Policy IE1

The factual update for Policy IE1 published on the 12 November 2019 stated:

‘Planning application submitted for redevelopment of the site to provide Class B1c/B2 and B8 floorspace at the end of February 2019 (RU.19/0378). Application withdrawn on the 18 April 2019 to give consideration to concerns raised by the Environment Agency. RBC undertook a Level 2 SFRA ‘Further Analysis of Flood Risk’ in April 2019 specifically for the Byfleet Road site. The EA were consulted and responded to the further SFRA analysis on the 30 May 2019. A copy of the Level 2 SFRA Further Analysis of Flood Risk and the EAs response was sent to the applicant’s agent (Savills) on the 31 May 2019. Savills have confirmed that after liaising with the EA, flood compensation has been agreed and RBC are now awaiting a revised planning application which Savills have advised will be forthcoming by the end of 2019.’

Since the publication of the 12 November update RBC can advise that:

The EAs response to Savills noted in the 12 November update and dated 28 August 2019 is attached for information and confirms no objection to the principle of development. Since the last update the EA has issued pre-application advice to Savills in December 2019.

RBC is awaiting a revised planning application for the site which deals with the detailed design including flood mitigation/compensation measures.

Flood Maps

Since the publication of the last update on 12 November 2019, the EA has issued revised flood risk mapping. The changes to flood extents and risk levels do not materially affect any of the emerging Local Plan’s allocation sites above and beyond previous flood risk extents shown in the Level 2 SFRA (SD_03F to SD_03K) and in some instances risk has reduced (Egham Gateway West). Allocation sites not considered in the Level 2 SFRA remain in Flood Zone 1.
creating a better place

T. R. Collier & Associates
Rochester House (275) Baddow Road
Chelmsford
Essex
CM2 7QA

Our ref: WA/2019/126916/01-L01
Your ref: RU.19/0378
Date: 26 August 2019

Dear Mr Collier

ENPVAC/1/THM/00253 - cost recovery, including review of documents and meeting

Land at Byfleet Road, Byfleet Road, New Haw, KT15 3LA

Thank you for accepting our offer to provide detailed planning advice. We reviewed the following documents, prior to our meeting on 9 August 2019:

- Drawing titled Flood Compensation to Units 1-8, ref 3329/12 dated Jan 2019.
- Runnymede Borough Council Level 2 SFRA

We are providing this advice under agreement number ENPVAC/1/THM/00253. Please note we have taken 9 hours to review and provide our advice on these documents, including our recent meeting, and you will be invoiced accordingly.

Please note that we are only providing you with our advice on the matters as outlined in our offer as requested. The following issues and/or environmental constraints are relevant to the development of this site and our response to any forthcoming planning application may make reference to these matters:

- Biodiversity – see Objection 03 and 04 as detailed in our response ref: WA/2019/126407/01-L01 dated 09 April 2019

Summary
In summary, we have no objection in principle to this proposal providing the following advice is considered and addressed within any forthcoming planning application.

However, further information is required to demonstrate if there is any loss of floodplain storage within the 1% AEP flood extent, with an appropriate allowance for climate change, caused by the proposed development and if so that it can be mitigated for
Environment Agency advice
Specifically the following needs to be address:

Model data
At the meeting on 9 August 2019 we explained that we would explore whether we could supply the flood levels from the River Ditch Model. We explained that using levels from mapping (matching the boundary of the flood extent to topographic data to establish the level) would not be the correct way to represent the flood level. The actual data from the grids within the model should be used. We will follow up with a separate response to the customer in relation to the modelling data.

Loss floodplain storage
We advised that if the proposed buildings located within the 1% annual exceedance probability (AEP), plus an appropriate allowance for climate change, flood extent were raised above this level (i.e. the 1% AEP, plus an appropriate allowance for climate change flood level), we would be satisfied that the development would not reduce floodplain storage capacity or impede flood flows.

Void design
If voids are proposed to mitigate for the loss of floodplain storage caused by the built development, the underside of the void should be set above the 1% AEP, plus an appropriate allowance for climate change, flood level. The openings to the void should extend from the existing ground level to above the 1% AEP, plus an appropriate allowance for climate change, flood level. There should be 1 metre wide openings provided in every 5 metre length of wall on all sides. Void openings should be provided on all sides of the proposed building(s). If security is a concern, security bars to the void openings can be installed, spaced at centres of at least 100mm.

Floodplain compensation
We note the proposal includes floodplain compensation to the south of the site. Any proposed compensation should be provided on a level for level, volume for volume basis. We discussed at the meeting that if the buildings are to be raised with a floodable void, that the pillars of the buildings would take up flood storage and the FRA should assess whether this can be mitigated for.

We would recommend you confirm with the Local Planning Authority that they will be satisfied with you using underfloor voids as mitigation at this site. We would also recommend that a maintenance plan is developed.

Retaining wall
We explained that we would wish to see the proposed wall along the eastern boundary be removed from the proposal as this could cause impedance of flood flows. If you wish to keep the wall as part of the proposal, we would normally expect to see a structure like this represented within a flood model to assess whether it would increase flood risk elsewhere.

The FRA should also consider flood resilience for the buildings proposed within the floodplain. Finished floor levels (FFL) of the development should be raised above the 1% AEP, plus an appropriate allowance for climate change, flood level to offer flood resilience to the buildings. If it is not possible to raise to the 1% AEP, plus an appropriate allowance for climate change, flood level, the FRA should explain how flood resilience measures could make up any shortfall. If the intention is to raise the buildings with a floodable void underneath the building, then the FFL would be raised above the 1 in 100 with an allowance for climate change flood level anyway.
Please find enclosed further guidance on floodplain compensation and a drawing showing void design.

Climate change
Guidance on climate change allowances for Flood Risk Assessments (FRA) can be found at the following link https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

Final comments
Once again, thank you for contacting us with your enquiry. Our comments are based on our available records and the information as submitted to us.

I hope the above advice is helpful. If there is any further work you anticipate needing our detailed advice on in relation to this project, please let me know so it can be incorporated into this charging agreement.

Disclaimer
Please note that the views expressed in this report by the Environment Agency, is a response to a pre-application enquiry only and does not represent our final view in relation to any future planning application made in relation to this site. We reserve the right to change our position in relation to any such application. You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.

Please quote our reference number in any future correspondence. If you have any queries please feel free to contact me.

Yours sincerely

Rachel Rae
Planning Advisor

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