Dear Mr Taylor

REVIEW OF FLOOD RISK DOCUMENTS FOR PROPOSED ALLOCATION OF LAND AT FIVES ACRES, WICKEN BONHUNT AS A GYPSY AND TRAVELLER SITE. LAND OFF POORE STREET, WICKEN BONHUNT, ESSEX

We have reviewed the following documents as part of this pre-application consultation:

1) Stage 1 Flood Risk Assessment dated April 2015, ref. 5794/2.3F, compiled by GTA Civils Ltd
2) Flood Risk Appraisal, dated January 2015, ref. V990-01D, compiled by Ardent Consulting Engineers

We consider that the Stage 1 Flood Risk Assessment (FRA) does not currently meet the requirements of the National Planning Policy Framework (NPPF) for the following reasons:

1. The fluvial flood risk at the site has not been accurately defined using detailed hydraulic modelling.

2. It has not been demonstrated that all of the proposed mobile homes would be located outside the extent of Flood Zone 3. Table 3 Flood risk vulnerability and flood zone ‘compatibility’ in the Planning Practice Guidance\(^1\) makes it clear that ‘highly vulnerable’ development should not be permitted within Flood Zones 3a or 3b.

The FRA states that a narrow strip along the eastern boundary of the site lies within Flood Zone 3a. However, as this area of land is shown to be undefended floodplain on our Flood Map, it is possible that part of the site also lies within Flood Zone 3b. A small part of the site is also shown to be located within Flood Zone 2.

The flood zones shown on our Flood Map are only indicative and therefore cannot be

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\(^{1}\) Flood Risk and Coastal Change section Part 25 Table 3: paragraph 067 Reference ID: 7-067-20140306.
used to define the flood risk at a site-specific level. The extent of Flood Zones 2 and 3 along the eastern boundary of the site needs to be accurately defined based on hydraulic modelling of Wicken Water (as we do not hold any modelling of this watercourse). It must be clearly demonstrated within the FRA that all of the mobile homes will be located outside of Flood Zones 2 and 3. Please note that we will need to review any modelling of this watercourse to ensure the methodology used is acceptable.

We have not reviewed the surface water drainage proposals included in the FRA as we are no longer a statutory consultee, with effect from 15 April 2015, on surface water drainage for sites over 1 hectare. The Lead Local Flood Authority, Essex County Council, should be consulted on these surface water drainage proposals and any flood risk associated with surface water.

We wish to make the following comments on the Flood Risk Appraisal report:

This report states that the site is located within Flood Zone 3a, defined as having a high probability of flooding. However, the majority of the site is located within Flood Zone 1, which is defined as having a low probability of flooding.

Your Authority should consider whether the proposed development passes the Sequential Test given that part of the site lies within Flood Zones 2 and 3.

We acknowledge the concerns raised in this report regarding the availability of safe access and egress to and from the site. This is an important issue that your authority should consider in determining any planning application. However, we are not able to comment on the adequacy of any emergency evacuation procedures as we do not carry out this role in a flood event. Your authority’s Emergency Planners should be consulted on this matter.

The report has correctly identified that the site is not located within a flood warning area. However, it may be possible for residents to receive notification of flooding via other means – e.g. a trigger level within Wicken Water. Please note that the Flood Response Plan included in Appendix C of the Stage 1 FRA does not include any details of a trigger that will be used to take appropriate action. As such the Flood Response Plan may not be considered adequate.

Please note that a review of any subsequent hydraulic modelling work – see above - would be subject to a new charging agreement, as advised in the Programme of Advice previously issued to you.

Yours sincerely

Andrew Hunter
Sustainable Places - Planning Advisor