

Flood Risk Assessment

In respect of:
Conversion of three outbuildings to form dwellings with associated works.

At:
Park End Lodge
Castle Lane
Moreton Vallance
Gloucestershire
GL2 7NE

On behalf of:
Mr Richard Downton

August 2022





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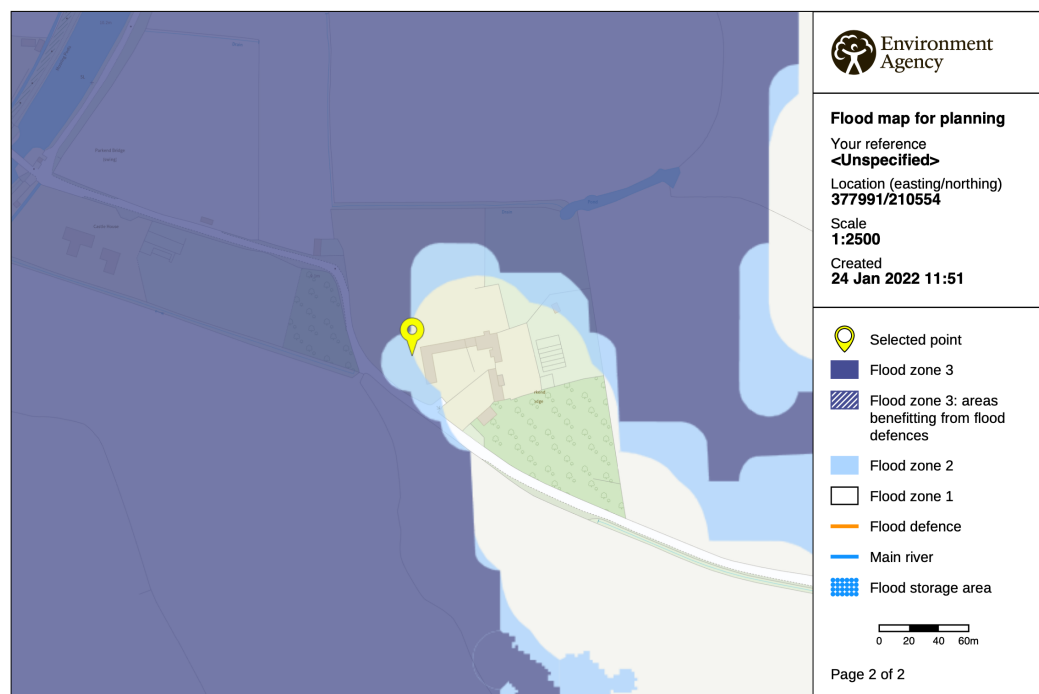
1.0 Introduction

- 1.1. The Flood Risk Assessment has been prepared by Mcloughlin Planning in support of a full planning application for the conversion of three outbuildings to residential dwellings and associated works at Park End Lodge, Castle Lane, Moreton Vallance
- 1.2. The Flood Risk Assessment is carried out as it is noted that a portion of the application site falls within Flood Zone 2 as defined by the Environment Agency's Flood Maps for Planning. As such, the NPPF set out the requirement for bespoke Flood Risk Assessments to be submitted for such applications. However, given the nature of the development it is considered that a relatively basic assessment is appropriate in this case.
- 1.3. To this end the Assessment is structured as follows:
 - Section 2 – The Site and the Proposed Development
 - Section 3 – Policy Context
 - Section 4 – Assessment of Flood Risk
 - Section 5 – Addressing the Sequential Test
 - Section 6 – Conclusions

2.0 The Site and the Development Proposal

2.1. The application site relates to Park End Lodge, Castle Lane, Moreton Vallance. The site comprises a parcel of residential land, of approximately 2.6 Hectares in area. The land is relatively flat and laid to grass with a hardstanding access drive and parking area.

The Environment Agency's Flood Maps for Planning indicate that the site is partially within Flood Zone 2 (Medium Risk). Therefore, the annual probability of direct fluvial flooding is between 0.1% and 1% for the portion of the site within this zone. The majority of the site sits within flood zone 1, which has a less than 0.1% annual probability of flooding.



2.2. The current application seeks full permission for the conversion of three outbuildings to dwellings, including the drainage and material details. The built form of the proposal sits wholly outside of Flood Zone 2 and within flood zone 1.

3.0 Policy Context

- 3.1. The primary policy context governing flood risk can be found in the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance (PPG). Locally the relevant policy for the site falls into the Stroud Local Plan.

The National Planning Policy Framework (NPPF)

- 3.2. Paragraphs 159 and 160 make it clear that the government's intention is to locate development away from areas at highest risk of flooding. Where development is necessary in higher risk areas, it should be made safe for its lifetime without increasing flood risk elsewhere.
- 3.3. The NPPF seeks to achieve this by applying a 'Sequential Test' to development, which is to push development to Flood Zone 1. Only where no suitable sites are available within Flood Zone 2 should Flood Zones 2 and 3 be considered.

Planning Practice Guidance

- 3.4. The advice contained within the PPG largely reflects that in the NPPF. The guidance in paragraph 033 states that:

"When applying the Sequential Test, a pragmatic approach on the availability of alternative sites should be taken"

- 3.5. Paragraph 034 confirms that:

"It is for the local planning authority to consider the extent to which Sequential Test considerations have been satisfied, taking into account the particular circumstances in any given case."

- 3.6. The developer should justify what area of search has been used when making the application.
- 3.7. Paragraph 066 of the PPG sets out the Flood Risk Vulnerability Classifications, with Dwelling houses considered more vulnerable in flood risk terms. In Flood Zone 2, More vulnerable categories such as dwelling houses are considered appropriate forms of development.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	x	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	x	x	x	✓*

Key:

✓ Development is appropriate

x Development should not be permitted.

- 3.8. Notwithstanding this, it is feasible that applications which do not result in a net increase in dwellings, automatically pass the sequential test as it does not increase the flood risk implications that currently exist. This is addressed in greater detail within the latter sections of the Statement.

Stroud Local Plan (Adopted December 2017)

- 3.9. Policy ES4 relates to Flood Risk Management, it states that:

"The Strategic Flood Risk Assessments (SFRA 1 and 2) will be used to inform the location of future development within the district. Applications will be supported by Flood Risk Assessments where appropriate that demonstrate the development will be safe, not increase flood risk elsewhere, and maximise opportunities to reduce flood risk. For development in areas with known surface water flooding issues, appropriate mitigation and construction methods will be required."

- 3.10. Following this, the Policy goes on to say that:

"Development will:

1. *Conserve and enhance the ecological flood storage value of the water environment including watercourse corridors*
2. *Open up any culverted watercourse where safe and practicable to create an asset of community value*
3. *Improve water efficiency through incorporating appropriate water conservation techniques, including rainwater harvesting and grey water recycling.*
4. Discharge surface run-off, not collected for use, to one or more of the following, listed in order of priority:
 - Discharge into the ground; or where not reasonably practicable
 - Discharge into a surface water body; or where not reasonably practicable
 - Discharge to a surface water sewer, highway drain, or other drainage system; or where that's not reasonably practicable
 - Discharge into a combined sewer
5. Connect to the main foul sewer network where possible
6. Use natural environment including woods and trees to deliver sustainable water issues solutions.

4.0 Assessment of Flood Risk

- 4.1. In assessing flood risk, the majority of the site is located in Flood Zone 1, with a section of the site (garden areas), falling into Flood Zone 2. Therefore, naturally an assessment regarding flood risk and drainage impact should be taken.
- 4.2. It is first noted that by the very nature of the application there will not be an increase in the amount of built form on the site, with the proposal seeking permission to convert existing buildings into dwellings.
- 4.3. There is no new built form within Flood Zone 2, resulting in no detrimental impact on the flood storage capacity for the site. Furthermore, given the existing built form to be converted and is located in Flood Zone 1, there will be no greater flood risk implications.
- 4.4. In terms of surface water, there would be no physical change to the existing surface water run off arrangements that the site currently benefits from. Existing surface water from the main house, barns and landscaping is either drained to a soakaway or harvested in rainwater butts and used for irrigation.
- 4.5. The existing strategy for surface water drainage is to be retained with additional rainwater harvesting for the south barn. Replacing the areas of hardstanding with a more permeable gravel surface which will also reduce surface water runoff.
- 4.6. The foul drainage from the main house is currently discharged into a septic tank to the north. The proposed strategy for drainage from the north, east and south barns is to install a septic tank and drainage field, dependant on ground conditions. This can be sited to the south east of the south barn, located away from Flood Zone 2 in Flood Zone 1.
- 4.7. As stated above, Flood Zone 2 covers an existing access to the existing property on the site. The Primary access to the barns sits within Flood Zone 1. This access would also be available to the main house and in the case of an emergency access out of the site can be taken through this access travelling east onto Castle Lane, which is also in Flood Zone 1. This site therefore benefits from a convenient means of escape in the event of a flood and will not put pressure on emergency services at such times. It must however be noted that this was the current arrangement with the existing dwelling on the site, thus the situation will not be materially worse than the situation which already lawfully exists.
- 4.8. The proposal is therefore, considered acceptable in terms of flood risk and drainage implications, with the development not exacerbating the situation on the site in terms of flood storage capacity.

5.0 Addressing the Sequential Test

5.1. The NPPF and the PPG both indicated that should new development be proposed outside Flood Zone 1 then a 'Sequential Test' should be carried out. In this case however, the proposal is to retain the as built dwelling and outbuilding, which has replaced a dwelling in the same location. Therefore a sequential test should not be required in this regard as the number of dwellings has not changed.

5.2. However, if the council feel the sequential test to be necessary the paragraph 033 of the PPG should be considered. This clarifies that:

"When applying the sequential test, a pragmatic approach on the availability of alternative sites should be taken".

5.3. Paragraph 034 confirms that

"It is for local planning authority to consider the extent to which sequential test considerations have been satisfied, taking into account the particular circumstance in any given case".

5.4. Given that the built form of development sits wholly within Flood Zone 1 and the only area of the proposal in Flood Zone 2 being garden land. The sequential test is therefore considered to have been satisfied through this development. Ultimately, the NPPF confirms that housing development in Flood Zone 2 is acceptable in principle. Under these circumstances there is no need to apply the 'exceptions test'.

6.0 Conclusions

- 6.1. The purpose of this document has been to provide a robust assessment to demonstrate the proposal is acceptable in flood risk and drainage impact terms, as well as addressing the reasons as to why the proposal complies with the Sequential Test set out by the NPPF, should be considered appropriate in this case.
- 6.2. Further to this justification, emerging Local plan policy ES4 refers to the Stroud Local Plan for Flood Risk Management.
- 6.3. It has been demonstrated that the proposal complies with the relevant national and local policies and ultimately constitutes sustainable development and should be deemed acceptable.



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