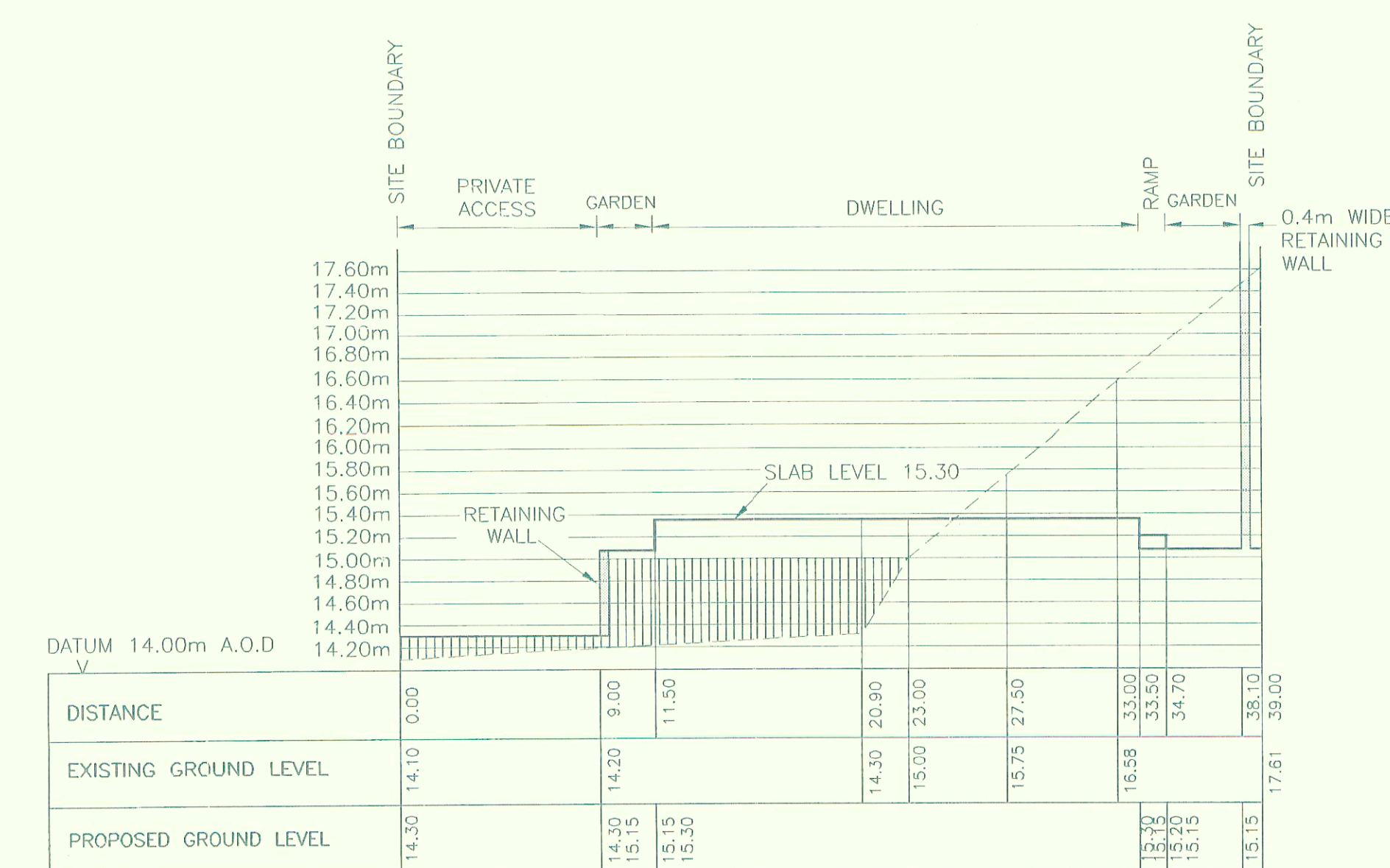
CROSS SECTION AREA K-K



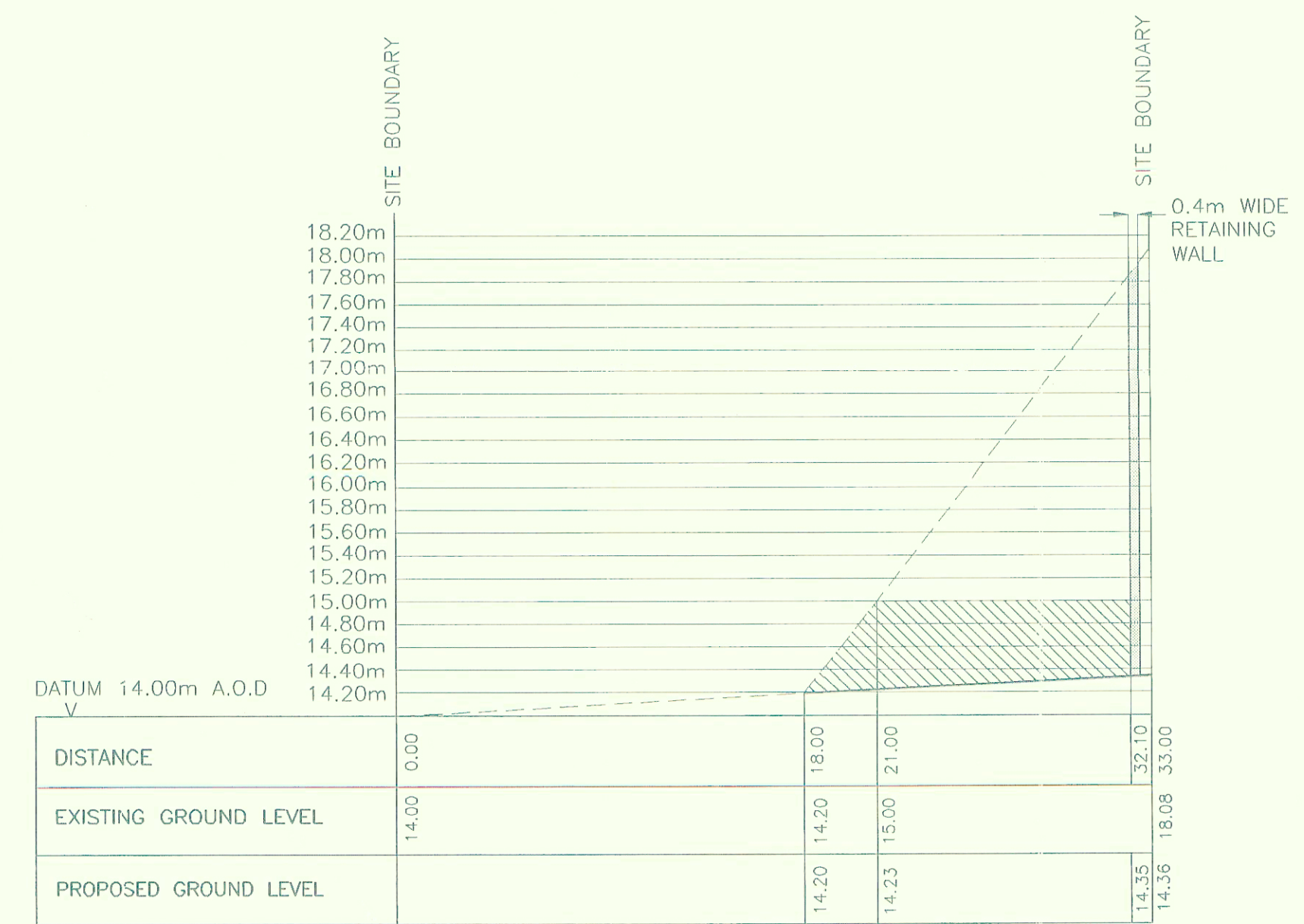
CROSS SECTION AREA N-N



CROSS SECTION AREA Q-Q



CROSS SECTION AREA L-L



CROSS SECTION AREA O-O

NOTES

- 1 ALL LEVELS ARE IN METRES AND RELATE TO ORDNANCE SURVEY DATUM.
- 2 ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
- 3 FLOOD LEVEL IS 15.0m A.O.D.

KEY

- FLOOD VOLUME GAIN
- FLOOD VOLUME LOSS
- EXISTING GROUND LEVEL
- PROPOSED GROUND LEVEL

REV	AMENDMENT DETAILS	DRAWN	APPROVED	DATE

PROJECT PROPOSED DEVELOPMENT, HOLLANDS ROAD, NORTHWICH	DESIGNED AND DRAWN BY JS SB	SCALE 1:250H 1:50V	
DRAWING TITLE CROSS SECTIONS TO SHOW PROVISION OF ADDITIONAL FLOOD VOLUME	APPROVED BY MJD	CHECKED BY MJD	
CLIENT BLOOR HOMES	DRAWING NUMBER 2392/02/013	DATE 2.2.04	REVISION
T A Millard East Anglia Limited Britannia House 45-53 Prince of Wales Road Norwich NR11B Telephone 01603 610916 facsimile 01603 670531 email norwich@tamillard.co.uk www.tamillard.co.uk			offices at Perth, Ipswich, Sevenoaks and Nuneaton

APPENDIX C

FLOOD RISK FILE NOTES

Webbs Court – Flood Risk File Note

Project:	Webbs Court
For:	ADS Plan Ltd
Status:	Issued
Date:	13 th November 2014
Author:	Daniel Alstead BSc (Hons), MSc, MCIWEM – Senior Hydrologist
Reviewer:	Matt Travis, BSc (Hons), MSc, MCIWEM, C.WEM, CEnv, CSci - Director

1. Introduction

1.1 Background

At the request of ADS Plan Ltd, a Flood Risk Assessment (FRA) has been instructed, in accordance with the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG ID: 7), for outline planning permission for a residential development located on land off Webb's Court, Northwich, Cheshire West and Chester, CW9 8RU. This will include an assessment of the surface water drainage requirements of the site.

1.2 Purpose of Report

At the time the FRA was instructed, a proposed layout had not been provided.

It is understood that the proposed layout first requires guidance related to the flood risk associated with the site. It is therefore the purpose of this Flood Risk File Note to provide flood risk guidance in order to develop a workable layout which the final FRA report can be tailored towards.

It is noted that a Flood Screening Report was prepared by Enzygo during March 2010. It is however noted that the Environment Agency consultation and data obtained as part of the March 2010 study is now outdated, and a request for updated data was made to the Environment Agency. This Flood Risk File Note is based on the new consultation and data provided by the Environment Agency, including flood mapping and modelled flood levels, which have changed since 2010.

2. Flood Risk

2.1 Flood Risk Summary

As part of the FRA desktop study, the Environment Agency and other relevant Water Authorities were consulted with regards to flood risk to the site. Furthermore, we have reviewed the

Environment Agency online mapping, Ordnance Survey mapping, the Cheshire and Chester West Council Strategic Flood Risk Assessment (SFRA) and Promap electronic flood mapping.

A full description of the flooding identified within the site from all sources, including mitigation measures will be outlined within the full FRA report. However, at this stage a summary of the initial flood risk sources and their mitigation have been included within Table 2.1 below.

Table 2.1. Probability and Consequences of all Sources of Flooding

Flooding Source	Potential Source	Probability	Consequence & Impact Without Mitigation	Consequence & Impact With Mitigation	Comment
Fluvial flooding	River Dane (Main River)	Low to High	Low to High	Low	Sequential Development of the site, produce a Flood Warning and Evacuation Plan (FWEP) in line with commentary from the Emergency Planner at the Local Authority.
Tidal flooding	None	Negligible	Negligible	Negligible	None
Flooding from rising / high groundwater	Aquifer	Low	Low	Negligible	No occupation of properties below ground level. Negligible impact with correct management (i.e. appropriated sized drainage system).
Overland flow flooding	Poor Permeability	Low	Low	Negligible	Negligible impact with correct management (i.e. appropriated sized drainage system).
Flooding from artificial drainage systems	Sewers	Low	Low	Negligible	Will not affect the site area.
Flooding due to infrastructure failure	None	Negligible	Negligible	Negligible	None

Key: Green - Negligible, Yellow - Low, Orange - Medium and Red - High; based on consequence and impact with mitigation from each flooding source.

Based on the above, the risk of fluvial (river) flooding from the River Dane is considered the primary source of flooding to the site, which has been discussed in further detail below.

Secondary flood sources identified within the site includes groundwater flooding. The BGS Groundwater Flooding Susceptibility Map indicates that the entirety of the site is located within an area considered to have a potential for groundwater flooding of property situated below ground level. As no below surface infrastructure and buildings are proposed for the site, the proposed development is not considered at risk of flooding from rising / high groundwater.

Whilst the site has been demonstrated as not being subject to flooding from overland flow, the proposed development will increase the impermeable area of the site (currently greenfield), and in turn increase surface water runoff. It is proposed that this source of flooding can however be mitigated to a low and acceptable level through the adoption of a surface water management strategy, which will be developed as part of the full FRA report.

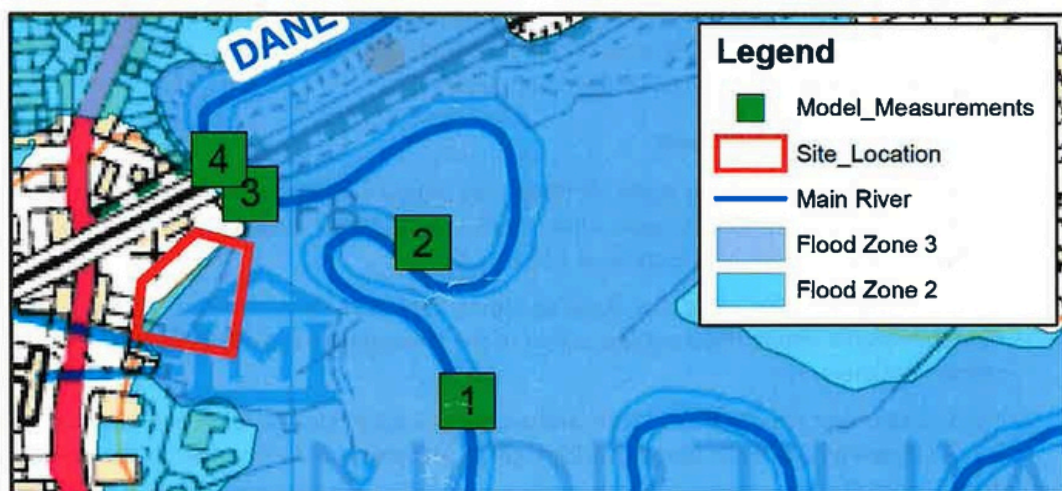
2.2 Fluvial Flooding

Based on a review of the Environment Agency Flood Map (see Figure 2.1 below) and Ordnance Survey Mapping, the River Dane (a 'Main River' maintained by the Environment Agency) flows in a northerly direction, approximately 25m to the north of the site at its closest point.

The Environment Agency flood map shows that the north-west extent of the site is located within Flood Zone 1; outside of the 1 in 1000 year (0.1% AEP) extent of fluvial flooding. This area of the site is considered to be at 'low' risk of fluvial flooding from the River Dane.

The eastern extent of the site is shown to be located within Flood Zone 3; within the 1 in 100 year (1% AEP) extent of fluvial flooding. This area of the site is considered to be at 'high' risk of fluvial flooding from the River Dane. A narrow band of Flood Zone 2 exists along the periphery of Flood Zone 3. Flood Zone 2 is located between the 1 in 100 year (<1% AEP) and 1 in 1000 year (>0.1% AEP) fluvial flooding extents. This area of the site is considered to be at 'medium' risk of fluvial flooding from the River Dane. It noted that the site entrance from Webbs Court is located within Flood Zones 2 and 3.

Figure 2.1. Environment Agency Detailed Flood Map (see Table 2.2 below for flood levels)



The detailed flood map is based on modelled flood levels derived from the Weaver and Dane 2011 study. The modelled flood depths for a number of node, across a range of return periods, are summarised in Table 2.2 below.

Table 2.2. River Dene Modelled Flood Levels (Defended, see map above)

Map Reference	Location / Description	Return Period / Flood Level (m AOD)	
		100yr (1% AEP)	1000yr (0.1% AEP)
1	Upstream extent of site	14.79	15.47
2	Downstream extent of site	14.77	15.43
3	Downstream from site (upstream side of railway crossing)	13.86	14.96
4	Downstream from site (downstream side of railway crossing)	13.78	14.91

It is common for flood mapping to be based on LiDAR data, which is considered less accurate than the detailed topographic survey, which has already been undertaken. As such, Enzygo applied the modelled flood levels from Node 1 to the detailed topographic survey, in order to more accurately map the flood extents within the site boundary. Node 1 was selected as the most applicable node as the flood levels at the upstream extent would be the most conservative figures compared to the lower flood levels at the downstream extent of the site.

The mapping exercise provided a similar flood outline, albeit a more refined outline when compared to the Environment Agency flood map. The area of the site located within Flood Zone 1 accounts for approximately 0.30 hectares (ha) (61%) of the overall 0.49 ha site. The remaining 0.19 ha (39%) of the site is located within Flood Zones 2 and 3. The mapping exercise also confirmed that the site entrance is located within Flood Zones 2 and 3 (see attached Modelled Flood Zone mapping).

It is noted that flood levels have not been provided for the 1 in 20 year (5% AEP) event, which would normally be used to differentiate Flood Zone 3a from 3b ('Functional Floodplain'), within the site boundary. Based on the close proximity to the River Dene, it is likely that a proportion of Flood Zone 3 within the site boundary could be Flood Zone 3b. Without additional model runs, the extent of Flood Zone 3b cannot be determined.

3 Flood Map and NPPF Guidance

A review of the Environment Agency's flood map indicates that the eastern extent of the site is located largely within Flood Zones 2 and 3 (medium to high risk). An area to the north-west extent of the site is located within Flood Zone 1 (low risk).

The mapping exercise using the detailed topographic survey and the modelled flood levels demonstrated a similar flood outline to that of the Environment Agency flood map, albeit a more refined outline.

The Environment Agency Flood Zones and acceptable development types are explained in Table 3.1. All development types are generally deemed acceptable in terms of flood risk in Flood Zone 1.

In PPG ID: 7, appropriate uses have been identified for the Flood Zones (see Table 3.2). Applying the Flood Risk Vulnerability Classification in Table 2 and 3 of the PPG ID: 7, the proposed residential development is classified as 'More Vulnerable'.

Based on the above, we would first recommend the sequential development of the site, whereby more vulnerable development (i.e. the building footprints) are limited to Flood Zone 1. Water Compatible used such a car parks and landscaped areas would be considered suitable within Flood Zones 2 and 3. A proposed layout will need to be provided to demonstrate the sequential development of the site within the FRA report.

Assuming that the site is sequential developed (as described above), then the Sequential Test should be passed, and the Exception Test would not need to be applied. Fluvial flood risk mitigation measures are described below in Section 4, which provides guidance for flood warning, and access/egress issues associated with the site.

Table 3.1. Environment Agency Flood Zones and Appropriate Land Use

Flood Zone	Probability	Explanation	Appropriate Land use
Zone 1	Low	Less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%)	All development types generally acceptable
Zone 2	Medium	Between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% 0.1%) in any year	Most development type are generally acceptable
Zone 3a	High	A 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year	Some development types not acceptable
Zone 3b	'Functional Floodplain'	Land where water has to be flow or be stored in times of flood. SFRAs should identify this zone (land which would flood with an annual probability of 1 in 20 (5%) or greater in any year or is designed to flood in an extreme (0.1% flood, or at another probability to be agreed between the LPA and the Environment Agency, including water conveyance routes)	Some development types not acceptable

Note: The Flood Zones are the current best information on the extent of the extreme flood from rivers or the sea that would occur without the presence of flood defences, because these can be breached, overtopped and may not be in existence for the lifetime of the development. Areas highlighted green are in indication of the Flood Zones present within the site boundary.

Table 3.2. Flood Risk Vulnerability and Flood Zone 'Compatibility' as identified in Table 3 of PPG ID: 7

Flood Risk Vulnerability classification (see Table 1 of PPG ID: 7 to the NPPF)	Essential Infrastructure	Water Compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Zone 1	Yes	Yes	Yes	Yes	Yes
Zone 2	Yes	Yes	Exception test required	Yes	Yes
Zone 3a	Exception test required	Yes	No	Exception test required	Yes
Zone 3b 'Functional Floodplain'	Exception test required	Yes	No	No	No

Key: Yes: Development is appropriate, No: Development should not be permitted. Areas highlighted green are based on the sequential development of the site.

4 Flood Risk Mitigation

4.1 Primary Flood Risk Sources

i. Sequential Development

Based on the above, the primary source of flooding to the site is fluvial (river) flooding, sourced from the River Dene. It is recommended that the site is sequential developed, whereby the more vulnerable footprints of the proposed residential development are limited to Flood Zone 1.

Water compatible elements of the proposed development, such as car parking and landscaped areas, would be considered suitable within Flood Zones 2 and 3.

ii. Floodplain Compensation

Assuming that the site is developed sequentially, whereby the developable area is limited to Flood Zone, there should not be a requirement for floodplain compensation. It is recommended that any sort of land raising activity within the area of the site within Flood Zone 2 and 3 is avoided, or where necessary kept to a negligible amount, so that floodplain compensation requirements can be avoided.

iii. Flood Warning

The site is not located within an area which receives flood warnings, however the Dene just downstream from the railway crossing (downstream) does receive flood warnings.

The published standard for the Environment Agency for advanced flood warning is 2 hours for fluvial flooding. It is recommended that the occupants should register contact details with the Environment Agency's Flood Warning Direct Service (Floodline 0845 988 1188) in order to receive flood warnings.

At this stage, it has been assumed that the site will be developed sequentially, whereby the building footprints of the residential development will be limited to Flood Zone 1, whereas

landscaped areas and car parking will be located within Flood Zone 2 and 3. The flood warning would therefore only apply to the car park and landscaped areas during potential flood event.

The landscaped areas and car park (considered water compatible development), which will serve the proposed residential development, which in itself should be signed up to the Flood Warning Direct Service. As such, it is believed that the car park can be evacuated prior to a flooding event, which is considered feasible given the published standard from the Environment Agency for advanced fluvial Flood Warning is 2 hours.

It may also be possible to provide a line of posts, with sufficient strength, appropriate spacing (i.e. 1.5m intervals) and height (approximate 1m), around the boundary of the car park, in order to prevent flood water from lifting up and moving vehicles outside of the site boundary, or into the watercourse itself, should any vehicles be present during a flood event.

Table 4.1. Summary of Flood Warnings

Flood Alert	Status	General Advice
 <p>FLOOD ALERT</p>	<p><i>Flood Alert Flooding is possible. Be prepared.</i></p> <p>The Environment Agency will issue a FLOOD ALERT status when flooding is possible, based upon weather and river/sea conditions. The Environment Agency aim to give 2 days' notice prior to a tidal FLOOD ALERT.</p>	<ul style="list-style-type: none"> • Be prepared to act on your flood plan. • Prepare a flood kit of essential items. • Monitor local water levels and the flood forecast on the Environment Agency website.
 <p>FLOOD WARNING</p>	<p><i>Flooding is expected. Immediate action required.</i></p> <p>The published standard from the Environment Agency for advanced fluvial FLOOD WARNING is 2 hours, or 1 day notice for a tidal FLOOD WARNING.</p>	<ul style="list-style-type: none"> • Move family, pets and valuables to a safe place. • Turn off gas, electricity and water supplies if safe to do so. • Put flood protection equipment in place.
 <p>SEVERE FLOOD WARNING</p>	<p><i>Warning severe flooding. Danger to life.</i></p> <p>The published standard from the Environment Agency for advanced fluvial FLOOD WARNING is 2 hours, or 1 day notice for a tidal FLOOD WARNING. A SEVERE FLOOD WARNING usually follows a FLOOD WARNING.</p>	<ul style="list-style-type: none"> • Stay in a safe place with a means of escape. • Be ready should you need to evacuate. • Co-operate with the emergency services. • Call 999 if you are in immediate danger.
<p>(NO SYMBOL)</p>	<p><i>No further flooding is currently expected in your area.</i></p>	<ul style="list-style-type: none"> • Be careful. Flood water may still be around for several days.

Flood Alert	Status	General Advice
WARNING NO LONGER IN FORCE		<ul style="list-style-type: none"> If you've been flooded, ring your insurance company as soon as possible.

iv. Access and Egress

The proposed access to the site is from Webbs Court (via Hollands Road), which is located along the southern boundary of the site.

As noted above, the site entrance is located within Flood Zones 2 and 3 (see attached Modelled Flood Zone Mapping), which will impact on access/egress from the developable area of the site (located within Flood Zone 1) to the area of Flood Zone 1 located to the west of the site.

Based on a comparison of the 1 in 1000 year modelled flood level (15.47m AOD), and the topographic survey, at the lowest point within the site access (14.54m AOD), the maximum flood depth would be up to approximately 0.93m, which would not be passable by vehicle, and would restrict access by emergency services. It is understood that the proposed development will be for residential units, which will require access/egress for residents and emergency services 24 hours a day.

As an option, a raised access route (ideally with ramped entrance and exit) could be developed as an access route between the site and the Hollands Road junction with the A533 (located to the west of the site/within Flood Zone 1). This would allow pedestrian access for the short length of the site access which falls within the flood zone. It is recommended that the access should be set above the 1 in 1000 year modelled flood level (15.47m AOD). It is further recommended that the raised access route should allow for a void beneath the structure, in order to reduce the loss of floodplain to a negligible amount, thus removing the requirement for floodplain compensation. The feasibility of this type of access would need to be investigated further.

At this stage it is the understanding that the site will operate with site access from Webbs Court. It may be worth discussing potential 'emergency access only' with the land owner to the west of the site (via Manora Road), which would allow vehicle access for emergency services/staff, when a flood event is occurring, which also limits the site would access to Flood Zone 1. This emergency access could be managed by a barrier system, but would require access through third party land.

Based on the above, access/egress from the site has presented itself as a problem when considering the development of the site. The above access/egress will need to be considered as part of the site design, and would need to be discussed further with the Environment Agency.

v. Safe Place of Refuge

Assuming that the proposed residential building footprints are limited to Flood Zone 1, then they would be considered to be at low risk of fluvial flooding. As such, the building itself would be a safe place of refuge, without the need for limiting accommodation to a first floor.

vi. Summary of Flood Risk

Assuming that the site is sequentially developed, the issue of access/egress, car park evacuation and restricting access to areas of the site within Flood Zone 2 and 3 have been identified as key

to mitigating the fluvial flood risk to the site. In order to coordinate the above with the proposed registration to the Flood Warning Direct Service, it is advised that a Flood Warning and Evacuation Plan (FWEP) is prepared for the development. Whilst it is not a proposal to evacuate the building of all residents, it is essential to maintain their safety during a flood event. The FWEP would be prepared in liaison with the Emergency Planner at the Local Planning Authority.

4.2 Secondary Flood Risk Sources

i. Groundwater Flooding

Secondary flood sources identified within the site included groundwater flooding. However, no below surface infrastructure and buildings are proposed for the site, as such the site is not considered at risk of flooding from rising / high groundwater

ii. Surface Water Drainage

As noted above, the site is not subject to flooding from overland flow, however the proposed development will increase the impermeable area of the site (currently greenfield), and in turn increase surface water runoff. It is proposed that this source of flooding can however be mitigated to a low and acceptable level through the adoption of a surface water management strategy, which will be developed as part of the full FRA report.

At this stage it is worth noting the size limitation of the developable area within Flood Zone 1, whereby the developable area would need to accommodate the proposed residential development building footprint, as well as the surface water attenuation. Locating the surface water attenuation within Flood Zone 2 and 3 would be unacceptable. The limited size of Flood Zone 1 within the site boundary would likely limit storage attenuation to below ground geocellular storage/oversized pipes.

As a precautionary approach, we usually recommend that finished floor levels are located a minimum of +150mm above external levels to mitigate residual flooding.

5 Summary

Below is a summary of the flood risk findings/recommendations:

- The Environment Agency's flood map indicates that the eastern extent of the site is located largely within Flood Zones 2 and 3 (medium to high risk). An area to the north-west extent of the site is located within Flood Zone 1 (low risk). This has been confirmed through a comparison of modelled flood levels and the detailed topographic survey.
- We would recommend the sequential development of the site, whereby more vulnerable elements (i.e. the residential building footprints) are limited to Flood Zone 1. Water Compatible used such a car parks and landscaped areas would be considered suitable within Flood Zones 2 and 3.
- It is recommended that land raising within Flood Zones 2 and 3 is avoided in order to avoid the requirement for floodplain compensation.
- Site access and egress will need to be developed further to determine the feasibility of a raised pedestrian walkway through the flood zone associated with Webbs Court/Hollands Road (operation site entrance), and/or emergency vehicle access to the site from Manora Road (requiring access across third party land).
- It is recommended that Flood Warning and Evacuation Plan (FWEP) is prepared for the site to coordinate site activity with the Flood Warning Direct Service.

FILE NOTE



- The proposed development will increase the impermeable area of the site (currently greenfield), and in turn increase surface water runoff. It is proposed that this source of flooding can however be mitigated to a low and acceptable level through the adoption of a surface water management strategy. There is however a size limitation of the developable area within Flood Zone 1, whereby the developable area would need to accommodate the proposed residential development building footprint, as well as the surface water attenuation (likely to be below ground geocellular storage or oversized pipes).

Based on the above, we would require an indicative layout to be provided in order to tailor our approach to the final FRA report.