

Siri Thafvelin
Borough Of Spelthorne
Development Control
Council Offices Knowle Green
Staines
Middlesex
TW18 1XB

Our ref: WA/2017/124373/01-L01
Your ref: 17/01464/FUL
Date: 27 October 2017

Dear Siri

Erection of a 4 bedroom detached dwelling following demolition of the existing building and erection of a detached garage

Riverbank The Creek, Sunbury-On-Thames, Surrey, TW16 6BY.

Thank you for contacting us regarding the proposed development noted above. We have reviewed the information submitted with regards to our remit and have the following comments to make.

Environment Agency Position

In accordance with paragraph 103 of the National Planning Policy Framework (NPPF) in the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the application and recommend refusal of planning permission on this basis for the following reason.

Reason

The FRA Reference WTFR-FRA-2017/05/Q10 26th May 2017 submitted with this application does not comply with the requirements set out in the NPPF and associated Planning Practice Guidance. The submitted FRA does not therefore provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development.

In particular, the submitted FRA fails to:

1. Take into consideration the impact of climate change as no assessment has been made
2. Demonstrate the loss of flood plain storage within the 1% AEP (1 in 100) flood extent with an appropriate allowance for climate change caused by the proposed development can be mitigated for.
3. Demonstrate the proposed development has finished floor levels 300mm above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change.

Cont/d..

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 flood risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

Specifically the FRA will need to demonstrate that:

- Climate change allowances have been assessed and the appropriate allowance has been used.
- That any increase in built footprint within the 1% AEP (1 in 100) with an appropriate allowance for climate change flood extent is adequately mitigated for
- Finished floor levels are set 300mm above the 1% AEP (1 in 100) flood level with an appropriate allowance for climate change

Level for level flood plain compensation is the preferred method of mitigation because voids, stilts or undercroft parking tend to become blocked over time by debris or domestic effects leading to a gradual loss of the proposed mitigation. If it is not possible to provide level for level flood plain compensation then other forms of mitigation may be considered if agreed with the Local Planning Authority (LPA). The FRA must demonstrate that level for level compensation has been considered, explain why it was not possible to provide it and detail how any associated risks from the chosen form of mitigation can be minimised.

If voids are proposed as an alternative form of mitigation these will need to be floodable, with the underside of the void above the 1% AEP (1 in 100) flood level with an appropriate allowance for climate change. The LPA must also be satisfied that they can enforce a condition to maintain the voids as designed and that an adequate maintenance plan is in place to ensure the voids remain open for the life time of the development.

If the LPA are not satisfied that alternative mitigation measures are appropriate then the applicant should revise their development proposals to ensure that there will be no increase in built footprint on this site.

The applicant should demonstrate that raised finished floor levels for the proposed development are set 300mm above the 1% AEP (1 in 100) flood level with an appropriate allowance for climate change. This will reduce the risk of flooding to people and property.

Informatives/Advice

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

The Environment Agency does not prepare or provide Flood Risk Assessments. However, our Customers and Engagement Team can provide any relevant flooding information that we have available. This information is provided in the form of flood map products. The product supplied depends on the type and size of the development being undertaken.

Please contact enquiries_THM@environment-agency.gov.uk or write in to Customers & Engagement Team, Red Kite House, Howberry Park, Crowmarsh Gifford, Oxon, OX10

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For climate change guidance please refer to the link:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

In addition we have attached our Thames Area guidance notes on Climate change Allowances and Replacement Dwellings in Flood Zone 3.

Final comments

Our comments are based on our available records and the information submitted to us. Please use our reference number in any future correspondence. If you have any further questions please contact me.

Yours sincerely

Oliver Rathmill
Sustainable Places | Planning Advisor

Direct dial 0208 4747 682

e-mail planning_thm@environment-agency.gov.uk