

Scott Jackson  
North Lincolnshire Council  
Development Control  
Civic Centre Ashby Road  
Scunthorpe  
DN16 1AB

**Our ref:** AN/2024/135732/02-L01  
**Your ref:** PA/2024/634  
**Date:** 09 January 2025

Dear Scott

**Planning permission to demolish a bungalow and erect three dwellings  
1 Station Road, Gunness, Scunthorpe, DN15 8SU.**

Thank you for re-consulting us on the above application on 11 December 2024.

**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.

**Reasons**

The submitted FRA (compiled by EWE Associates Ltd, referenced: 2024/3109 RevA, dated December 2024) 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 proposes inadequate raised finished floor levels.

The site is within 500m of the river Trent defences and has a critical flood level of 3.8 metres above Ordnance Datum (AOD). The North and North East Lincolnshire [Strategic Flood Risk Assessment \(2022\)](#) states that finished floor levels should be set 300mm above the critical flood level (CFL), or the calculated breach level.

The submitted amended FRA has calculated a breach level of 3.93mAOD. We consider that the breach levels on the site are likely to be lower than calculated in the FRA, at a similar level to the CFL. Therefore, we require finished floor levels to be 300mm above the CFL.

The FRA states that the habitable internal ground floor levels of the buildings are only elevated to 3.8mAOD. This provides no freeboard above the CFL and is below the breach level identified in the FRA.

We also note that there are inconsistencies between the proposed finished floor levels stated within the FRA (3.8mAOD) and shown on two of the dwellings in the latest Site Plan ('00-00\_051 C'), and those shown on the latest (September) Planning Sections (4.1mAOD in drawings: '02-01\_350 A' '02-02\_351 A' and '01-03\_352 A').

The section drawings also show that bedrooms are located on the ground floor of the

dwellings, which is contrary to mitigation measures proposed in section 5 of the FRA which states: 'No bedrooms will be permitted at ground floor level.'

**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. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving your consultation.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me using the details below.

Yours sincerely

**Miss Emily Fisher**  
**Planning Advisor**

