To Whom it May Concern,

With reference to Uttlesford District Council’s letter dated 2nd March 2015, an applicant is currently seeking an allocation to provide a gypsy and traveller site on the land known as Five Acres, in Wicken Bonhunt. Following initial consultation, UDC requested that:

- “A flood risk assessment (FRA) which identifies and assesses the risks of all forms of flooding to and from the development and demonstrates how these flood risks will be managed, taking climate change into account. Please see the Environment Agency website [https://www.gov.uk/planning-applications-assessing-flood-risk](https://www.gov.uk/planning-applications-assessing-flood-risk) for further advice and guidance.

- The FRA needs to address the concerns raised by the Environment Agency that any proposal would need to consider the safety of people, including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements.

- How the issue regarding sewage disposal can be addressed bearing in mind that a septic tank may not be appropriate due to the site flooding.

- How any mitigation measures needed to overcome the flooding may impact on the protected lane.

- How any mitigation measures needed to overcome the flooding may impact on the viability of the site”.

A basic FRA was prepared on behalf of the applicant by GTA Civils Limited in April 2015 which was submitted to the Council in response to the above. The applicant’s FRA of the FRA honestly concludes that:

- “The occupants do not have a safe access route to dry land to the south”. (Nor is a safe access route available to the north along Poore Street).

- “Poore Street is liable to flood to a depth 0.9m in extreme storms. This would trap occupants within their homes for this duration”.

Having reviewed the applicant’s FRA, there are not only fundamental deficiencies but the document is also misleading and inaccurate, suggesting that a mere desktop approach has been adopted with no reference to the representations made as part of the consultation process. The issues which remain unaddressed can be summarised as:
- The FRA fails to demonstrate how the occupants and development would be safe for the lifetime of the scheme, considering the impact of climate change. Paragraph 4.11 in the GTA Report suggests that climate change will increase the risk of flooding by +30% and yet no analysis of the potential impact or proposed mitigation measures is provided.

- The applicant’s FRA states in paragraph 1.1 that the assessment has been prepared “in relation to the planning application for the change of use to Gypsy and Traveller residential pitches” which is an inaccurate statement.

- The FRA does not offer any detailed evacuation plan other than suggesting that the occupants would not be at risk if they stayed on-site. However, in the event of an emergency, emergency services would not be able to reach the occupants until the floodwater has receded. In the event of a critical illness, (e.g. heart attack) lives could be at risk if the emergency services cannot access the site.

- The FRA suggests the static caravans will be elevated 300mm above the ground but the floodwater rises above this depth and the extent of floodwater encroachment is inaccurately mapped, as a far greater area of the site is known to flood (see below):
Photo 2. Nov 2014. The third flood in 12 months. The view (over the fence) showing 10 Acres flooded. The boundary with 5 Acres is to the right of shot. It shows flooding many meters into the site almost up to the hedge line (see aerial shot) which extends south from the field’s hedge on the site boundary.

Photo 3. Field adjacent to 5 Acres on the other side of the site to the north taken Nov 2014. Again flooded almost 70 meters into the site as far as first telegraph pole.
- The photographic evidence which was submitted independently to challenge the site’s inappropriate allocation for a gypsy site, illustrates that the extent of flood water encroachment into the site is frequently observed as extending further into the site than currently illustrated in the Environment Agency’s indicative floodplain mapping. This would suggest that the modelling studies setting the flood zone extents is inaccurate and would expect detailed modelling to have been included in the applicant’s FRA to accurately define the extent of the floodplain.

- Paragraph 3.6 of the applicant’s FRA states that Poore Street floods to the east and south, but not to the west including the application site. This statement is inaccurate as both the site itself floods as well as the road to the north.

- Furthermore, paragraph 3.7 of the applicant’s FRA concludes “that the main risk of flooding to this site is from surface water. Although there is a narrow strip of land in FZ3A this is not considered to be a major problem”. The evidence provided clearly demonstrates that the floodwater from the Wicken Water will encroach further into the applicant’s site than currently mapped which strongly suggests that further hydraulic modelling should have been carried out to accurately identify the extent of the floodwater encroachment and formed part of the applicant’s FRA.

- How the mitigation measures to overcome flooding may impact on the protected lane, have not been addressed.

- A corridor is proposed whereby overland flow routes will be conveyed from the north to the south of the site, potentially increasing the rate with which the floodwater passes towards the neighbouring land, thus increasing the level of flood risk off-site.

- No consideration for the need to provide compensatory floodplain storage has been provided.

- The drainage strategy will seek to use infiltration drainage techniques and “all external areas will be either porous (e.g. gravel or permeable pavings) or impermeable and laid to falls and draining to ground. The mobile homes’ roofs will also drain to the ground”. Yet no evidence of the soil’s soakage potential/limitations, characteristics or suitability has been provided.

- Part of the surface water run-off from the site (associated with the amenity block) will be directed to the Wicken Water which will be frequently flooded and no supporting evidence or modelling work is provided to demonstrate how the drainage
system would function effectively during extreme storm events, with a surcharged outfall.

- No details of the surface water attenuation proposals have been provided to demonstrate how the SuDS system would withstand the impact of the run-off generated by a 1:100 year rainfall event, including an additional 30% for climate change impact.

- The method of disposal for the foul waste water has not been adequately addressed in any detail.

- The Flood Response Plan included in Appendix C of the FRA suggests the site and its occupants will simply rely on a sign being placed in each mobile home and advises occupants should monitor the weather and listen to the radio and/or watch the television. What if there is a power cut, which is not an uncommon occurrence during extreme events? The rate of floodwater inundation is unknown and the only means of escape via Poore Street could potentially be under water very rapidly, leaving occupants insufficient time to evacuate.

In view of the above, it is concluded that the applicant’s FRA does not fully address the specific points outlined in Uttleford District Council’s letter dated 2nd March 2015 and there are fundamental deficiencies which have not been properly or fully addressed, whilst also presenting information which is inaccurate or misleading.