

Northumberland National Park
Eastburn,
South Park,
Hexham,
Northumberland NE46 1BS

Our ref: NA/2020/115127/01-L01
Your ref: 20NP0044
Date: 21 September 2020

Dear Sir/Madam

CONVERSION OF FORMER KENNELS / HEN HOUSE TO FORM NEW FISHING LODGE (HOLIDAY ACCOMMODATION) WITH ASSOCIATED HARD LANDSCAPING LAND TO THE EAST OF HARBOTTLE CASTLE, HARBOTTLE, NORTHUMBERLAND

Thank you for referring the above application which we received on 1 August 2020.

Environment Agency Position

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

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. 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;
- Consider how people will be kept safe from the identified flood hazards. This could be provided through methods such as raised finished floor levels and appropriate temporary measures of refuge. In particular, ground floor sleeping accommodation within flood zone 3 is considered to be inappropriate;
- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of events including the identification of safe access and egress routes. In particular, consideration should be made to the end user of short-term holiday lets who may be unfamiliar with flood risk within the local area;
- Consider how climate change will impact upon the specific development



- using appropriate climate change allowances; and
- Consider the use of flood storage compensation - the current state of the structure is considered to be floodable. The FRA should discuss whether the proposed development has the potential to increase flood risk elsewhere.

Overcoming our objection

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

Separate to the above matter, we also have the following advice/comments to offer:

Exception test - Advice to LPA

In accordance with the National Planning Policy Framework (NPPF), the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

Flood Alert Area - Advice to Applicant

Please note that the FRA makes reference to “subscribe to the EA flood warning system” at this site. The site is only covered by a Flood Alert and not a Flood Warning.

Flood Alerts warn people of the possibility of flooding and encourage them to start making low impact preparations for flooding they are only issued within working hours (normally 6am to 9pm) and can be issued between 2 and 12 hours before a flood event.

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

- For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.



- To get help during a flood, visit <https://www.gov.uk/help-during-flood>.
- For advice on what do after a flood, visit <https://www.gov.uk/after-flood>.

Flood Modelling - Advice to Applicant

We have flood modelling information for the River Coquet which could be used to inform the FRA. For further details about our products /service and to request information, please contact our local Customer & Engagement team on northeast-newcastle@environment-agency.gov.uk. Please note that it can take up to 20 working days to process any requests for information.

Flood Warning and Emergency Response - Advice to LPA

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The [planning practice guidance](#) (PPG) to the NPPF states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the PPG.

Biosecurity - Advice to LPA/Applicant

Site equipment and vehicles should be cleaned and dried thoroughly prior to arrival on site and when leaving site, with the use of a disinfectant suitable for use on aquatic sites to limit the spread of harmful pathogens, live organisms, seeds or other plant material should also be utilised.

The Check Clean and Dry campaign should be followed; check your equipment and clothing for live organisms, particularly in areas that are damp or hard to inspect; clean and wash all equipment, footwear and clothing thoroughly. If you do come across any organisms, leave them at the water body where you found them; dry all equipment and clothing as some species can live for many days in moist conditions. It is also important to make sure water is not transferred elsewhere. Further information on biosecurity can be found at the following link <https://secure.fera.defra.gov.uk/nonnativespecies/checkcleandry/index.cfm>



Environmental Permit - Advice to applicant

It is noted within the supplied drawings that a new/replacement fence is proposed near to the River Coquet. The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Non-Mains Drainage - Advice to Applicant

In addition to planning permission you may also require an Environmental Permit from the Environment Agency. Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24 hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply.

Where the proposed development involves the connection of foul drainage to an



existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development.

Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit. Further advice is available at:
<https://www.gov.uk/permits-you-need-for-septic-tanks>

Please do not hesitate to contact me if you have any questions regarding this letter.

Yours faithfully

Lucy Mo
Planning Technical Specialist - Sustainable Places

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