

Development Plans Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
Cumbria  
LA9 4DL

**Our ref:** NO/2017/109701/PO-  
01/SB1-L01

**Your ref:**

**Date:** 30 January 2018

Dear Sir

### **Grange-over-Sands Neighbourhood Plan - Submission Consultation**

Thank you for consulting the Environment Agency on the submission version of the Grange-over-Sands Neighbourhood Plan. We have reviewed the document and whilst we are overall supportive of the vision and objectives of the Neighbourhood Plan we wish to make the following comments:

#### **3.5 Flooding and Drainage**

*3.5.1 Grange-over-Sands is located in flood zones 2 and 3 of the Environment Agency's flood map. In addition, the Neighbourhood Plan area is vulnerable to flooding caused by surface water, ground water, springs and drainage issues during times of heavy rainfall.*

Suggest replace wording as follows:

Grange-over-Sands Parish lies mainly within Flood Zone 1 (low probability of tidal and fluvial flooding) as defined in the Environment Agency's Flood Map. Smaller areas are within Flood Zones 2 and 3 (i.e. medium and high probability of fluvial and tidal flooding).

In addition, some areas are vulnerable to flooding caused by surface water, ground water, springs and drainage issues during times of heavy rainfall.

#### **5.19 Community Aspiration**

We consider that this page of the document does not comply with the requirements of the National Planning Policy Framework and should be revised accordingly.

**5.19.1** We suggest that this paragraph is re-written to summarise the sequential approach to new development and flood risk as advocated in the NPPF. It should then

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state that where development in flood risk areas is exceptionally justified following application of the Sequential and Exception Tests then appropriate mitigation measures will be incorporated to ensure the development is safe from flooding for its lifetime without increasing flood risk elsewhere.

5.19.2 Development proposed in flood risk areas should be supported by a Flood Risk Assessment which is appropriate to the type and scale of development and complies with the requirements of the NPPF.

#### **5.19.5 Grange over Sands South**

There are few open channels here and the railway embankment provides an estimated 1 in 200 year annual probability standard of protection against tidal flooding. Consequently, an area of land on the landward side of the embankment is defined as Flood Zone 3 (high risk of tidal flooding) and is an area benefitting from defences (ABD).

Localised drainage issues have been identified at Cart Lane, where flooding from a small watercourse is believed to be related to a submerged flap valve on a pipe which discharges at the coast.

Localised problems near Granby Road, Priory Lane, Kirkhead Road, Kentsford Road and the area around Kents Bank Station.

**5.19.6** Therefore, the Town Council will continue to seek solutions to localized flooding issues in line with National and Local Policy as well as National Flood Guidance.

This completes our response, please contact via [REDACTED]  
[REDACTED] should you wish to discuss our comments further.

Yours faithfully

**Jeremy Pickup**  
**Planning Advisor - Sustainable Places**

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