

The Planning Inspectorate
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BS1 6PN

Our ref: WA/2024/131683/01-L02
PINS ref: APP/X0360/W/25/3364304
LPA ref: 242067
Date: 01 September 2025

Dear Sir/Madam

OUTLINE APPLICATION FOR THE PROPOSED ERECTION OF UP TO 99 NO. DWELLINGS, GREEN INFRASTRUCTURE, OPEN SPACE, PEDESTRIAN AND CYCLE LINKS, RECREATIONAL FACILITIES AND OTHER ASSOCIATED INFRASTRUCTURE AND ACCESS POINTS ON LODGE ROAD AND TAPE LANE WITH REQUIRED IMPROVEMENTS. (ALL MATTERS RESERVED EXCEPT FOR MEANS OF ACCESS.) LAND BETWEEN LODGE ROAD AND TAPE ROAD, HURST RG10 0EG

Following the recent completion of the third modelling review and the finding of the model fit for purpose, our nominated flood specialist Jo Marchant has completed a review of the updated flood risk assessment. Her findings are included below.

Environment Agency position

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

Reasons

The submitted FRA dated August 2025 by SLR consulting Ltd 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 Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere.

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. Specifically the FRA will need to:

- demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere.

Floodplain storage

Any increase in built footprint or raising of ground levels should be compensated up to the 1% AEP plus an appropriate allowance for climate change flood level (the design flood level). This is necessary to prevent the proposed development reducing floodplain storage and displacing flood waters, thereby increasing flood risk elsewhere.

Level for level floodplain compensation is the preferred method of mitigation and should be considered within the FRA. Level for level floodplain compensation is the matching of floodplain storage volumes lost with new floodplain storage volume gained through the reduction of ground levels. Please note for this to be achievable it requires land on the edge of the floodplain and above the 1% annual exceedance probability (AEP) flood level with an appropriate allowance for climate change to be available. A comparison of ground levels (from a topographical survey) with modelled floodplain levels will show if land is available above the 1% AEP flood level with an appropriate allowance for climate change to be used as compensation.

We recommend that level for level floodplain storage calculations are provided in a table that sets out the volume of floodplain storage lost (cut) and the volume of floodplain storage gained (fill) for each of the slices. Typically, the thickness of a slice should be 100mm or 200mm, dependent on-site specific considerations. This may vary in the case of large, very flat sites, where 0.05 metres could be used; or in very steep sites with a high range of flood water levels. Slice thickness should be set to provide 10 to 15 slices in these cases. It will need to be demonstrated that there would be no net loss in storage volume for any slice.

A location plan that corresponds with the table should also be submitted showing where the compensation will be located on site. The location of the changes in floodplain storage should be clearly identified, demonstrating the scheme would be hydraulically connected for each slice. It is not acceptable to propose works several kilometres away or separated from the site by a significant structure such as a weir, bridge or other obstruction.

Excavation of the proposed floodplain compensation scheme should be completed prior to the construction of development to ensure floodplain capacity is maintained.

If this cannot be achieved, then the applicant may need to amend the development to ensure that there will be no increase in flood risk elsewhere (for example by reducing built footprint or amount of land raising proposed).

Closing Comments

If you have any additional questions, please contact me at the email address provided.

Yours faithfully

Mr Oliver Murray
Planning Advisor