Environment Agency

Our ref:	SO/2025/125124/03-L01
Your ref:	25/01764/OUT
Date:	10 September 2025

Cheshire West & Chester Council
Development Management
Council Offices (4) Civic Way
Ellesmere Port
Merseyside
CH65 0BE

Dear Sir/Madam

FRA REPORT (DOCUMENT 1/2) : OUTLINE PLANNING APPLICATION FOR THE ERECTION OF UP TO 110 RESIDENTIAL DWELLINGS (INCLUDING AFFORDABLE HOUSING), INTRODUCTION OF STRUCTURAL PLANTING AND LANDSCAPING, PUBLIC OPEN SPACE, SUSTAINABLE URBAN DRAINAGE SYSTEM AND ASSOCIATED WORKS (ALL MATTERS RESERVED EXCEPT FOR ACCESS).

LAND AT GRID REF 348876 359298 GREENLANDS TATTENHALL CHESTER

I write in response to your Authority's email of 27 August from your officer Rebecca Clark which responded to our previous letters of objection dated 30 July and 13 August 2025.

The Environment Agency have reviewed the following report:

- NPPF: Flood Risk Assessment & Outline Drainage Strategy:
- Land West of Tattenhall Road, Tattenhall
- Undertaken by enzygo environmental consultants
- SHF.1132.307.HY.R.001.A
- Dated April 2025

This has been reviewed in conjunction with the previously referenced appendices reviewed as part of our initial consultation.

In the absence of an adequate flood risk assessment (FRA) we **MAINTAIN AN OBJECTION** 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 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails propose suitable finished floor levels based on current freeboard guidance.

Section 6.7.1 of the FRA erroneously indicates a 300mm freeboard should be used on the JFLOW flood levels. As discussed in our previous response, JFLOW modelling does not provide a suitable level of confidence on which to inform design mitigations, and the undertaking of bespoke modelling would normally be expected to inform a development of this scale. Given however the marginal encroachment of the JFLOW extents into the site, we would however be willing to overlook this requirement should a more precautionary approach to levels be proposed. Current guidance requires that where robust modelling is not available, a 600mm freeboard is to be used and this should be used in this instance if basing levels on JFLOW information. Should the applicant wish to undertake their own modelling, a 300mm freeboard as currently proposed would be acceptable.

The FRA should also be revised to clearly state that built development will be wholly restricted below this level, rather than ‘limited’ as currently worded.

For further information, please see the following link:
Preparing a flood risk assessment: standing advice - GOV.UK

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

In particular, the applicant should consider the option of undergoing their own modelling exercise for approval by the Environment Agency for use on this site, or using the more conservative 600mm freeboard recommended in current guidance for sites without robust modelling data and high uncertainty.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Yours faithfully

Jane Field
Planning Specialist

Direct dial 02030250535
Direct e-mail jane.field@environment-agency.gov.uk