

Project:	AEG03106_LE67_Thornton_01		
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Clovelly, Merrylees Road, Thornton, Coalville, LE67 1AP

Aegaea were previously commissioned to complete a Flood Risk Assessment to support the proposed development at the site above.

In response to the initial Flood Risk Assessment, the EA have provided a response which lists several considerations which the FRA, in their view, fails to meet. This addendum has been prepared and should be read in conjunction with the previous FRA (ref: AEG03106_LE67_Thornton_01) in order to address the concerns raised by the EA.

The EA have stated in their response the following;

The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- 1. consider how the 1 in 100 year plus 28% climate change event will affect people and property*
- 2. consider how people will be kept safe from the identified flood hazards*
- 3. consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event*
- 4. There is no assessment of the impact of climate change using 28% as the appropriate climate change allowance*

In response to the first and fourth point, the EA have previously been consulted on the planning application for the proposed development (ref: LT/2023/128028/01-L01). The EA have stated that they do not hold detailed flood modelling data for the site location and that the flood zones within the vicinity have been constructed using national scale hydraulic modelling.

As such, given that the ordinary watercourse adjacent to the site is represented in the EA's Risk of Flooding from Surface Water (RoFSW) modelling, the RoFSW data has been analysed as an approximation for analysing the fluvial flood risk from the ordinary watercourse. The EA have stated that a hydraulic modelling exercise could be completed for the ordinary watercourse, however given the small scale of the development, this is not considered to be commensurate with the size of the proposed development.

In response to the second and third points raised by the EA, mitigation measures have been recommended within the FRA which consider how people and property could be kept safe from the identified flood hazards. The mitigation measures mentioned include appropriate flood resilience and resistance measures such as;

- *Raising wiring and power outlets at ground level.*
- *Air brick covers to be installed (if applicable).*
- *Flood doors provided at entrances/exits.*
- *Provision of demountable flood barriers to be erected on receipt of an EA Flood Alert.*

The FRA also mentions throughout the analysis of the flood risk that the timber cabins include raised threshold levels which provide a level of mitigation against the analysed flood depths. It is noted that in the modelled 1.0%AEP event, Buildings A to F, and Building I are shown to be affected by flooding. Flood depths at the location of the affected buildings, inclusive of the raised threshold levels of the timber cabins, could range up to 0.59m. The DCLG report specifies that flood resistance measures can typically prevent ingress of floodwater to a depth of 600mm (0.01m above the analysed flood depths).

Additionally, the FRA recommends signing up to both the relevant Flood Warning Service (Rothley Brook and Quorn Brook in Leicestershire) and Met Office Severe Weather Warnings. The FRA then refers to the comprehensive flood risk assessment which Clovelly House School currently have in place. The assessment is reviewed annually unless circumstances or guidance changes. The risk assessment includes a comprehensive list of the potential hazards/risk associated with flooding of the site, and the controls and further actions required relating to each hazard/risk.

In summary, the risk assessment provided by the client includes control measures such as;

- Pre-preparing staff and pupils so that it is understood that there is a risk of flooding to the site;
- To inform taxi services if flooding occurs in order to evacuate the site;

- Cabins are to be used only during school times with no sleeping accommodation provided;
- Checking weather conditions regularly;
- Close the school for the day in the event of flooding;
- To encourage children and staff to remain on higher ground [within the school carpark] when the garden is flooded, and;
- Teach children about acceptable risk during flooding.

The list of controls is not exhaustive and is subject to annual review and updates.

A full copy of this risk assessment was submitted in Appendix B of the FRA, though this may not have been reviewed by the EA.

In addition to the comments above, the EA have further commented that the development proposes inadequate:

- *Flood storage compensation*
- *Raised finished floor levels*
- *Safe access and egress routes*

The FRA has addressed each of these points in turn stating that firstly, in response to the provision of Flood Storage Compensation;

'Each of the timber cabin buildings have been constructed on raised stilts with voids beneath in order to allow for the free flow of floodwater beneath each of the structures. As such, in isolation, the proposed development should not increase flood risk elsewhere.'

By constructing each of the timber cabins on stilts with an open void beneath, this may mean that the proposals do not increase flood risk elsewhere by allowing for the free flow of floodwater beneath each of the structures, and that Flood Storage Compensation may not be required.

Previously it is mentioned that each of the cabins have been constructed with raised threshold levels to provide mitigation against flooding, though further raising of FFLs is deemed unfeasible due to the nature of the proposals.

Safe access/egress routes and procedures are covered comprehensively in the school's full risk assessment which is included as Appendix B of the previous FRA.

As a final point of consideration, the school serves an incredibly important role within the local community, providing an education for hard-to-place students who thrive there. The safety of the students at the school is paramount to both the school and their staff, hence the rigorous risk assessment procedures which are currently in place.

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