

creating a better place



Ms Sarita Bishop
Surrey Heath Borough Council
Planning Department
Surrey Heath House
Knoll Road
Camberley
Surrey
GU15 3HD

Our ref: WA/2019/126940/03-L01
Your ref: 19/0420
Date: 13 February 2020

Dear Ms Bishop

**Erection of a headquarters and distribution facility totalling 15,985sqm consisting of warehouse (b8), office (b1a) (including product display area and canteen), training and workshop facilities (b1c), car parking and service yard, ground remodelling and landscaping (including flood attenuation areas), and the construction of a new left in left out access from the A331.
Sewage Disposal Works, 30 Doman Road, Camberley, GU15 3DF.**

Thank you for your emails dated 3 and 16 January 2020 regarding the above planning application. I also refer to our response dated 26 November 2019 to the above planning application.

Site summary

The site lies with Flood Zones 3b, 2 and 1 in accordance with our flood map for planning. Flood Zone 3b (functional floodplain) is defined as land where water has to flow or be stored in times of flood in accordance with Table 1 'Flood risk' of the Planning Practice Guidance.

Environment Agency Response

1) Proposed development incompatible with Flood Zone and flood risk modelling

We are **maintaining our objection** to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. This objection is set out in more detail in our response letter dated 26 November 2019.

Regarding the flood risk modelling submitted with this planning application the applicant has completed a site specific review of the flood levels to consider the impact of climate change only. The applicant has not submitted any information regarding other flood levels and, through their technical note, have confirmed the Environment Agency flood maps are appropriate.

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Site specific FRA and flood map challenge

The flood zones are identified on the Environment Agency Flood map for planning. In some cases, the calculations (models) for flooding may use basic data and simplified assumptions leading to the level of flood risk being over estimated. If the applicant believes the flood risk is not as great as the flood map, a review of the model can be completed.

The developer can use surveyed ground levels and improved data to determine more accurate level of flooding and the likely probability of a range of flood events occurring. This assessment can be for a specific site or for a reach of the adjacent watercourse affecting the site.

If the developer assesses the impact of flood at a particular location, this is a site specific flood risk assessment including modelling. We assess how this review was completed to ensure the data and methodology were appropriate. This would not be used to amend the flood outline of the flood map.

The applicant may review the flood model for a significant length of the watercourse to establish the impact on the development. This information needs to be submitted to the Environment Agency with the FRA and be submitted as a "Flood map challenge" to have the flood map modified. We would assess the revised information to ensure the data and methodology were appropriate for the planning application as well as revising the flood map. We have received no data or request to challenge the Environment Agency flood map.

2) Flood Risk Assessment

From the information we have reviewed, the scheme will offer compensation for the risk of flooding and satisfies the requirements to remove our objection on fluvial flood risk technical grounds.

The applicant has confirmed that functionality of the compensation scheme for flood risk by modifying the existing drainage channel.

The applicant has confirmed flows across site will be maintained via a channel along southern edge of the site. The existing drainage channel will be modified by cutting away the side wall on the north side, to allow flood water to rise from the Blackwater along the channel and flood into the compensation area and drain away when flood waters recede. The applicant has confirmed the compensation area will be landscaped to suit and will ensure the compensation area freely drains.

We recommended the channel wall should be opened up for the maximum length that is reasonably practicable, between the out let of the covered section of the channel to the storm drain outfall. Through a drawing provided and subsequent correspondence, the applicant confirmed the length of this modified channel would be 20 metres. We are satisfied with that explanation.

The applicant has identified, through the drawings 007 through to 011, the different flood levels for various flood events.

We are also satisfied that the PBA submission shows the reduced level of flood risk for this site specific flood risk assessment.

Surrey Heath Borough Council drainage engineer comments

From the information in the FRA, we understand the applicant has considered the volume of displaced flood water from the proposed development and accounted for this in the mitigation measures. In addition to this, we believe the two areas highlighted by yourselves are relatively small in relation to the overall displaced volume and mitigation, so would have a minimal impact on the level of flooding.

In conclusion we are satisfied with the flood risk compensation for fluvial flood risk for this planning application.

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 have any queries please contact me.

Yours sincerely

Miss Michelle Kidd
Planning Advisor

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E-mail planning_THM@environment-agency.gov.uk

cc Savills (UK) Ltd