

<b>APPLICATION NO: 23/01314/FUL</b>		<b>OFFICER: Mrs Lucy White</b>
<b>DATE REGISTERED:</b> 24th August 2023		<b>DATE OF EXPIRY:</b> 19th October 2023/agreed Extension of Time until 20 <sup>th</sup> November 2023
<b>WARD:</b> Lansdown		<b>PARISH:</b>
<b>APPLICANT:</b>	Cheltenham Borough Council	
<b>AGENT:</b>	Mr David Jones	
<b>LOCATION:</b>	Car Park Synagogue Lane Cheltenham	
<b>PROPOSAL:</b>	Retention of a temporary public, pay and display car park (forming an extension to an existing car park) for an additional period of 3 years	

## Update to Officer Report

### 1. OFFICER COMMENTS

- 1.1. Since the publication of the officer report, a consultation response has been received from the Environment Agency, as set out below. Their comments do not alter the officer recommendation or suggested conditions.
- 1.2. In summary, the Flood Risk Assessment provided by the applicant and existing outputs from the Environment Agency's River Chelt hydraulic model confirm that the application site actually lies within Flood Zones 1 & 2 and not Flood Zone 3. Given that there are also no proposed physical changes to the site or works within 8 metres of the top of bank of the River Chelt, the Environment Agency, from a flood risk perspective, have no objections to the extension of the current use of the site for a further 3 years.

*Thank you for consulting us on the above application which was received on 23 October 2023. We have the following comments for your consideration.*

*Further to the Flood Risk Assessment (FRA) submitted by Curtins dated 6 September 2023 in support of the above planning application the Environment Agency has no objections from a flood risk perspective.*

#### Proposed Development

*The proposal is for the continuation of use of an existing public car park on a former industrial site.*

#### Flood Risk Vulnerability

*As correctly highlighted in section 4.1 of the FRA the current car park would be considered to have a less vulnerable use as defined in Annex 3 of the National Planning Policy Framework (NPPF).*

### *Flood Zones*

*The site is currently located within Flood Zone 3 as set out in section 4.2 of the FRA and shown on our Flood Map for Planning as defined in Table 1 of the Flood and Coastal Change section of the National Planning Practice Guidance (NPPG).*

*However this mapping is not based on the River Chelt model outputs and does not take account of the presence of the wider Chelt Flood Alleviation Scheme that covers the town and at this location consists of a formalised river channel and flood relief culvert.*

### *Flood Risk Information*

*Some limited information from the existing Environment Agency River Chelt hydraulic model has been included within Appendix D of the FRA.*

*Further investigation of the 1D nodes for both the 4% Annual Exceedance Probability (AEP) and 1% AEP events show that when compared to the ground level survey provided referenced ICBR0035-D-002 that all flood peak levels would remain in bank, hence the site would be considered to actually be located within Flood Zones 2 and 1.*

*An assessment of the July 2007 event shows that the site was affected by out of bank overland river flows that it is suggested entered the site via St George's Terrace to the north, this is likely to have been combined with surface water surcharging from the local highway drainage system.*

*In the wake of the July 2007 floods some alterations to the scheme were undertaken, such as changes to protective grille arrangements to reduce the risk of blockages that resulted in flooding in some areas during the event.*

### *Flood Defences*

*The Flood Alleviation Scheme at this location consists of an engineered channel and supplementary flood relief culvert, there are no raised defences present.*

### *Climate Change*

*As the lifetime of the proposed development has been set at 3 years it is felt that an assessment of climate change is not relevant in this instance and the Design Flood Level*

*(DFL) should be set at the 1%AEP level which ranges between 54.88 to 55.45m AOD(N) from Synagogue Lane upstream.*

#### *Other Forms of Flooding*

*The western part of the site would appear to be at high risk of surface water flooding based on Gloucestershire County Councils Risk of Flooding from Surface Water maps, but most of this is outside the red line boundary of the application site.*

*The site is located within the area at risk from reservoir flooding during both normal dry and wet conditions, this is linked to the reservoir at Dowdeswell. Whilst highlighted as in an area at risk, the probability of reservoir failure is considered low due to the strict regulations in place with regards their maintenance.*

#### *Access & Egress*

*As the site is located in Flood Zones 1 and 2 this is not deemed to be an issue for the site in this instance. Nevertheless you may wish to consult with your Emergency Planners on this matter.*

#### *Flood Warning & Evacuation Plan*

*With regards management of the site a comprehensive Flood Warning service operates in this local area. A trigger level may be sought to assist in evacuation. Again we would refer you to your Emergency Planners for their comments.*

#### *Main River Easement*

*Whilst the red line boundary encompasses land within 8 metres of the top of bank of a main river (River Chelt) there are no works or alterations to existing structures shown to be proposed within the easement distance that would require the applicant to apply for the separate permission of the Environment Agency in the form of a Flood Risk Activity Permit under the Environmental Permitting Regulations (2016).*

#### *Conclusions*

*In conclusion the detailed evidence provided and existing outputs from the Environment Agency's River Chelt hydraulic model confirm that the site actually lies within Flood Zones 1 & 2.*

*There are also no proposed physical changes to the site or new works within 8 metres of the top of bank of the River Chelt which is designated a main river watercourse.*

*Hence the Environment Agency have no objections to the extension of the current use of the site for a further 3 years from a flood risk perspective.*

*I trust the above will assist in your determination of the application. Please do not hesitate to contact me if you have any queries. A copy of the subsequent decision notice would be appreciated.*