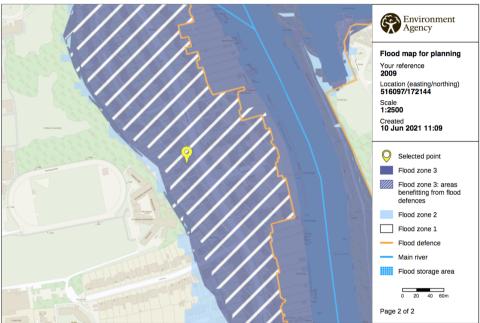
The application site is located within Flood Zone 3. This is an area with a high probability of flooding but does benefit from established flood defenses (see Environment Agency flood map below).



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Sequential and Exception Test are not required as the development is considered 'minor' by virtue of it being a householder development for a proposed extension and new garden studio within the curtilage of an existing dwelling.

A completed Environment Agency 'Householder and Other Minor Extensions in Flood Zones 2 and 3' form is attached to the end of this statement and confirms that the floor levels within the proposed development will be set no lower than the existing levels.

In additional and where possible the detailed design of the proposal, if approved, will consider adopting flood resilience techniques in accordance with CLG document 'Improving the floor performance of new buildings – Flood resilient construction'. The detailed design approach will be to follow a water exclusion strategy by developing resilient details that would be permanent measures and would included the use of low permeability materials. Throughout however any such details will need to be considered against cost, practicability of construction and aesthetic acceptability.

At this early stage of the design it is anticipated that the floor construction will be in the form of a ground bearing concrete slab of at least 150mm thick laid over a minimum 1200 gauge damp proof membrane. This construction will be insulated internally with rigid insulation. The finished internal floor level of the proposed extension will be at the same level as the existing finished internal floor level of the house, the existing flood risk situation is not worsened. Further more this internal floor level is 400mm above the natural level of the existing rear garden.

External walls have been designed throughout as masonry construction. At low level all walls will be 'started' with engineering bricks (where aesthetics permit). Where solid masonry walls are indicated for the garden studio these will be insulated internally.

All of these construction approaches are as preferred in the above referenced CLG document and incorporate materials that have 'good' resilience to water penetration, 'good' drying abilities and 'good' retention of pre-flood integrity. Timber has been avoided for doors and low level windows, with aluminum and steel preferred and double-glazed sealed units adopted throughout.

September 2024

(completed 'Householder and Other Minor Extensions in Flood Zones 2 and 3' form attached below)



Householder and other minor extensions in Flood Zones 2 and 3

This guidance is for domestic extensions; and non-domestic extensions where the additional footprint created by the development does not exceed 250 square metres. It should NOT be applied if an additional dwelling is being created.

We recommend that:

Planning Authorities

- 1) Refer the applicant to the standing advice pages on the Environment Agency website or provide them with a copy of this page for them to include as part of the planning application submission.
- 2) Check the planning application to ensure that one or other of the mitigation measures from the table below has been incorporated.

Applicants complete the table below and include it with the planning application submission. The table, together with the supporting evidence, will form the Flood Risk Assessment (FRA) and will act as an assurance to the Local Planning Authority that flood risk issues have been adequately addressed. Print' the completed form to a PDF writer if submitting this form electronically.

Applicant to choose one or other of the flood mitigation measures below	Applicant to provide the LPA with the supporting Information detailed below as part of their FRA	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'
Either; Floor levels within the proposed development will be set no lower than existing levels AND, flood proofing of the proposed development has been incorporated where appropriate.	Details of any flood proofing / resilience and resistance techniques, to be included in accordance with `Improving the flood performance of new dwellings' CLG (2007)	YES
Or; Floor levels within the extension will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones	This must be demonstrated by a plan that shows finished floor levels relative to the known or modelled flood level. All levels should be stated in relation to Ordnance Datum ¹	

Subterranean/basement extensions

Due to the risk of rapid inundation by floodwater; basements should be avoided in areas at risk of flooding.

The LPA may hold additional guidance for basement extensions.

Self-contained basement dwellings are 'Highly Vulnerable' development and should not be permitted in flood zone 3. We are fundamentally opposed to these developments.

Continued...

¹ Ordnance Datum or the abbreviation 'OD' is the mean level of the sea at Newlyn in Cornwall from which heights above sea level are taken. The contour



Cumulative impact of minor extensions and the removal of Permitted Development rights.

PPS25 paragraph D16 highlights the potential for the cumulative impact of minor extensions to have a significant effect on flood risk. Where local knowledge (Strategic Flood Risk Assessment held by the LPA/information provided by the parish council) suggests this is the case the guidance contained in FRA guidance note 2 should be applied². FRA guidance note 2 can also be applied where permitted development rights have been removed for flood risk reasons. The Environment Agency does not usually comment on minor development in this category.

Permeable paving and changes to permitted development rights for householders

On the 1st October 2008 the General Permitted Development Order (GPDO) in England was amended by the Government (Statutory Instrument 2008 No. 2362).

One of the changes introduced by the GPDO amendment is the removal of permitted development rights for householders wishing to install hard surfacing in front gardens which exceeds 5 square metres (i.e. 1m x 5 m) without making provision to ensure permeability. This means that use of traditional materials, such as impermeable concrete, where there is no facility in place to ensure permeability, requires an application for planning permission.

In order to help and advise householders of the options for achieving permeability and meeting the condition for permitted development status the Department for Communities and Local Government (CLG) has produced guidance on permeable paving which can be found on the following link http://www.communities.gov.uk/ publications/planningandbuilding/pavingfrontgardens.

The Environment Agency support this change to the GPDO as it is in line with the recommendations of the Pitt Report regarding the need to better tackle the impact of surface water flooding. However, Local Planning Authorities should determine these applications in accordance with the CLG guidance **without** consulting the Environment Agency.

End of comment