

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

Our ref: WA/2016/123204/01-L01
Your ref: WA/2016/2207

Date: 29 December 2016

Dear Sir/Madam,

Outline Application With All Matters Reserved Except Access; For The Erection Of Up To 265 Residential Dwellings (Class C3), Formation Of Public Open Parkland, Together With Associated Works Including Vehicular, Cycle And Pedestrian Access Routes With The Demolition Of Existing Buildings And Structures, Including 2 Existing Dwellings

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

Thank you for consulting us on the proposed development noted above. We have reviewed the information submitted with regards to our remit and wish to provide the following comments on flood risk, biodiversity and water quality.

We understand that this planning application is an outline application seeking permission for the principle of a 265 dwelling development and associated works, with all matters reserved except access.

Environment Agency Position

The submitted documents do not clearly demonstrate that the proposed development would not be placed at flood risk nor that the proposed development will not increase flood risk elsewhere. Therefore, in the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the reasons noted below.

Reasons

The FRA submitted with this application (project number 16057, Rev A, dated October 2016 and prepared by Water Environment Limited) does not comply with the requirements set out in paragraph 103 of the National Planning Policy Framework which states that for areas at risk of flooding a site-specific flood risk assessment must be undertaken which demonstrates that the development will be safe for its lifetime.

Furthermore, it does not satisfactorily take into consideration the potential impacts of climate change. In particular, the submitted FRA fails to consider the effect of a range of flooding events including extreme events on people and property. Our position is supported by paragraph 94 of the National Planning Policy Framework which requires local planning authorities to adopt proactive strategies to adapt to climate change, taking full account of flood risk. The submitted FRA does not therefore, provide a



suitable basis for assessment to be made of the flood risks arising from the proposed development and may potential place people and/or property at risk of flooding.

Although the submitted application is seeking planning approval for the principle of the development, based on the evidence at this time we are uncertain if a scheme for 256 dwellings and associated works would be deliverable and viable without placing elements of that scheme at risk of flooding or increasing flood risk elsewhere.

Further Explanation – flood risk

The proposed scheme includes residential development, and this is classified in the NPPF and the associated National Planning Practice Guidance (NPPG) as ‘more vulnerable’ development in terms of flood risk.

The indicated site lies within flood zone 1, 2 and 3. The site is adjacent to the Littlemead Brook. Cranleigh Waters is to the west of the site. We have two detailed flood models showing the site to be at risk from flooding, the Lower Wey (2009) model and the Wey (Lower) Cranleigh 2009 model.

The submitted FRA states *‘For the purposes of this study these (EA flood models) are assumed to be correct. Detailed modelling outlines for the watercourses for a range of return periods are provided in Appendix B. A detailed hydrological study to the Cranleigh Waters and Littlemead Brook catchments and bespoke hydraulic analysis of the watercourses through the site has therefore not been carried out as part of this investigation.’* However, the data supplied by us does not include a 35% or 70% allowance for climate change which must be assessed (in this instance by the applicant) in accordance with the government’s latest climate change guidance. More information on this can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Furthermore, the FRA states *‘in order to make an assessment of flood water levels for other climate change allowances it is necessary to consider flow and level data for modelled events and estimate the corresponding water levels’.* However, no detail or further explanation is provided within the FRA clarifying how the data has been calculated. We assume climate change allowances have been calculated by interpolating the data from the modelling. Additionally flow data from the Wey (Lower) Cranleigh 2009 model has not been considered as this is not available.

Further justification is required to explain why detailed hydraulic modelling has not been undertaken to estimate the climate change allowances, either through re-running the existing model with higher inflows or by constructing of a new model. **For a development of this scale and nature, we would expect a robust review of climate change allowances to establish a climate change level.** Whilst this planning application is an outline application, the final site layout will be considered based upon the climate change level assessed within the FRA. It is therefore important that the assessment of climate change is robust to ensure properties will not be located in an area that is at risk of flooding in future. We recommend the applicant refers to our Thames Area Climate Change guidance which accompanies this letter.

Overcoming Our Objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Where a re-run or new flood model is created we would recommend that this also is submitted for review either through the

formal planning application process, through our cost recovery service or if appropriate, through the flood map challenge procedures.

Biodiversity

We have reviewed the following plans and documents in relation to biodiversity issues within our remit:

- Existing Plans
- Parameter Plans
- Access Plans
- Illustrative Plans
- Design and Access Statement
- Ecology report (May 2014)
- Ecology report (July 2015)
- Chapters 8 and 9 of the Environmental Statement
- SuDS Proforma

Providing any subsequent amendments do not change/impact the details noted in these documents, and our flood risk concerns noted above can be satisfactorily addressed we are minded to request planning conditions with regards to biodiversity issues within our remit.

Water Quality

The applicant is proposing to connect to the 'mains' foul sewerage network. Therefore, as set out in the Development Management Procedure Order (DMPO) we are not a statutory consultee with regards to water quality for this proposed scheme. However, from similar proposed developments in the area we are aware that there are sewerage infrastructure issues in this locality. As the decision maker, the National Planning Policy Framework (NPPF) notes that you must also consider the cumulative impact from existing and proposed developments. We strongly recommend that you liaise with the relevant sewerage undertaker **to ensure that there is satisfactory volumetric and environmental capacity** to accommodate this scheme.

Advice To Applicant

This development may require an Environmental Permit from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated 'main rivers'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. **An environmental permit is in addition to and a separate process from obtaining planning permission.** Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Final Comments

Once again, thank you for contacting 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.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material

considerations outweigh our objection, and to give us the opportunity to make further representations. We should be re-consulted to give us the opportunity to make further representations.

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 have any queries please feel free to contact me.

Yours faithfully

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Sustainable Places | Planning Specialist

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