Dear Sir/Madam

Surrey County Council Independent Examination of Surrey Waste Local Plan 2019-2033 - Draft Matters and Issues

Thank you for consulting us on Draft Matters and Issues, dated 7 June 2019.

Representor 102 – The Environment Agency Matter 5: Allocations and ILAS (Policies 10, 11a, 11b, 12)

Question 77
We have reviewed the Surrey Waste Local Plan (SWLP) Proposed Additional Modifications document, dated 16 July 2019.

AM2, of the proposed SWLP Part 2 – Sites, proposes to amend the key environmental sensitivities section on flood risk for site 4.15, Byfleet Road Employment Allocation, to read: “The area is subject to a combination of Zone 2 (0.1% to 1.0% AEP) and Flood Zone 3 (>1.0% AEP) fluvial flood risk”.

Whilst this better describes our current understanding of flood risk at this site, our earlier concerns about development at this site still remain. We are concerned that there is not enough space in Flood Zone 1 at this site to develop 20,000m2 of floor space referred to in Runnymede Borough Council’s emerging local plan.

This site was identified in Runnymede Borough Council’s draft local plan 2030. We opposed that site’s inclusion as an allocation because we were concerned that flood risk had not been properly acknowledged and considered at this site.

In March 2019, Runnymede Borough Council consulted us on a planning application (their ref. RU.19/0378) for the development of B1c/B2/B8 floor space at this site. We responded to Runnymede Borough Council in April 2019 objecting to the proposal on the grounds of flood risk and biodiversity.

The southern boundary of the site is adjacent to a main river, the Rive Ditch. According to our current Flood Map for Planning the site is located in Flood Zone 3, Flood Zone 2 and Flood Zone 1. Flood Zones 3 and 2 are defined by the National Planning Policy...
Framework (NPPF) and associated National Planning Policy Guidance (NPPG) as having a high and medium probability of flooding respectively.

At the time of submission, and based on the best available data and the information as presented to us, we determined part of the application site was located in Flood Zone 3b – The Functional Floodplain. This was in accordance with Runnymede Borough Council’s Strategic Flood Risk Assessment (SFRA).

The application proposed development, including a retaining wall and a flood exceedance routes ditch within the area of the site at a high risk from flooding. The submitted Flood Risk Assessment (FRA) did not adequately assess flood risk posed by the development. The FRA failed to demonstrate if there was any loss of floodplain storage within the 1% annual exceedance probability (AEP) flood extent, with an appropriate allowance for climate change, caused by the proposed development and if it could be mitigated for. The assessment of climate change was inadequate and it had not been demonstrated that finished floor levels would be set at a suitable height i.e. above the 1% AEP flood level, with an appropriate allowance for climate change.

Since our initial response, we have reviewed further work undertaken by Runnymede Borough Council. We are now content that there are no areas of Flood Zone 3b - Functional Floodplain. However, further work is still required in order to define the 1% AEP flood level, plus an appropriate allowance for climate change, flood extent at the site.

On this basis, and whilst we cannot comment definitively, it appears likely that our concerns regarding flood risk at the site are capable of being overcome. If our discussions progress, we will provide a further written update before the hearing session.

Question 81
We note the hearing timetable has listed as attendees in relation to Industrial Land Areas of Search (ILAS) site 4.1 Byfleet.

We understand site 4.1 is the Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate. We did not mention this site in our written representations. Therefore, we are not able to answer the Inspector’s questions in paragraph 81 of the draft Matters and Issues. We make no further comments in relation to site 4.1.

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

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

Yours faithfully

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