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To: All Members of the **PLANNING APPLICATIONS COMMITTEE**

The following papers have been added to the agenda for the above meeting.

These planning updates were not available when the reports in the main agenda were originally prepared and supplement the information contained in those reports.

Yours sincerely

Karen Whelan

Chief Executive

PLANNING APPLICATIONS SUPPLEMENTARY INFORMATION

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<p style="text-align: center;">20 September 2018</p> <p style="text-align: center;">Planning Applications Committee</p> <p style="text-align: center;"><u>Update</u></p>		
Item No.	App no. and site address	Report Recommendation
5 Page 23	18/0327 The Waters Edge, 220 Mytchett Road Mytchett, Camberley GU16 6AG	GRANT subject to legal agreement and conditions
<p>For information purposes the comments from the County Highways Authority and Environment Agency, already relied upon in the report, are appended to this update.</p> <p><u>UPDATE</u></p> <p><u>Representation</u> (page 28)</p> <p>Members have received information from the Mytchett, Frimley Green and Deepcut Society commenting on the officer's report.</p> <p>In addition, 5 further objection letters have been received. The concerns raised relate to traffic; GP/dentist/hospital/school places; noise from the A331; insufficient parking; contractor parking; flooding; and, numbers of police.</p> <p><i>Officer comment: It is considered that these issues have been sufficiently addressed already in the agenda report. Police numbers is not a material planning consideration.</i></p> <p><u>Highway impacts</u> (page 38)</p> <ul style="list-style-type: none"> - The applicant has provided further information in respect of road adoption, as follows: <p style="padding-left: 40px;">‘Under planning and highway rules and regulations there is no requirement for new roads to be adopted. Any adoption procedure must be voluntary (as per S.38 of the Highways Act) and a developer cannot be compelled to offer the roads to the Council. In this case, Surrey County Council has indicated it would not be interested in adopting the roads.</p> <p style="padding-left: 40px;">The developer has to accept the future maintenance liability, which is usually covered by the creation of a management company, as will be the case with this development. The proposed roads will, of course, need to be designed and constructed to full adoptable standard, so the only difference is who looks after the roads in the future, not what the roads look like or how they function. This approach to dealing with roads in larger housing developments is very much the norm these days, for example, as with Deepcut and the Wellesley Barracks site in Aldershot.</p> <p style="padding-left: 40px;">In this case, the residential estate would be managed by a residents' management</p>		

company entirely separately from the management of the SANGS area. The management of the residential estate would include the roads, communal open space/landscaped areas and play areas. Annual management costs are typically of the order of a few hundred pounds per property and are graduated based on the size of the property.'

Officer comment: The applicant is correct that future maintenance of the estate roads falls outside the Planning Acts and is controlled under the Highways Act 1980. The developer can apply to the County Council to adopt the roads and enter into a section 38 agreement. The terms of the agreement describe that if the developer builds the new road up to County standards and maintains it for a year after it is built the County will then adopt it as a public road. However, there is no obligation on the landowner/developer to seek road adoption and it is not within the remit of the Planning Authority to insist upon this or refuse the application on these grounds.

Blackwater Valley footpath (page 39, para 7.5.5)

The applicant has advised that they are willing to pay for the cost of constructing the link outside the site to join the footpath. They suggest that this could be agreed through the S106 agreement, and discussions are ongoing with the Blackwater Valley Countryside Partnership and Hampshire County Council to facilitate this.

SANG Management (page 40, para 7.6.4)

Following further discussions with Natural England, the applicant was advised that the SANG management would only be acceptable if one of the following two options be adopted:

1. The developer transfers the SANG land to the ownership of Surrey Heath. Surrey Heath will construct and manage the SANG. The developer also pays the full CIL contribution for the development (not the reduced rate) in order to allow Surrey Heath to do so.
2. The Council are listed as the authority to step-in in the legal agreement, and either the SANGS contribution (difference between full CIL and reduced CIL rate) is paid to the Council as a bond at this stage and held in perpetuity (for 80 years) or an indemnity policy for this amount is taken out at this stage.

Officer comment: The applicant has agreed to option 2 which would be secured as part of the legal agreement. In the officer's opinion this provides far greater certainty over securing SANG management in perpetuity and prevents a repeat of problems experienced elsewhere in the Borough with private SANG Management. Such an approach is also consistent with other neighbouring boroughs, including Guildford and Bracknell.

Education contribution (page 46, para 7.11.3)

A letter with supporting evidence was received from The Kite Academy Trust (responsible for Holly Lodge Primary School and Mytchett Primary School) on the 16 August 2018. This evidence seeks to justify primary school funding of £720,171, in addition to early years provision of £166,916.

Officer comment: On the basis of this evidence the applicant has agreed to pay the Trust

an additional £720, 171. This would allow the Trust to provide additional primary classroom places and associated facilities at either Holly Lodge or Mytchett primary schools, which are the closest to the development, to accommodate the projected pupil yield of 52-53 children. In the officer's opinion this new evidence is comprehensive and meets the NPPF planning obligation tests. This will be secured via the S106 legal agreement.

Corrections/amendments to text

- Paragraph 7.3.3 - states that bus stops are 400-800m from the site boundary – this is incorrect as they are immediately outside the entrance, as explained in paragraph 7.5.5.
- Paragraph 7.8.3 – last sentence should read “Instead they have asked for conditions to prevent land raising and for finished floor levels.”
- Paragraph 7.12.1 - should say 0.6m rather than 6m of clean soil across the site.
- The first conditions should be numbered 1-7 not a-g – this is a formatting error.

Recommendation (page 47 and 59)

The recommendation should read as follows:

GRANT subject to a signed legal agreement (to secure affordable housing provision, SANG management, SAMM contributions, education contribution of £887,087, open space provision, monitoring of contaminated land, and a contribution towards a footpath link to the Blackwater Valley path) and subject to the following conditions:

The applicant has agreed an extension of time until 31st October to finalise the legal agreement.

Amended conditions

- Conditions 9 and 12 shall have the following penultimate sentence added: *The details shall demonstrate how the overall biodiversity status of the site has not been reduced from its baseline value, as established by the botanical survey undertaken in respect of Condition 38.*
- Condition 10 should refer to Condition 9 in the text and not Condition 8.
- Condition 11 should read as follows:

11. Prior to commencement of development, a detailed SANG Landscape and Ecology Management Plan, based on the SANG Management Plan Revision E received 15.8.18 shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall be updated to include the elements as listed under paragraph 6.117 of the Amended Ecological Assessment NKH21037 Rev C received 15.8.18 and shall include the details of the occupational phase mitigation for protected species. The SANG area as set out on Location Plan SPA001 received 18.4.18 shall be managed in accordance with the details and timescales as set out in the approved Plan.

- Condition 13 should read as follows:

13. No dwellings hereby approved shall be occupied unless and until a Residential Landscaping and Ecology Management and Maintenance Plan for the residential part of the site has been submitted to and approved in writing by the Local Planning Authority. This shall set out the long term management and maintenance details for the landscaping approved under Condition 12, biodiversity enhancements under Condition 14, the LEAP and LAP areas, and shall include the occupational phase mitigation for protected species, a map indicating the extent of public green spaces and private gardens, a species list and planting/seeding plan, and conservation management of hedges and grassland.

Additional conditions

Following further advice from Surrey Wildlife Trust and the West Surrey Badger Group, the following additional conditions are recommended:

36. Development shall not commence until a Method Statement for the protection of badgers on site, during and post-construction, has been submitted to and agreed in writing by the Local Planning Authority. The Method Statement shall include the measures proposed in paragraphs 6.58-6.70 of the Amended Ecological Assessment NKH21037 Rev C received 15th August 2018 and shall include proposals for closing of the main sett only once there is evidence that the badgers have found the artificial sett, and for post-development artificial sett monitoring for a minimum period of two years.

Reason: In order to ensure that badgers are protected during the course of the development and post-construction, in accordance with Policy CP14A of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework.

37. Development shall not commence until a Reptile Mitigation Strategy has been submitted to and approved in writing by the Local Planning Authority. The Strategy shall include a designated reptile receptor area, reptile fencing, and a reptile trapping and translocation programme, and shall have regard to the measures set out in paragraphs 6.110 – 6.115 of the Amended Ecological Assessment NKH21037 Rev C received 15th August 2018.

Reason: In order to ensure that reptiles are protected during the course of the development and post-construction, in accordance with Policy CP14A of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework.

38. Prior to commencement of development, a botanical survey (National Vegetation Classification) shall be undertaken and submitted to and approved in writing by the Local Planning Authority. The survey shall establish the current biodiversity value of the site and the status of the species and habitats for which the SNCI was selected.

Reason: In order to establish the existing biodiversity value of the site in order to sufficiently compensate for biodiversity loss, in accordance with Policy CP14A of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework.

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UPDATE

A further response has been received from the same neighbour who wrote the objection letter, following the officer explaining to them about the railings preventing access onto the flat roof. They have confirmed that they still object to the proposal as they consider it is possible for the applicant to use the roof as an “entertainment area” and install railings around it, and that the enforcement notice should stand for the unapproved part of the development to be demolished.

7 Page 93	18/0579 22 Wharfenden Way, Frimley Green , Camberley GU16 6PJ
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UPDATE

Members’ site visit was undertaken on 18th September. Cllrs Hawkins, Sams, Perry, Lytle and Gandhum visited the site.

A minor amendment has been made to the first floor floorplans, as there are only three bedrooms and a bathroom, and not four bedrooms. This does not affect the development applied for. However the proposed Condition 3 should be updated as follows:

3. The proposed development shall be built in accordance with the following plans:

- *Amended Site and Location Plan 001 Rev A received 20.8.18*
- *Amended Proposed Floorplans 004 Rev A received 12.9.18*
- *Proposed Elevations 1811-005 Rev A received 27.6.18*

There is also an error in the agenda report where the case officer has referred to Windlesham Parish Council having been consulted in paragraph 5.1. They were not consulted given the location of the site.

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APPLICATION NUMBER	SU/18/0327
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DEVELOPMENT AFFECTING ROADS

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Nicholas King Homes PLC

Location: The Waters Edge, 220 Mytchett Road, Mytchett, Camberley, GU16 6AG

Development: Outline application for the erection of 248 dwellings with associated access roads, footpaths, play areas, parking, open space and landscaping to be determined full planning permission for the use of land and associated works to provide suitable alternative natural green space (SANG) and associated parking.

Contact Officer	Angela Goddard	Consultation Date	8 May 2018	Response Date	02 July 2018
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Additional information received on 27 June 2018

The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who having assessed the application on safety, capacity and policy grounds, recommends the following conditions be imposed in any permission granted:

1. The development hereby approved shall not be first occupied unless and until the existing vehicular access to Mytchett Road has been modified to include a 3m wide section of footway on the southern side of the access extending into the site has been constructed in accordance with drawing no. 17.09-001 Rev A.
2. The development hereby approved shall not be first occupied unless and until an informal crossing with pram crossing points and tactile paving on both sides of Mytchett Road is constructed to the south side of the development access, in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority.
3. The development hereby approved shall not be first occupied unless and until a raised access platform has been constructed and a replacement bus shelter provided at the existing bus stop between the development access and no. 218 Mytchett Road in accordance with details to be submitted to and approved in writing by the Local Planning Authority.
4. The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for a minimum of 370 vehicles to be parked and for vehicles to turn so they may enter and leave the site in forward gear. Thereafter the parking/turning areas shall be retained and maintained for their designated purposes.

5. The development hereby approved shall not be first occupied unless and until a minimum of 1 secure cycle space per each 1 and 2 bedroom unit and 2 secure cycle spaces per each unit with 3 or more bedrooms has been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

6. The development hereby approved shall not be occupied unless and until at least 26 of the available parking spaces for the flats and each individual dwelling are provided with a fast charge socket (current minimum requirement: 7 kw Mode 3 with Type 2 Connector - 230v AC32 amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

7. No development shall be commenced until a Construction Transport Management Plan, to include details of:

- a). parking for vehicles of site personnel, operatives and visitors
- b). loading and unloading of plant and materials
- c). storage of plant and materials
- d). programme of works (including measures for traffic management)
- e). measures to prevent the deposit of materials on the highway
- f). on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development

8. Prior to the commencement of the development a residential Travel Plan shall be submitted for the written approval of the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy Framework, Surrey County Council's 'Travel Plan Good Practice Guide' and in general accordance with the 'Heads of Travel Plan' document. And then the approved Travel Plan shall be implemented prior to first occupation and for each and every subsequent occupation of that development, thereafter maintain and develop the Travel Plan to the satisfaction of the Local Planning Authority.

Reason

The above conditions are required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

Policy

Policies CP11 and DM11 of the Surrey Heath Core Strategy 2012 and the National Planning Policy Framework. Condition 4 above is required in recognition of Section 4 'Promoting Sustainable Transport' in the National Planning Policy Framework 2012 and to meet the requirements of the Surrey Heath Core Strategy and Development Management Policies.

Informatives

1. **Condition 6** - It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to <http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.

2. The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage

Act 1991. Please see
www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.

3. The developer is advised that as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
4. The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the Highway Authority Local Highways Service.
5. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).

Note to Case Officer

The site currently comprises a 17 bay golf driving range and restaurant/cafe which is no longer trading. The proposed residential development is for 248 dwellings utilising the existing vehicular access onto Mytchett Road.

Accessibility

The nearest bus stops to the site are located immediately to the south and north of the development access with Route 3 (Yateley - Aldershot) providing a 30 min frequency.

The bus stop to the north of the development access will be upgraded to provide a raised access platform to improve accessibility and a replacement bus shelter.

The nearest train stations are North Camp (Reading-Gatwick) which is approximately 1 km from the site (12.5 minute walk) and Ash Vale (London Waterloo -Alton line) is 1.2 km from the site (15 minute walk). Local shops are located on the northern section of Mytchett Road and approximately 1 km from the site (12.5 minute walk).

Access

The proposed development will utilise the existing vehicular access onto Mytchett Road but will be modified to include a 3m wide footway/cycleway extending into the site. It has been agreed with the Highway Authority that this will be the single point of access for the development.

The access has adequate visibility, with a minimum provision of 43 metres in both directions from 2.4 metres back along the centre of the access. It also has sufficient width to allow simultaneous entry and exit of two vehicles. It is considered that the access is suitable to serve the proposed level of development.

Vehicle Movements

The traffic generation data included in the Transport Assessment shows that the development is likely to generate 94 two-way vehicle trips in the am peak (08.00 am - 09.00 am) and 94 two-way trips in the pm peak (17.00 to 18.00). The Highway Authority requested that the developer carry out sensitivity testing by only using trip rates per dwelling from surveys of sites in the South/South East to better reflect the location of the site.

Comparing the trip generation from the different survey samples shows a negligible difference in the predicted weekday am peak hour (93 two-way trips) and a small increase in the weekday pm peak hour (104 two-way trips).

Junction Assessment

In order to assess the existing peak hour conditions on the local highway network and to establish a baseline for traffic modelling, manual surveys were conducted at 3 key junctions along Mytchett Road:

- Hamesmoor Road/Mytchett Road/Sturt Road
- Coleford Bridge Road/Mytchett Road/Mytchett Place Road
- Mytchett Road/Stratford Road/Frimley Road

The observed traffic surveys included an assessment of the level of queuing at each of the junctions and modelling using the Junction 8 modelling software. The junction assessments show that only the Mytchett Road/Mytchett Place Road/Coleford Bridge Road junction will experience a material impact as a result of development traffic.

The site access junction onto Mytchett Road was modelled to include the 2023 plus development scenario. The results show that the site access plus development traffic will operate within its theoretical capacity with minimal queuing.

The Mytchett Road/Mytchett Place Road/Coleford Bridge Road junction is a double mini roundabout junction at which traffic surveys recorded a degree of queuing and is operating beyond its theoretical capacity on the Mytchett Place Road arm and close to capacity on the Mytchett Road (south) arm, and junction modelling showed this would be exacerbated by development traffic.

The initial approach to mitigating the impact of the additional traffic generated by the development was to consider replacing the double mini roundabouts with traffic signals and this option was explored with the Highway Authority. However comments received from local residents at a public exhibition suggested the scheme would raise local concerns and appeared to be an excessive solution to a traffic impact that would only be experienced during the peak periods and not during the rest of the day.

Additional traffic surveys of the roundabouts were conducted in March 2018 which helped to establish the pattern of queuing at the junction. The results showed that any queues that build up do so quickly and then disperse quickly. The observed queuing on the Mytchett Place Road and Mytchett Road (south) in the pm peak is significantly less than the computer generated junction modelling suggests.

It was agreed with the Highway Authority that no changes are required at the double mini roundabout in order to mitigate the impact of the development.

Parking

The proposed level of parking for the development will be 370 spaces, with 1 space for 1 and 2 bedroom units and 2 spaces for units with more than 3 bedrooms, however additional parking for visitors may also be included. This level of parking meets the minimum parking guidance for residential development set out in Surrey County Council's 'Vehicular and Cycle Parking Guidance January 2018'.

Cycle Parking

The level of cycle parking proposed for development has not been included in the application. However the minimum required levels are 1 cycle space for 1 and 2 bedroom units and 2 cycle spaces for units with 3 or more bedrooms. A condition has been recommended for the developer to provide details of cycle parking.

Cycle parking should be designed and provided in accordance with the appropriate government guidance. Current guidance suggests that such parking should be undercover, lit secure, adequately signed and as close to the destination as possible (within 20 m).

Layout

The developer has confirmed that they do not intend to offer the roads within the development for adoption.

A single point of access for emergency vehicles was considered acceptable subject to the provision of looped access roads within the development.

Additional information was requested from the developer to demonstrate that a fire appliance was able to negotiate the roads, particularly at junctions within the site. The submitted swept path plots show that a fire appliance is able to access all areas of the proposed development and that the proposed turning areas are adequate to accommodate this vehicle.

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creating a better place



Mrs Emma Pearman
Surrey Heath Borough Council
Planning Department
Surrey Heath House Knoll Road
Camberley
Surrey
GU15 3HD

Our ref: WA/2018/125186/02-L01
Your ref: 18/0327
Date: 16 August 2018

Dear Mrs Pearman

Outline application for the erection of 248 dwellings with associated access roads, footpaths, play areas, parking, open space and landscaping, with matters of access, scale, layout and landscaping to be determined full planning permission for the use of land and associated works to provide suitable alternative natural green space (SANG) and associated parking

The Waters Edge, 220 Mytchett Road, Mytchett, Camberley, GU16 6AG

Thank you for consulting us on the additional information submitted in support of this planning application.

We have reviewed the following additional details :

- Flood Risk Assessment (FRA) addendum reference: 132983-R1(5)-FRA-Addendum dated 18 July 2018 undertaken by RSK
- Letter reference NKH21037 dated 16 July 2018 from ACD Environmental

Our previous response to this development raised two concerns around the potential increase in flood risk as a result of the SANG, the impact of development on the important species and habitat and the impact of the development adjacent to watercourses.

We can now advise that the applicant has submitted information which sufficiently addresses our concerns and we are able to remove our objections to the development.

Environment Agency position

We consider that planning permission could be granted to the proposed development as submitted if the following **planning conditions** are included on any planning permission. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Condition 1

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) 132983/R1 (5)-FRA dated 17 April 2018 and the FRA Addendum dated 18 July 2018 undertaken by RSK and the following mitigation measures detailed within the FRA:

1. There shall be no land raising within the 1 in 100 year climate change flood extent as shown in Appendix J.
2. Finished flood levels are set no lower than 66.33 metres above Ordnance Datum

Reason

To prevent flooding elsewhere by ensuring flood storage is retained and protected and to reduce the risk of flooding to the proposed development and future occupants in accordance with paragraph 163 of the National Planning Policy Framework (NPPF).

Condition 2

The development permitted by this planning permission shall not commence until a scheme for the provision and management of a 10 metre ecological buffer to the River Blackwater main river shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting and formal landscaping. The schemes shall include:

- plans showing the extent and layout of the buffer zone including hard landscaping.
- details of any proposed planting scheme using locally native species of UK genetic provenance.
- details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- a working methods statement detailing how the buffer zone will be protected during construction.

Reason

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site in line with national planning policy.

This condition is supported by the National Planning Policy Framework (NPPF), paragraph 170 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Advice to Planning Authority

We would also advise that you consider whether management of the lakes and the existing sluice gate is included to ensure lake levels are managed to prevent overtopping causing flooding. Please also note that if lakes are groundwater fed levels will go up and down so this would need to be appropriately managed. This is not within our remit to comment on.

Sequential Test

In accordance with the National Planning Policy Framework paragraph 158, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework. Our flood risk standing advice reminds you of this and provides advice on how to do this.

Flood Risk - Safe Access and Egress

In accordance with paragraph 163 of the National Planning Policy Framework (NPPF), you must ensure that the development is appropriately flood resilient and resistant, including safe access and escape routes where required. This is on the understanding that you have concluded that the proposed development has passed the flood risk sequential test.

Within the application documents the applicant should clearly demonstrate to you that a satisfactory route of safe access and egress is achievable. It is for you to assess and determine if this is acceptable.

We enclose a copy of our safe access and egress guidance statement to assist you with your assessment. Please note we have not assessed the proposed access and egress route.

Informative

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>.

Advice to Applicant

The river Blackwater in this location is quite unique in the valley as there is no development on either side of the watercourse, and no formal paths. We encourage the applicant to work with partners such as the Blackwater Valley Countryside Partnership to identify opportunities to protect and enhance the bank-side wildlife community.

Final comments

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

If I can be of any further assistance, please contact me directly.

Yours sincerely

Miss Sarah Green
Sustainable Places - Planning Advisor

Direct dial 0208 474 9253

Direct e-mail planning_THM@environment-agency.gov.uk