

Alison Webster
Gravesham Borough Council
Sent via email

Our ref: KT/2024/131775/01-L01
Your ref: 20240448
Date: 09 July 2024

Dear Alison Webster

Conversion of existing farm office building, store and stables to a residential dwelling, ancillary home office/games room, garden storage and re-purposed stable. Erection of boundary walls, repositioned vehicular access and erection of new entrance gates, and associated works.

Giles Farm, Church Street, Higham, Rochester, Kent ME3 7LP

Thank you for consulting us on the above application.

Environment Agency Position- Flood Risk

As this development poses an unacceptable risk to life from flooding, we **object** to this application and recommend that planning permission is refused.

We have reviewed the submitted documents in addition to the Flood Risk Assessment (FRA), and we have concerns relating to the proposed finished floor levels for sleeping accommodation within the FRA. In the absence of an acceptable FRA, we object for the following reasons.

Reason

The site lies within Flood Zone 3a, which is land defined by the planning practice guidance as having a high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life and/or property from tidal inundation would be unacceptable if the development were to be permitted.

With the proposed finished floor levels, the submitted FRA fails to demonstrate the proposed development will have finished floor levels for all sleeping accommodation above the 1 in 200 year plus an allowance for climate change flood levels. The submitted FRA does not comply with the site specific flood risk assessments as set out in paragraphs 20 and 21 of the Planning Practice Guidance.

Overcoming our Objection

We would require the downstairs study/bedroom to be raised above the Downriver Breach Inundation Modelling flood level (for epoch 2100) of 3.75 metres Above Ordnance Datum (mAOD). Any data detailing the finished floor levels or flood levels needs to be presented as 'mAOD'.

If raising the floor level is unachievable, we would recommend that there be no sleeping accommodation on the ground floor of the property.

If the applicant would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our cost recovery service.

If they wish to request a meeting, or document review, please contact our team email address at KSLPlanning@environment-agency.gov.uk

Further information on our charged planning advice service is available at:
<https://www.gov.uk/government/publications/planning-and-marine-licence-advice-standard-terms-for-our-charges>

If you are minded to grant permission contrary to our advice, it will be necessary to re-consult us to ensure that the risk is appropriately addressed by planning conditions.

Please do not hesitate to contact us should you require any further information.

Yours faithfully

Ms Laura Edwards

Planning Advisor

Direct e-mail KSLPLANNING@environment-agency.gov.uk