

Mr Calum Rowley
East Riding of Yorkshire Council
Planning & Development Control
County Hall Cross Street
Beverley
North Humberside
HU17 9BA

Our ref: RA/2024/146812/01-L01
Your ref: 23/03925/REG3
Date: 27 February 2024

Dear Mr Rowley

**ERECTION OF SUB-STATION, SWITCH ROOM, BIN STORE AND ASSOCIATED
LANDSCAPING TO EXISTING YARD, NEW ROOF COVERING AND
REPLACEMENT ROOF LANTERNS**

**GOOLE MARKET HALL ESTCOURT TERRACE GOOLE EAST RIDING OF
YORKSHIRE DN14 5AB**

Thank you for your consultation regarding the above proposal. We have reviewed the information submitted with the application and we are raising an objection to the proposal. Our detailed comments are as follows.

Flood Risk

Our Flood Map for Planning shows the site lies within Flood Zone 3, with a high probability of flooding from rivers. The application for sub-station, is considered to be a 'less vulnerable' land use in [Annex 3](#) of the National Planning Policy Framework.

Objection

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change section of the planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- consider how a range of flooding events (including extreme events) will affect

people and property.

The development lies within the 'Rapid Inundation Zone' as defined in Appendix E of the East Riding of Yorkshire Council Level 2 Strategic Flood Risk Assessment (SFRA) for Goole. The submitted FRA fails to provide an assessment of the residual flood risk, as required by section 4.1 of the Level 2 SFRA. We expect flood risk mitigation to follow that set out in Table 6-2 of the SFRA, Spatial Planning and Development Management Minimum Requirements for the vulnerability class of the proposal Strategic flood risk assessment (eastriding.gov.uk). Policy ENV6 requires adherence to SFRA recommendations.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Informatives

Sequential test - advice to LPA

What is the sequential test and does it apply to this application?

In accordance with the National Planning Policy Framework (paragraph 162), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test, which are consistent with the use for which the site was allocated.

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the local planning authority, to decide whether the sequential test has been satisfied, but the applicant should demonstrate to you, with evidence, what area of

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search has been used. Further guidance on the area of search can be found in the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

Further planning advice

Please advise the applicant that if they would like to get further specific advice on how to overcome our objection, they can take advantage of our planning advice service. We can offer services including meetings, telecons and reviews of revised information prior to formal submission. We encourage the applicant to contact us directly to discuss this further.

We currently charge £100 plus VAT per officer per hour. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms for our charged for service are available [here](#).

We trust this advice is useful.

Yours sincerely

Mr Aaron Miles
Planning Advisor

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