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HH  
**Environment  
Agency**

Mrs H Hobbs  
Waverley Borough Council  
Development Control  
The Burys  
Godalming  
Surrey  
GU7 1HR

**Our ref:** WA/2014/119273/02-L01  
**Your ref:** WA/2014/2127  
**Date:** 19 May 2015

Dear Mrs Hobbs

**Outline Planning Application, With All Matters Reserved Except Access, For The Erection Of 265 Dwellings And Formation Of Public Open Parkland, Together With Associated Works, Following The Demolition Of 2 Existing Dwellings, Glasshouses And Ancillary Buildings. This Application Affects A Public Footpath 393 (Includes A Section Of The Wey South Path) And Is Accompanied By An Environmental Statement.**

**Land At West Cranleigh Nurseries And North Of Knowle Park Between Knowle Lane And Alfold Road, Cranleigh**

Thank you for consulting us on the outline planning application noted above. Thank you for agreeing an additional timeframe for the provision of our comments. We apologise for the delay and for any inconvenience caused. We have reviewed the information submitted with regards to our remit. This includes:

- Knowle Park Initiative, Cranleigh – 'Sequential Test Assessment', project number 14053, dated October 2014 and prepared by Water Environment Limited;
- Knowle Park Initiative, Cranleigh – 'Flood Risk Assessment', project number 14053, issue: final, dated October 2014 and prepared by Water Environment Limited.

### **Environment Agency Position**

In accordance with the National Planning Policy Framework (NPPF), the associated National Planning Practice Guidance (NPPG) and local planning policy we **OBJECT** to the proposed development as submitted and recommend the refusal of planning permission for the reasons outlined below.

### **Objection Reason 1**

We object to this application because the Sequential Test information submitted with the application has demonstrated that there are reasonably available sites with less flood risk on which this development could proceed. We therefore recommend that the

application should be refused as the proposed development site does not comply with paragraphs 101 to 102 of the National Planning Policy Framework (NPPF).

#### **Further Comments – Objection Reason 1**

We acknowledge that a flood risk sequential test assessment has been submitted as part of the planning application documents.

However, it is not clear why the area of scope is restricted to the locality of Cranleigh rather than considering the entire Borough. Generally it applies to sites within the whole council borough and not restricted to land in the applicant's ownership. However, as noted in the NPPG reference ID 7-033-20140306 the area of scope for applying the flood risk sequential test may be more focused providing evidence is submitted to support this position. If the current reduced scope as indicated in the submitted 'Sequential Test Assessment' has been agreed in writing by Waverley BC and the applicant, then this should be included as part of the Sequential Test document and the formal planning application details.

NPPF paragraphs 101 to 102 state that new developments should be steered to areas with the lowest probability of flooding. Tables 1 and 2 (pages 4 and 6) of the submitted flood risk sequential document indicate that the proposed site is ranked 7<sup>th</sup> and 6<sup>th</sup> respectively out of 8 for floodrisk from rivers and surface water flooding. When combined together, the site is ranked 8<sup>th</sup> (last place) overall. Therefore, there appear to be 7 other 'reasonably available' sites at a lower risk of flooding than the proposed site. Consequently, this site does not pass the flood risk sequential test and should be refused planning permission in accordance with paragraph 101 of the NPPF.

If the alternative 7 sites are not reasonably available then it is for the applicant to explain why these are not available.

We do acknowledge that only 19.2% of the site area is located outside of flood zone 1 and that the entire site area is 44.24 hectares (ha). The next largest site assessed is ID number 688, Land at Bowles Farm, Horsham Road, Cranleigh which is entirely within flood zone 1 and has a site area of 29.44 ha.

#### **Objection Reason 2**

The flood risk assessment (FRA) submitted with this application does not comply with the requirements set out in paragraph 103 the National Planning Policy Framework (NPPF) and the associated National Planning Policy Guidance (NPPG). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

#### **Further Comments – Objection Reason 2**

We acknowledge that this is an outline planning application seeking full planning permission for the access road and the principle of residential development at this site. However, providing the flood risk sequential test can be passed, the submitted details must still provide sufficient evidence to ensure that the proposed development would be deliverable without increasing the number of people or properties impacted by flooding.

Currently, the submitted FRA does not provide sufficient details with regards to the potential management of surface water drainage within the site. The following paragraphs summarise our concerns regarding the surface water drainage strategy and the points of clarification that are sought.

The existing site is primarily greenfield land with approximately 6.48 hectares of impermeable area. This is mainly associated with the glasshouses on the garden nursery section of the site. From the indicative site layouts we believe that 'Area A (open space)' is proposed on existing greenfield land so will have a limited impact on surface water runoff.

'Area C' is located on the nursery site and it is expected there will be a reduction of impermeable area in this location. However, the amount of reduction has not been stated.

The proposed built development in 'Area B' is located on Greenfield land. Therefore this will increase the impermeable area however, the change in impermeable area has not been stated within the document.

We acknowledge that most of the existing site is not formally drained with the exception of the West Cranleigh Nursery which drains into 3 attenuations pond (used for irrigation) before out falling into the Littlemead Brook.

**Please clarify if it is expected that the overall impermeable area of the site will be increasing.** If impermeable area is increasing then mitigation must be provided to ensure that surface water runoff volumes will not be increasing. Without appropriate mitigation the development will be increasing flood risk and this would be contrary to paragraph 103 of the NPPF. Therefore, as much as is possible in an outline planning application please state the existing and proposed impermeable area for each part of the site (A, B and C).

If the impermeable area is expected to be increasing please **demonstrate that there will be no increase in surface water runoff volumes discharged from the site.** The current proposal has only restricted runoff rates to the existing 1 in 100 storm event rate. Since infiltration is not viable due to shallow groundwater, mitigation for any increase in impermeable area and hence runoff volumes must be provided by either:

- discharging existing volumes at existing rates for the 1 in 1 , 1 in 30 and 1 in 100 storm events and trickling off the extra volume off separately at 2 l/s/ha.
- or
- discharging all runoff from the site up to and including the 1 in 100 plus climate change storm event at the Greenfield QBAR rate. Please see the Preliminary Rainfall Runoff Management revision E guidance document for further details.

**From the information submitted we believe the current proposals are increasing runoff rates for the lower order storm events and therefore increasing flood risk elsewhere during these smaller storm events.** The proposal restricts the runoff rates to the existing 1 in 100 storm event rate of 250 l/s. This means that during small, frequent storm events, surface water runoff rates will be much higher than they are under the existing scenario. i.e. during a 1 in 1 storm events, runoff rates will increase from 67 l/s to 250 l/s (an increase of 183 l/s) and during a 1 in 30 years storm event runoff rates will increase from 180 l/s to 250 l/s (an increase of 70 l/s). This will increase off site flood risk during low order storm events.

For this reason please revise the proposals such that runoff rates for the proposed scheme for the 1 in 1, 1 in 30 and 1 in 100 plus climate change storm events will be no greater than the existing 1 in 1, 1 in 30 and 1 in 100 storm event.

Furthermore, the calculations provided have assumed that the existing nursery site drains at approximately the Greenfield rates. This may not actually be the case depending on the sizing of the existing outfalls. It may be that the existing outfalls discharge into the Littlemead Brook at rates significantly higher than the assumed Greenfield rates. If this is the case, it may not be necessary to restrict runoff rates by so much and therefore, it may be possible to discharge at a higher rate than the Greenfield 1 in 1 and 1 in 30 storm. **However, to take this approach clear evidence must be provided** as to what the existing outfall are likely to be discharging at for the 1 in 1, 1 in 30 and 1 in 100 storm events.

**Additionally please state what value has been used to calculate the climate change allowance.** This was not clear from the information provided.

As stated previously we acknowledge that this is an outline planning application. However, further details are required to ensure that any future development will not increase flood risk either on site or elsewhere. Therefore, although we seek as much information as possible, presently we require enough evidence to demonstrate that there will be sufficient space on site for some form of appropriate attenuation scheme to work.

The simplest way to demonstrate this **may be to show that there is sufficient space on site**, for example by a storage estimate calculations, etc... to contain the 1 in 100 plus climate change storm event on site when discharging at the Greenfield QBAR rate. Since this option requires the most storage space, we know that there will definitely be space for alternative drainage options if altered at detailed design stage.

We are pleased to see that the applicant intends to incorporate permeable paving with a granular sub-base as well as retaining and reusing two of the three existing attenuation ponds. As there is shallow groundwater on site, we would recommend that the permeable paving gravel sub-base is lined to prevent groundwater ingress during wet winters. This is especially important as the borehole surveys were undertaken in August when groundwater levels tend to be lower.

#### **Advice to Local Council and Applicant**

Providing the flood risk sequential test can be successfully passed we are pleased to see that a sequential approach will potentially be taken within the site layout by allocating all more vulnerable development in flood zone 1.

Furthermore, we acknowledge that a safe access and egress route has been indicated for the development onto Alford Road and travelling north.

The route to the South along Alford route is impassable due to flooding from the ordinary watercourse.

The access and egress route to the north crosses Littlemead Brook via the watercourse crossing on Alford Road. The crossing consists of a large box culvert 1.8m high with brick wall parapets (bridge railings). The modelling for the Littlemead Brook shows that the crossing design is sufficient to prevent flooding from rivers at this point of Alford Road up to the 1 in 100 plus climate change flood event.

However, the area does flood in events greater than this putting this section of Alford Road in Flood Zone 2 but outside of the 1 in 100 plus climate change flood extent.

Furthermore, our data indicates that this route is may not have a low hazard rating with regards to flooding from surface water. An assessment as to whether the access route would still be safe if flooded by surface water has not been undertaken. Therefore, we would advise the applicant to consider and assess this assess route with regards to surface water flooding.

#### **Final Comments**

Once again, thank you for consulting us. Our comments are based on our available records and the information as submitted to us. Please quote our reference number in any future correspondence.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

**If you are minded to grant planning permission contrary to our recommendation and advice please contact us prior to doing so.**

If you have any queries please feel free to contact me.

Yours sincerely

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