

Central
Bedfordshire
Council
Priory House
Monks Walk
Chicksands,
Shefford SG17 5TQ



**TO EACH MEMBER OF THE
DEVELOPMENT MANAGEMENT COMMITTEE**

02 February 2016

Dear Councillor

DEVELOPMENT MANAGEMENT COMMITTEE - Wednesday 3 February 2016

Further to the Agenda and papers for the above meeting, previously circulated, please find attached the Late Sheet:-

13. Late Sheet

Should you have any queries regarding the above please contact Democratic Services on Tel: 0300 300 4040.

Yours sincerely

Helen Bell,
Committee Services Officer
email: helen.bell@centralbedfordshire.gov.uk

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LATE SHEET

DEVELOPMENT MANAGEMENT COMMITTEE – 3rd February 2016

Item 07 (Pages -) – CB/15/02482/FULL – Paradise Farm, The Causeway, Clophill, MK45 4BA

Additional Consultation/Publicity Responses

Comments were sent to all Councillors on the 27th January from an adjacent land owner. The landowner has raised concerns that the summary of consultation responses does not adequately summarise the comments they submitted. Copies of the original representations were attached to the email sent.

They do not agree with the methods used in attempting to gain planning permission, particularly in relation to the importation of material, and definition and evidence of existing development. However, they do not oppose the application. Whilst they agree that all planning applications made should be considered on an individual basis, they do not feel that the issue of flood plain and suitability for development can be viewed in isolation, as the edge of the flood plain does not lie naturally on a field boundary. Although the water volume compensation scheme proposed may satisfy the Environment Agency and Internal Drainage Board (IDB), ultimately this will not affect the overall water level on the site or in the surrounding area.

They state that by granting planning permission you are effectively agreeing that:

- The flood risk assessment provided by the applicant is a true reflection of water levels and likely flood risk. You accept that the Environment Agency map is incorrect in this area, and that the applicant's report combined with an approved development will effectively set a new water reference level as a guide future development.
- You agree that raising ground levels through importation of new material and/or movement of material within the site is acceptable and can take place prior to and during the planning application and decision process.

Additional Comments

Flood Compensation Scheme

As stated in the report, the IDB have not objected to the application and have agreed the flood compensation measures. The scheme that has been agreed has shown flood volumes to be balanced on a level for level balance and a direct route for the flood waters to flow.

1025sqm of land will be raised from 48.60m AOD to 48.80m AOD and 1425sqm of land will be raised from 48.80m AOD to 49.00 AOD. In terms of excavated land 1450sqm of land elsewhere on the farm would be lowered from 49.00m or above to 48.80m and 1150sqm of land would be lowered from 48.80m AOD to 48.60m AOD.

Land north of the proposed site

During the Committee Site Visit Members raised a query regarding the siting of the proposal and what was happening to the land immediately north of the access road (opposite the proposed site – adjacent to the stable area). Prior to the application being submitted this land was owned by a third party and not under the ownership of the applicant, and therefore the proposed scheme was drawn up on the southern side of the access road. The land to the north of the access road is now under the ownership of the applicant; however, given the IDB access requirements, the width of this piece of land would not be sufficient to accommodate the proposed pitches.

Additional/Amended Conditions/Reasons

None

Item 8 (Pages 33-47) – CB/15/04884/FULL – Land adjacent to Unit 22 Pulloxhill Business Park, Greenfield Road, Pulloxhill

Additional Consultation/Publicity Responses

Pulloxhill Parish Council has responded to the reconsultation as follows:

“Further to our response to the original application, we would like to additionally comment as follows.

We welcome the withdrawal of the application related to the site adjacent to Unit 14. This will mitigate some, but by no means all of the nuisance caused to nearby residents. We are also concerned at the amount of mud and debris being carried onto the highway from the site.

All our other previous comments remain valid as concerns relating to the revised application.”

Objections to the revised application have also been received from Unit 17 and Units 21, 15 & 16 Pulloxhill Business Park, 12 & 24 Maple Close and 33 High Street as follows:

- The revisions to the proposal has not changed our opinions on the proposal;
- The proposal would lessen noise impacts to some residents but increase it for others;
- Lorries coming through the High Street both day and night causes noise pollution and results in congestion and danger to users of the highway;
- The business park was designed for light industry and warehousing in a covered environment, not for open storage;
- The proposed site is larger than the original site and this will result in larger equipment being brought on site;
- The noise levels have increased significantly since the open storage started on the land adjacent to Unit 14 and the condition of the business park has deteriorated. Relocating the open storage will not help with these problems;
- Machinery is often loaded onto transporters which block the road;

In response to these comments, it should be noted that the usable site area of the proposed site is actually slightly smaller than the usable site area of the existing site.

Additional Comments

It is clarified that the description of the application should read: "Change of Use: of grassed area to storage for machinery/plant and parking for Unit 14 Pulloxhill Business Park" as set out in the report, rather than "Change of Use: of grassed area to storage for machinery/plant and parking for Unit 14 Pulloxhill Business Park. Temporary permission for five years" as stated on the index page of the agenda pack.

Additional/Amended Conditions/Reasons

None

Item 09 (Pages 49-84) – CB/15/04264/FULL – Location – Deans Farm, Billington Road, Stanbridge LU7 9HL

Additional Consultation/Publicity Responses

Pollution Prevention Officer

This application is for a B8/B1a class use and as such has the potential to impact on nearby residents although the nearest resident is some 15 metres or so from the boundary. The main concern for impacts on residents is noise and specifically from night time deliveries, but also from any associated plant, light and potential contamination issues.

With regards to noise, the submitted information along with discussions with the appointed acoustic consultant has resulted in some measures being proposed to mitigate noise from such activities. These measures include the erection of a barrier along the northern boundary, restrictions on parts of the site during certain hours, among others.

As a result of this, I have drafted some recommended conditions on noise for your consideration to ensure that the impact of the development does not cause loss of amenity at existing residential premises. In addition, I have recommended a condition on any lighting to be installed along with a couple of informatives for land contamination.

Potential Impact for Central Bedfordshire: (clearly state any potential impacts on Central Bedfordshire - i.e. if conditions not imposed)

If conditions are not imposed, then an unacceptable level of noise, and hence loss of amenity may be experienced by the nearest residential dwellings. This could also result in Public Protection receiving complaints from residents in the area with subsequent investigations and formal retrospective action where unacceptable levels of noise are witnessed.

Conditions Required: Without prejudice to any decision you shall make should you be mindful to grant permission against the recommendations of Public Protection I ask that the following conditions are inserted on any permission granted.

- The development site shall not be used until a noise attenuation barrier has been erected along the northern boundary in accordance with the submitted Cass Allen acoustic report dated November 2015. The barrier shall be installed prior to the use commencing and be maintained thereafter.
- No development shall commence until a Service Yard Management Plan has been submitted to and approved in writing by the Local Planning Authority. Such a management plan shall identify measures to control noise emanating from the service yard. Delivery management shall be implemented in accordance with the approved plan at all times.
- Noise resulting from the use of the plant, machinery or equipment shall not exceed a level of 5dBA below the existing background level plus any penalty for tonal, impulsive or distinctive qualities when measured or calculated according to BS4142:2014.
- Details of any external lighting to be installed on the site, including the design of the lighting unit, any supporting structure and the extent of the area to be illuminated, shall be submitted to and approved in writing by the Local Planning Authority prior to the development commencing. Only the details thereby approved shall be implemented.

Reason: To protect the amenity of nearby residential dwellings.
(Policy BE8, SBLPR and section 7,NPPF)

Informatives

During construction works, a watching brief should be undertaken including a visual and olfactory appraisal of the underlying soils. If during construction works any material is noted to show visual and/or olfactory signs of contamination, including the possible presence of asbestos within the soils, then an environmental specialist should be consulted and investigations submitted to the Local Planning Authority for the purposes of assessment with regard to Part IIa of the Environmental Protection Act 1990.

There is a duty to assess for Asbestos Containing Materials (ACM) during development and measures undertaken during removal and disposal should protect site workers and future users, while meeting the requirements of the Health and Safety Executive.

Tree and Landscape Officer

Response to additional information submitted by the applicant's agent :

The building is confirmed as being visible from the Leighton Buzzard A505 bypass, and that the new building would be the only new development visible along this road,

setting a precedent for further development close to the highway boundary, which could result in an eventual character change to the whole road.

Landscape Planner

It would have been helpful if the applicant had provided the visual analysis earlier as it is very useful. It is disappointing that views from Totternhoe Knoll haven't been included given this is a historic monument and a well known and well used viewing point – the potential visual impact of the proposed development from this view especially is a concern.

I remain concerned about the potential detrimental visual impact of the proposed built form:

- As per the visual analysis provided; local planting structures in summer time provide fair screening of the existing development but the proposed built development is of a generally higher and greater mass and visual impact in summer months remains a concern.
- Existing local planting to the site and surrounds in winter time is far less effective in screening existing development and this increases my concerns on potential negative visual impact of a large unit on local views and local landscape character.
- The proposed landscape mitigation to the site periphery is linear / narrow; I would recommend much deeper treed shelter belts would be required to assist in mitigating the height and mass of the unit but this would take time – potentially 10+ years before achieving any significant height, Andy may be able to advise further on this.

The potential impact of lighting at night time and winter evenings remains a concern.

I also reiterate close board fencing on to the public realm is not acceptable.

If the application were to be progressed please could materials / finishes and boundary treatments be conditioned along with a detailed landscape and landscape management plan.

Additional Information

The applicant's agent has submitted a comparative analysis of the size of the development proposed vis-a-vis the existing and previous approval, additional landscaping details attached and an explanatory note summarised below, in response to the comments made by the Landscape Officer and the Parish Council.

As requested, the drawings show long distance winter and summer views of the site but we have also included a very useful drawing that shows the site in its local context; this includes a number of urbanising features but without the design and mitigating landscaping proposed as part of the current application at Deans Farm.

Quartet have also amended the landscape principles drawing to show additional and more mature planting to the northern boundary, incorporating a mix of evergreen and deciduous planting. The effect of this and other planting proposed will assist in satisfactorily mitigating the landscape impact of the proposal.

Additional Conditions and Informatives :

Traffic Routeing Management Plan

The site shall not be brought into use unless and until a Freight Management Plan for vehicles associated with the development hereby approved has been submitted to and approved in writing by the Local Planning Authority. The Freight Management plan is to be implemented throughout the operational life of the site and the occupier shall use all reasonable endeavours to inform HGV drivers of the routes as may be specified in the approved Plan including within the Plan details of the following:

- Timetable for implementation of measures designed to mitigate the impact of HGV traffic on local roads.
- Recommended routes for HGV's travelling to/ from the site.
- Information to be provided to employees and visitors detailing appropriate routes.
- Plans for monitoring and review, and potential mitigation measures should drivers fail to comply with the approved plan.

The development shall thereafter be implemented in strict accordance with the approved Plan.

Reason : In the interests of preserving residential amenity within the surrounding villages and to prevent road congestion and general disturbances to the other users of the local roads which are not appropriate for use by HGV traffic. (Section 4, NPPF and the CBC adopted Local Transport Strategy)

Noise mitigation measures

As per the Pollution Prevention Officer's recommendation.

Amended Conditions

18. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers 1572-01, 1572-02, 1572-03, 17372-Sk03_A, 17372-Sk04_A, 17372-Sk05_D, 17372-

Sk06_A, 17372-Sk07_A, 17372-Sk08_B, 17372-Sk09_D, 17372-Sk10_D & 17372-Sk11_B, 17372-Sk14, 0733/01Rev.A and QD680_100_03C.

Item 10 (Pages 87-92) – CB/15/04667/OUT – Location – Borderlands, Heath Park Road, LU7 3BB)

Reasons for Call In (Page 87) :

Please note that the site is not within the Conservation Area but in an Area of Special Character.

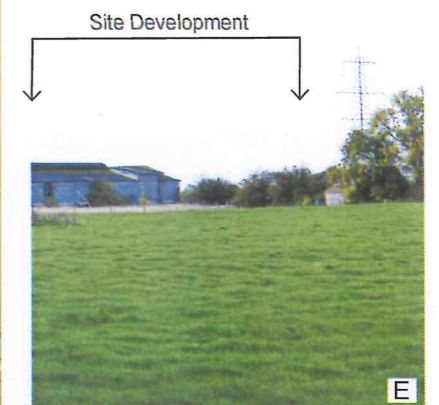
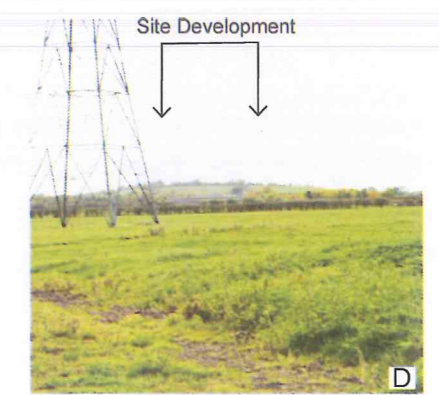
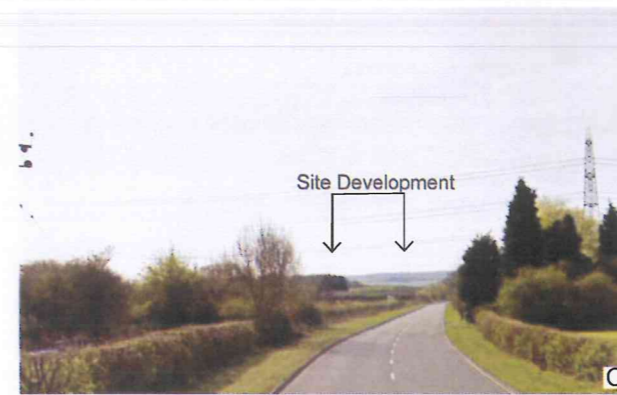
Item 011 (Pages 93-104) – CB/15/04821/FULL – 15 Torquay Close, Biggleswade, SG18 0FS

Internal dimensions for clarity:

- the internal width of the existing garage is 2.75 metres wide (measured pier to pier); and
- the internal width of the proposed enlarged garage is 2.75 metres wide (measured pier to pier).

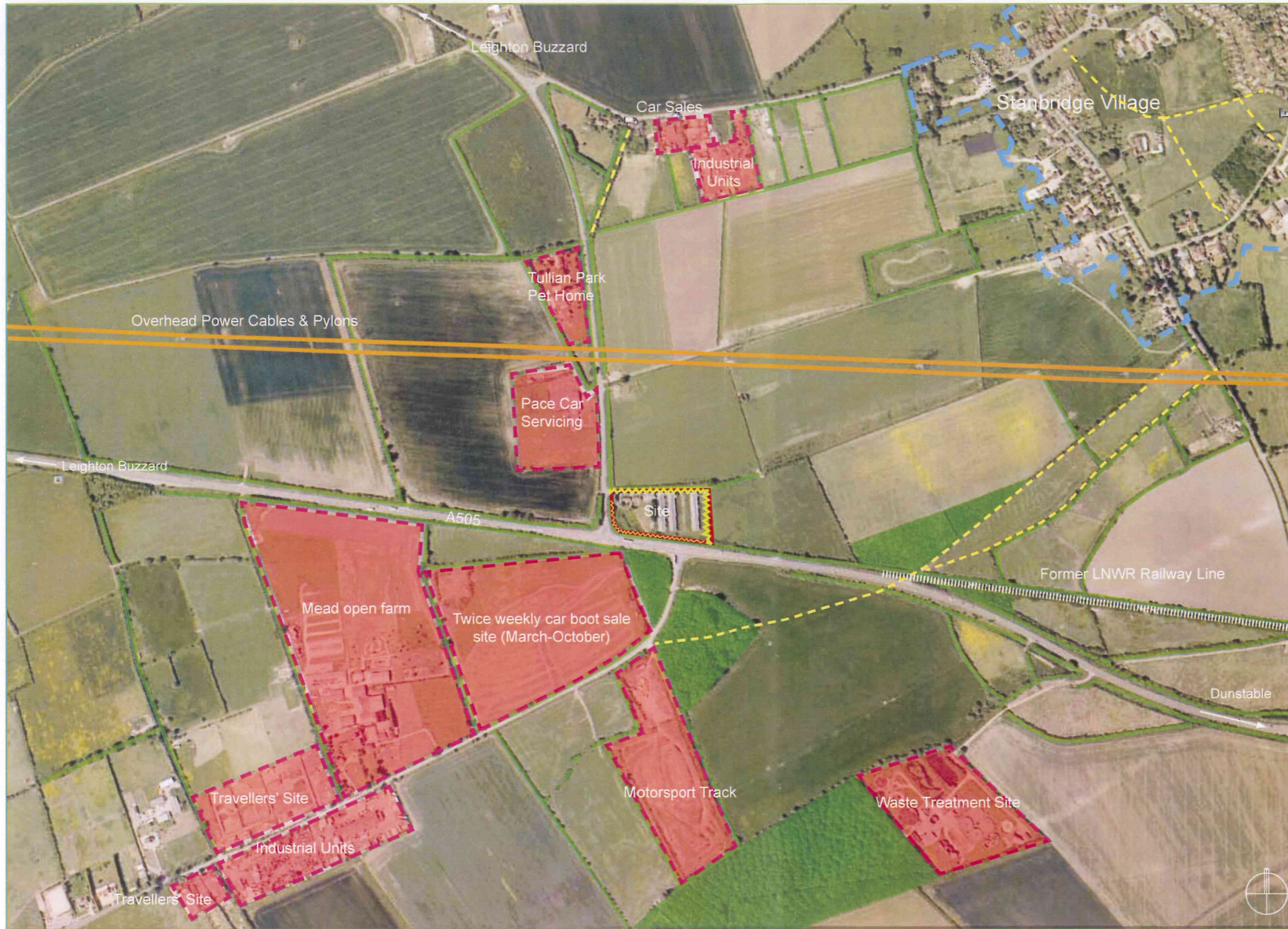
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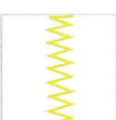





KEY	
	Principle Elements Existing Vegetation
	Existing Contours
	Views of Site
	Limited Views of Site
	No Views of Site
	Overhead Power Cables & Pylons

PROJECT		
Stanbridge Crossing		
CLIENT		
Brickhill Properties		
DRAWING		
Long Distance Visual Analysis- Late Summer		
SCALE	DRWG No.	DATE
NTS	QD680_100_01.01	20.10.15
© COPYRIGHT 2015 QUARTET DESIGN		

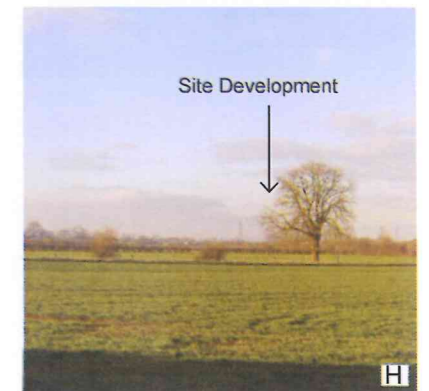
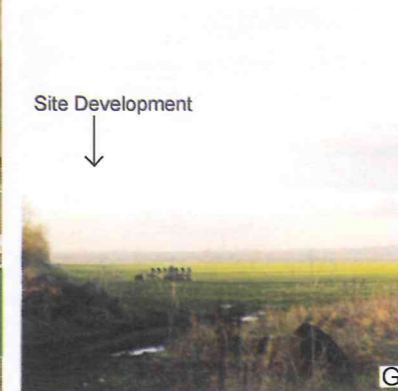
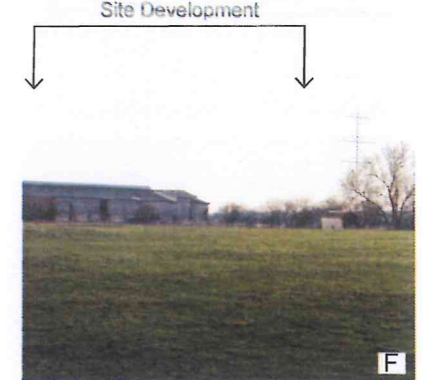
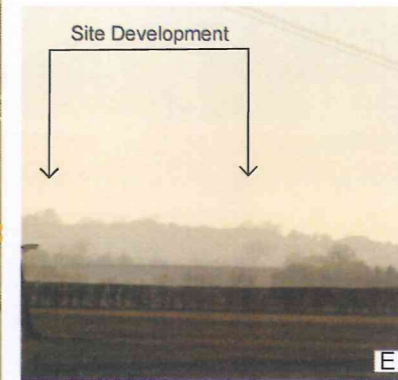
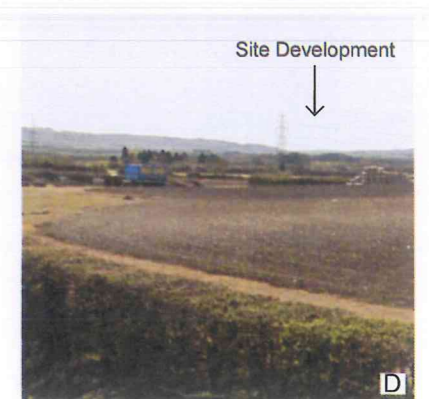
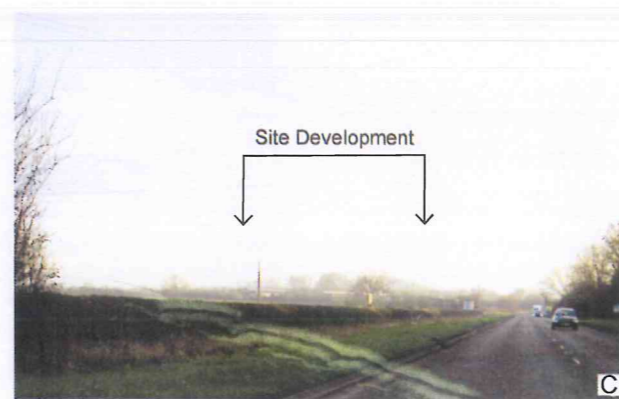
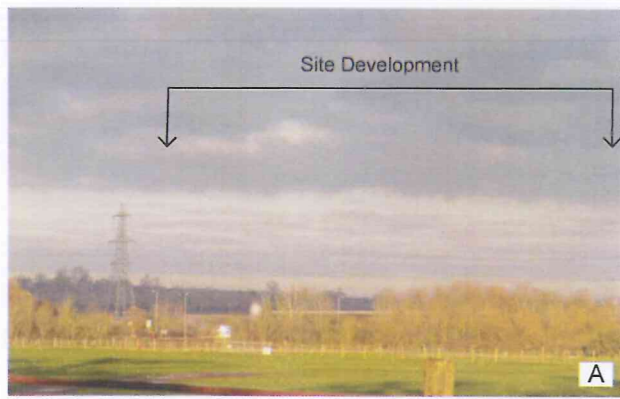


KEY

-  Site Boundary
-  Commercial/Industrial Activity
-  Hedgerows and Vegetation that could impact on the visual mitigation of the site
-  Woodland & Significant Vegetation
-  Locations of Landscape Visual Mitigation
-  Overhead Power Cables & Pylons
-  Public Footpaths
-  Approximate Village Outline (Main Residential Zone)

PROJECT		
Stanbridge Crossing		
CLIENT		
Brickhill Properties		
DRAWING		
Local Context/ Mitigation		
SCALE	DRWG No.	DATE
NTS	QD680_100_02_Rev A	21.01.16
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KEY

- Principle Elements Existing Vegetation
- Existing Contours
- Views of Site
- Limited Views of Site
- No Views of Site
- Overhead Power Cables & Pylons

PROJECT		
Stanbridge Crossing		
CLIENT		
Brickhill Properties		
DRAWING		
Long Distance Visual Analysis - Winter		
SCALE	DRWG No.	DATE
NTS	QD680_100_01.02	20.10.15
© COPYRIGHT 2015 QUARTET DESIGN		

CB/15/04264

Quantitative comparison of existing, past approved and proposed development

Deans Farm / Miniclipper, Leighton Buzzard

Scheme	Height to Eaves (m)	Height to Ridge (m)	Finished Floor Level (m)	Floorspace (sq m)	Building Footprint(s) (sq m)
Revised	10.5	12	92.50	4,994	2,184 (main building) 2,150 (canopy) 346 (office)
Proposed	13.2	14.7	92.50	4,994	2,184 (main building) 2,150 (canopy) 346 (office)
Pre-app	N.a.	12	N.a.	4,967	2,122 (main building) 2,165 (canopy) 346 (office)

06 JUL 2015

Proposed Development
at
Paradise Farm, The Causeway,
Clophill, Beds. MK45 4BA

Flood Risk Assessment

July 2015

Graham A. Fryer BSc CEng FICE FCIWEM
Consulting Engineer

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FLOOD RISK ASSESSMENT

Paradise Farm, The Causeway, Clophill, Beds. MK45 4BA

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1. **INSTRUCTIONS**

- 1.1 I was appointed by Mr. Michael Gumble to prepare a Flood Risk Assessment for a site at Paradise Farm, The Causeway, Clophill, Beds MK45 4BA
- 1.2 The FRA has been prepared in support of a planning application to be submitted to Central Bedfordshire Council for the use of the land as a gypsy caravan site. The location of the site is shown on the plan below and on the aerial view on the following page.

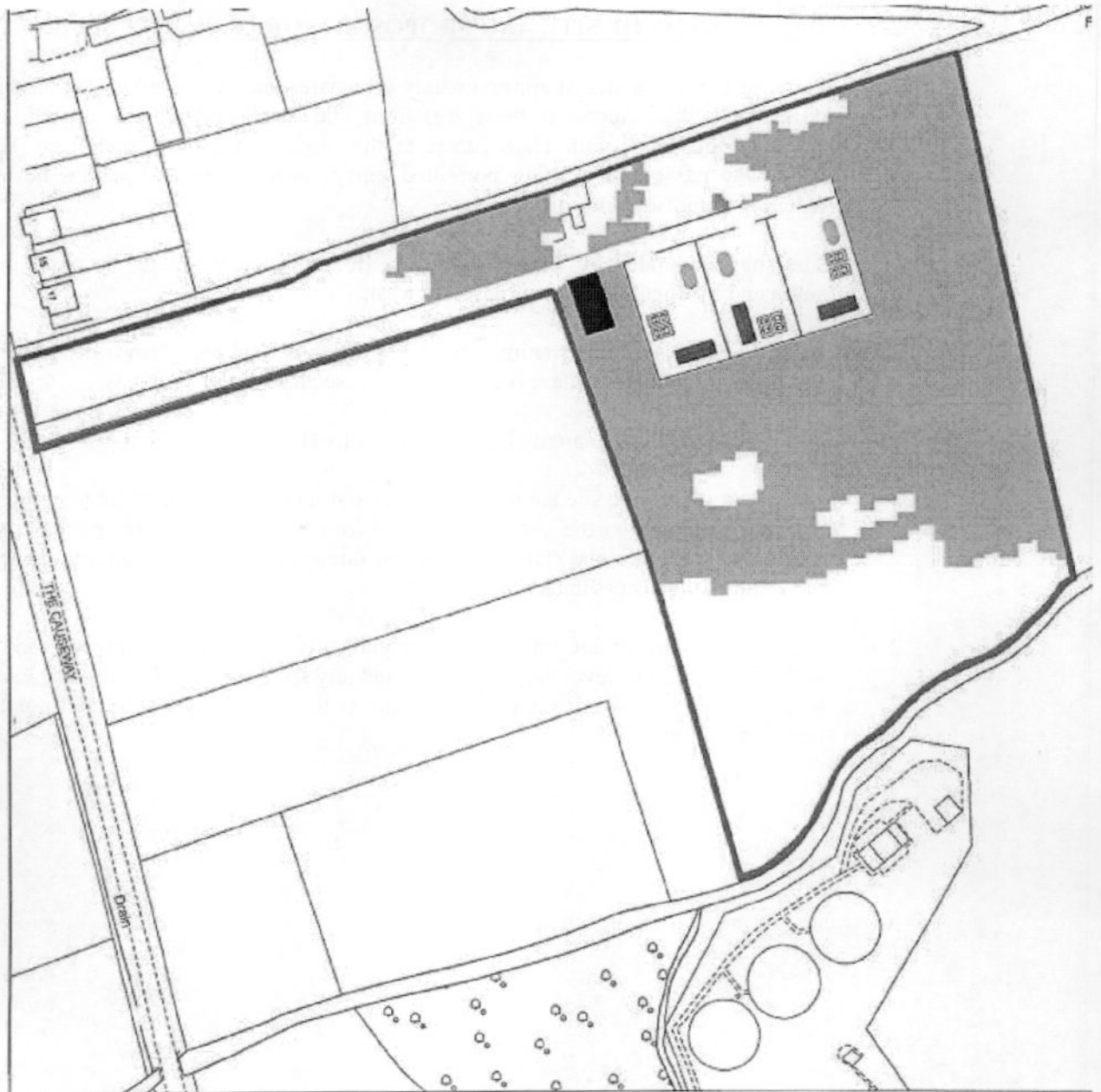




- 1.3 This report considers the flooding risk associated with the site in the light of National Planning Policy Framework and Technical Guidance. It establishes the flood risk at the site, ascertains the impact of development of the site on that flood risk and its affect on others and determines any mitigation measures which may be required to take account of the flood risk

2. **DESCRIPTION OF SITE AND PROPOSED WORKS**

- 2.1 Paradise Farm is a site of approximately 2 hectares and is located on the eastern edge of Clophill. Access to the site is from The Causeway, which connects the A507 to the south with High Street to the north. An access road from The Causeway passes an existing permitted gipsy caravan site and stables before reaching Paradise Farm.
- 2.2 The site is bounded by Internal Drainage Board watercourses to the north and south and by open fields to the east and west.
- 2.3 Paradise Farm is a former animal sanctuary which is now being renovated. At the northern end of the site there is an existing house and 3 static caravans.
- 2.4 Photographs of the site are included as Appendix B to this document.
- 2.5 The proposals for the site are to replace the existing static caravans and to upgrade the site, as shown on the site plan on the following page. The three pitches will each have space for one static caravan and one tourer on a hardstanding area to the south of the access track.
- 2.6 The site is currently uneven, and it rises gradually to the south. Some regrading will be necessary to level the living area, and any spoil required for this regrading will be taken by lowering the higher areas at the south of the site, and not by importing fill material.



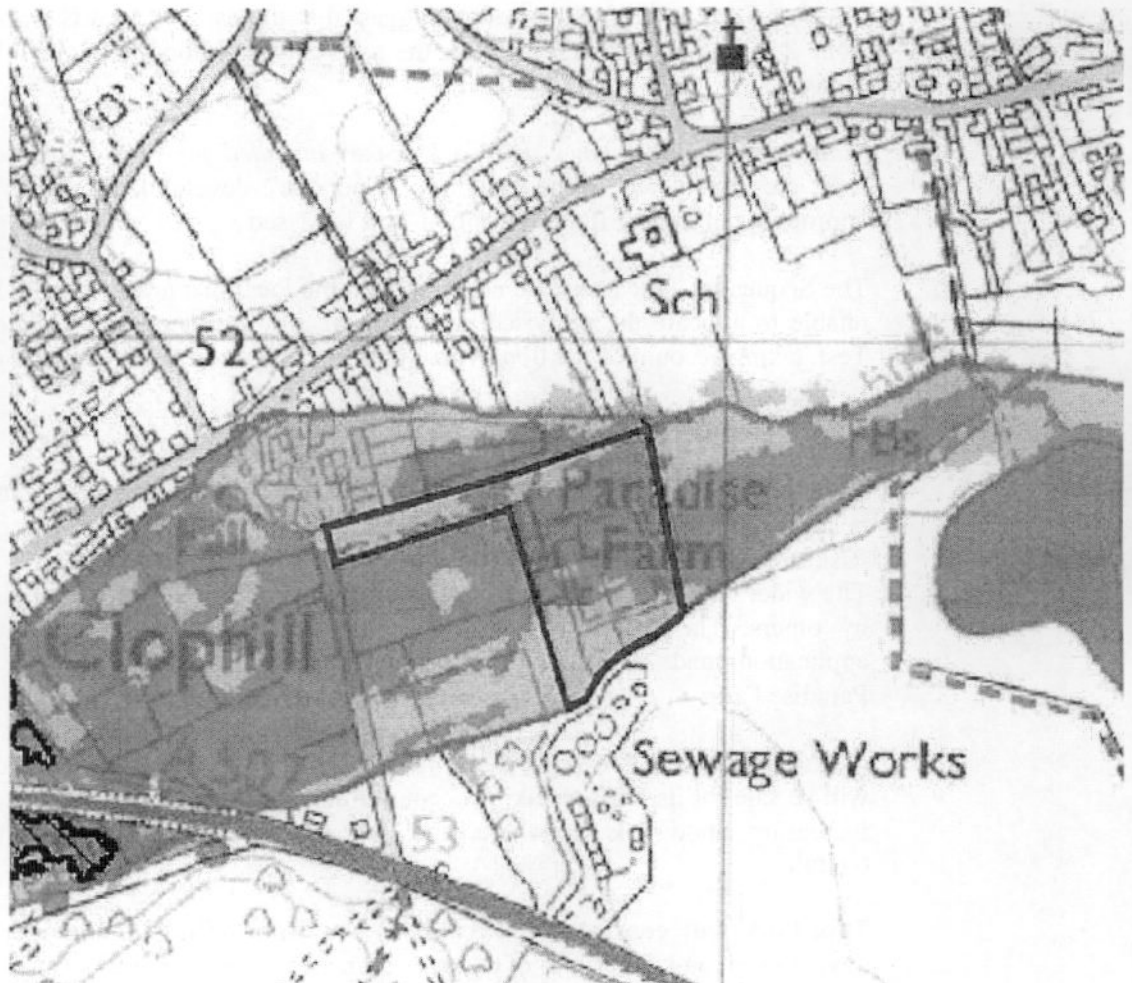
3. **NATIONAL PLANNING POLICY FRAMEWORK**

- 3.1 The NPPF, March 2012, is a key part of the Government's reforms to make the planning system less complex, more accessible, and to promote sustainable development. It replaces most of the Planning Policy Guidance Notes (PPG's) and Planning Policy Statements (PPS's)
- 3.2 The underlying principle in the NPPF is a presumption in favour of sustainable development promoting positive planning, where Local Planning Authorities should approve without delay proposals that accord with the development plan.
- 3.3 Flood risk and coastal change policies can be found in paragraphs 94, 100 – 108 of the NPPF with technical guidance setting out how these policies should be implemented contained in the *Technical Guidance to the National Planning Policy Framework* also dated March 2012.
- 3.4 Local Planning Authorities should “*adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change, and water supply and demand considerations*”(Para 94)
- 3.5 Government policy is that:“*inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere*” (Para 100).
- 3.6 Local Plans “*should be supported by strategic flood risk assessment and develop policies to manage flood risk, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards*” (Para 100).
- 3.7 The NPPF retains the Sequential and Exception Tests. In drawing up Local Plans, LPAs “*should apply a sequential, risk based approach to the location of development*” (Para 100).
- 3.8 Planning applications in flood risk areas should be supported by a site-specific flood risk assessment. This should demonstrate that
- “*within the site the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location, and*
 - *Development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including emergency planning, and it gives priority to the use of sustainable drainage systems*”(Para 103).

- 3.9 The *Technical Guidance to the National Planning Policy Framework* retains key elements of Planning Policy Statement 25 and of the Minerals Policy Statements and Minerals Planning Guidance Notes which are considered necessary and helpful in relation to these policy areas. The retention of this guidance is an interim measure pending a wider review of guidance to support planning policy.
- 3.10 With regard to flood risk –
- “areas at risk of flooding” means land within Flood Zones 2 and 3 or land within Flood Zone 1 which has critical drainage problems and which has been notified to the local planning authority by the Environment Agency.
 - “flood risk” means risk from all sources of flooding – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.
- 3.11 Table 1 of the Guidance Notes deals with the definition, appropriate uses, flood risk assessment requirements, and policy aims of the 4 flood zones –
- | | |
|-----------|---------------------------|
| Zone 1 – | Low Probability |
| Zone 2 – | Medium Probability |
| Zone 3a – | High Probability |
| Zone 3b – | The Functional Floodplain |
- 3.12 Table 2 of the Guidance Notes contains the Flood Risk Vulnerability classification.
- 3.13 Table 3 of the Guidance Notes contains the Flood risk vulnerability and flood zone compatibility data.
- 3.14 Section 6 of the Guidance Notes refers to a site-specific flood risk assessment which is carried out by, or on behalf of, a developer to assess the risk to a development site and demonstrate how flood risk from all sources of flooding to the development itself and flood risk to others will be managed now, and taking climate change into account. There should be iteration between the different levels of flood risk assessment.
- 3.15 It should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed so that the development remains safe throughout its lifetime, taking climate change into account. Those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment

4. **FLOOD RISK INFORMATION**

- 4.1 The Floodmap currently published by the Environment Agency for this area is shown below. The dark blue area shows the extent of the floodplain taking account of flood defences, and it represents the contour of the flood which has a 1 in 100 or greater annual probability of flooding (i.e. greater than 1%). The light blue represents the additional area having a 1 in 1000 or greater annual probability of flooding (i.e. greater than 0.1%).



- 4.2 It can be seen that according to the current Agency floodmap the centre of the site is within the 1% flood contour but the whole of the southern part of the site, some small areas to the north, and most of the access track are within the 0.1% contour

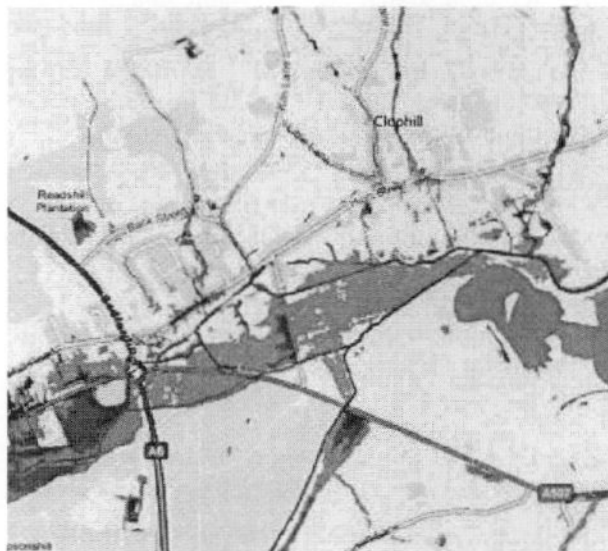
- 4.3 The watercourses to the north and south of the site are the responsibility of the Bedfordshire & River Ivel Internal Drainage Board, so I have also contacted the IDB for detailed flood levels and information at this site. The response received from the IDB is included as Appendix A to this FRA. It shows that the flood plain of the IDB watercourses 156 and 175 is the same as indicated on the Environment Agency published floodmap.
- 4.4 No modelled flood levels or Historic Flood outlines are available from either the Environment Agency or the Internal Drainage Board.
- 4.5 The flood outlines would therefore suggest that the caravan area is within Flood Zone 2 – Medium Probability, after the regrading described in para 2.6 has been carried out.
- 4.6 “*Caravans, mobile homes and park homes intended for permanent residential use*” are considered to be “Highly Vulnerable” development, which is only appropriate in Zone 2 if the Exception Test is passed
- 4.7 The Sequential Test would demonstrate that the local planning authority has been unable to allocate the proposed development in accordance with the Sequential Test, taking account of the flood vulnerability category of the intended use.
- 4.8 For the Exception Test to be passed –
- (a) It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared.
The wider benefits of the development as a gipsy traveller site will be dealt with by others. The matter has already been considered, and accepted, for the application made for the existing gipsy caravan site on the access track to Paradise Farm
- (b) A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- This FRA will consider (in Section 5) the vulnerability of the users of the development and the effects of the development on flood risk elsewhere.
- 4.9 The availability of safe access for residents is considered in Section 7.
- 4.10 The Environment Agency data also shows that the site is not at risk of flooding from “reservoirs or other artificial sources”.

5. **FLOODPLAIN STORAGE AND CONVEYANCE**

- 5.1 The physical effects on others resulting from development within the floodplain principally consist of the loss of floodplain storage – requiring floodwater to move elsewhere – and obstructions to flow which can restrict conveyance and cause increases in water levels behind the restriction.
- 5.2 There are 3 existing static caravans on the site, and the proposal is to reposition and replace these. The new caravans will be set with their thresholds raised sufficiently above flood level to ensure that the residents remain safe. They will also be securely tethered so that they are stable in a major flood event.
- 5.3 As described in para 2.6 any regrading of the site will involve the movement of spoil from the south part of the site to the proposed caravan area to the north, which will provide level for level compensatory storage.
- 5.4 With these conditions there can be no loss of flood storage and no effect on flood conveyance, there is therefore no increase in the flood risk to others as a result of the proposed works

6. SURFACE WATER DRAINAGE

- 6.1 A caravan site does not adversely affect the surface water drainage in the area. Only the small areas of the mobile home supporting slabs are impermeable, and all surface water continues to be discharged directly to the ground. The hardstandings will be totally permeable.
- 6.2 The Environment Agency “Risk of flooding from Surface Water” plan, shown below, repeats the flooded area from the floodmap and therefore raises no additional issues.



7. **SAFE ESCAPE AND EMERGENCY SERVICES**

- 7.1 The Technical Guidance require the effects of introducing further persons into the floodplain to be evaluated, both in terms of the opportunities for safe escape and the implications for the Emergency Services.
- 7.2 Since the static caravans themselves are elevated above flood level there is no direct danger to the occupants.
- 7.3 The proposed caravan area is outside the limits of the 1% design flood so that safe escape is possible, this has already been discussed and accepted for the permitted caravan site on the access track, as follows –

Area to be assessed	The Causeway
Depth of flooding (d)	Maximum 150 mm (from surveyed levels)
Velocity of flow (v)	Say 0.5 m/sec (ponded water on flood limits)
Debris factor (DF)	0.5 (Depth below 250 mm)

$$\begin{aligned} \text{Flood Hazard Rating HR} &= d \times (v+0.5) + DF \\ &= 0.65 \end{aligned}$$

This value of HR is within the range in the Tables of FD2320 for which the Degree of flood hazard is *Very Low Hazard - Caution*

8. **CONCLUSIONS**

- 8.1 This FRA refers to a planning application for the use of a former animal sanctuary on the east side of Clophill as a 3 pitch gipsy caravan site, The site already contains 3 static caravans, which would be replaced and repositioned. There is an existing permitted gipsy site on the access track to Paradise Farm.
- 8.2 The site is uneven, and rises gradually to the south. Some regrading will be necessary to level the living area, and spoil required for this regrading will be taken from the higher areas, and not by importing fill material.
- 8.3 The site is bounded by Internal Drainage Board watercourses to the north and south and by open fields to the east and west.
- 8.4 According to the current Environment Agency floodmap the centre of the site is within the 1% flood contour but the whole of the southern part of the site, some small areas to the north, and most of the access track are within the 0.1% contour. This has been confirmed by the IDB.
- 8.5 The caravan area will be within Flood Zone 2 – Medium Probability, after the regrading has been carried out.
- 8.6 “Caravans, mobile homes and park homes intended for permanent residential use” are considered to be “Highly Vulnerable” development, which is only appropriate in Zone 2 if the Exception Test is passed. The wider benefits of the development as a gipsy site have already been considered, and accepted, for the application made for the existing gipsy caravan site on the access track to Paradise Farm
- 8.7 The new caravans will be set with their thresholds raised above flood level to ensure that the residents remain safe. They will also be securely tethered so that they are stable in a major flood event. Since they will replace existing caravans there can be no loss of flood storage and no effect on flood conveyance, there is therefore no increase in the flood risk to others as a result of the proposed work
- 8.8 A caravan site does not adversely affect the surface water drainage. Only the small areas of the caravan supporting slabs are impermeable, and all surface water continues to be discharged directly to the ground.
- 8.9 The caravan area is outside the limits of the 1% design flood so that safe escape is possible, this has already been discussed and accepted for the permitted caravan site on the access track for which the Degree of flood hazard is *Very Low Hazard - Caution*

APPENDIX A

INTERNAL DRAINAGE BOARD RESPONSE

graham fryer

From: Trevor Skelding <Trevor.Skelding@idbs.org.uk>
Sent: 30 June 2015 15:50
To: gfryer@talktalk.net
Subject: RE: Land adjacent to 17, The Causeway, Clophill, MK45 4BA
Attachments: Causeway.pdf

Graham

Please find attached a plan indicating the Board's district and flood zones 2 & 3 relative to your site. Currently I am unaware of any planned improvement works to the adjacent watercourses.

Regards

Trevor Skelding MSc IEng MICE
Principal Engineer
The Bedford Group Of Drainage Boards
01234 767995

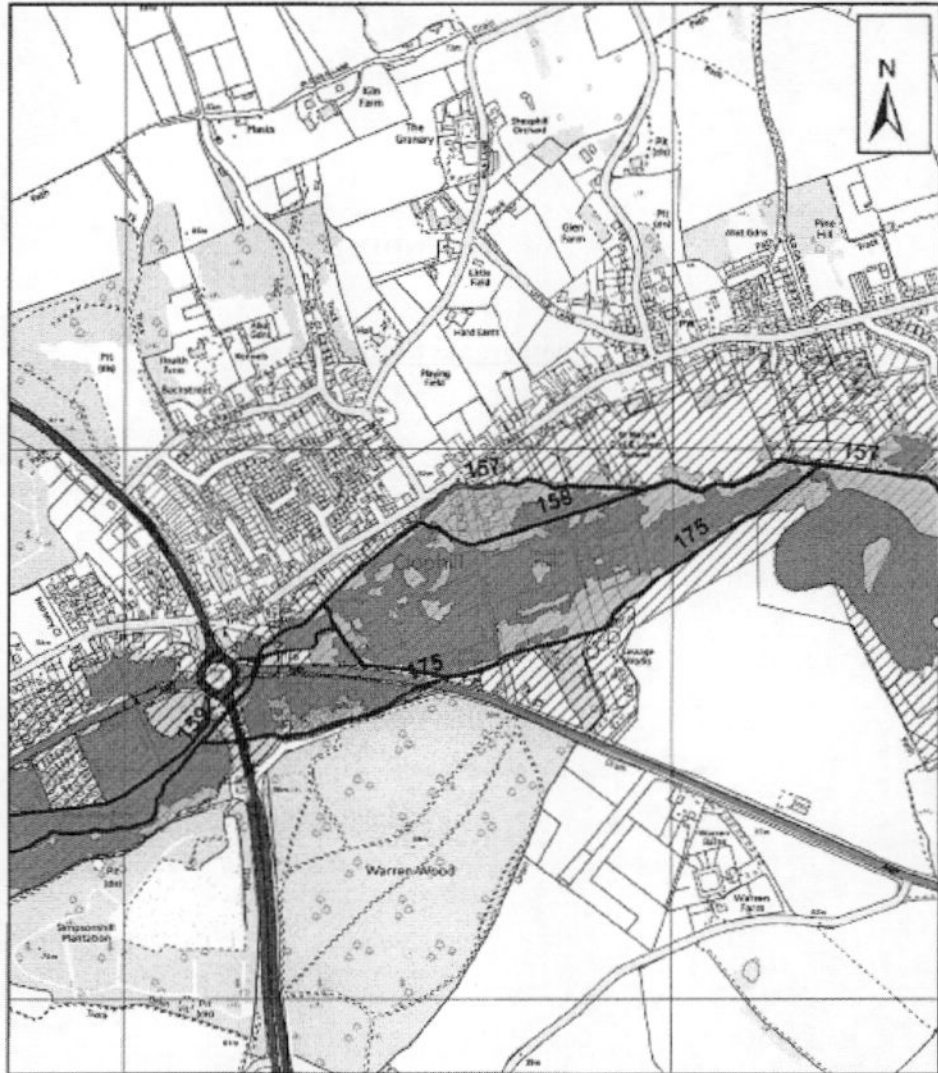
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1

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Bedford Group of Drainage Boards
Bedfordshire & River Ivel IDB

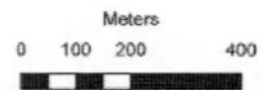


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Scale 1 = 10,000

Legend

- IDB Watercourse
- Flood Zone 3
- Flood Zone 2
- IDB District**
- BOARD**
- ▨ Bedfordshire and River Ivel



The Causeway

www.idbs.org.uk

APPENDIX B

Photographs of Existing site



Photo No 1

Access track to The Causeway, with existing house and static caravan

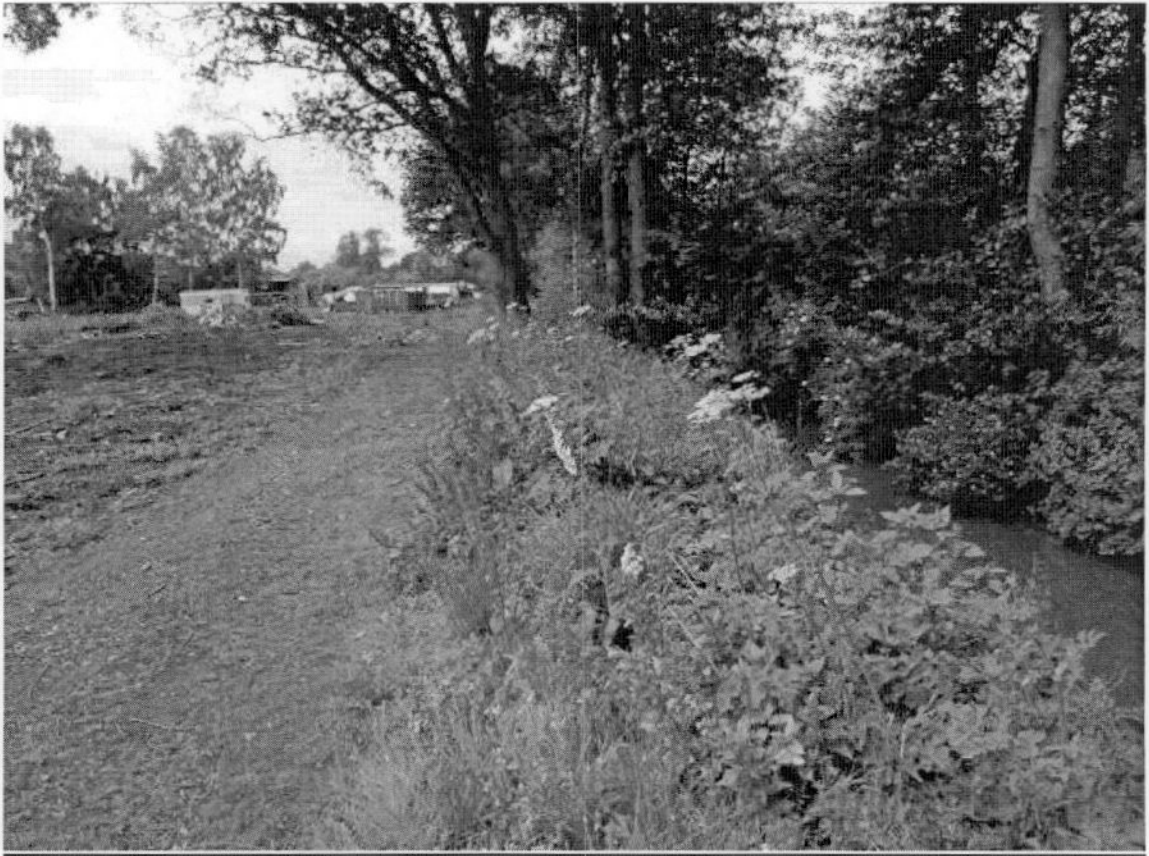


Photo No 2

View of the site and the river, looking west



Photo No 3

View of the site, towards higher ground to the south

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