



The Red House
Station Lane
Milford
Surrey GU8 5AD

27 August 2014

Dear Sir,

Re Application Number WA/2014/0912

Land South Of High Street Between Alfold Road And Knowle Lane, Cranleigh

Guildford, Woking and Waverley Friends of the Earth wishes to lodge an objection to this outline planning application based on the inadequate flood risk assessment provided by the Applicant.

While it appears that (to date at least) the Environment Agency has not registered an objection to this site that does not mean that it is not open to Waverley Borough Councillors to refuse this application on flood risk grounds. Planning Practice Guidance published earlier this year states that ***“Ultimately the local planning authority needs to be satisfied in all cases that the proposed development would be safe and not lead to increased flood risk elsewhere.”***

As hydrology is a technical area we have obtained specialist advice from a reputable firm of consultant hydrologists. Wallingford Hydro Solutions is a leading UK hydrology consultancy which advises developers and public authorities on all aspects of hydrology relating to development (<http://www.hydrosolutions.co.uk/index.asp>). Wallingford Hydro was asked to provide an analysis of the Berkeley Strategic's Flood Risk Assessment for this site. The individual who carried out this work has previously spent a number of years working for the Flood Risk and Development Control teams in the Environment Agency and was supervised by a leading member of the practice with over 20 years experience.

We have now been advised by Wallingford Hydro that there are at least ten grounds of objection based on failures and omissions in the Applicant's Flood Risk Assessment relating to pluvial and fluvial flooding alone. A copy of the full report is attached. We think it is important to note that the instruction to Wallingford Hydro did not extend to requesting a technical review of the risk of flooding from groundwater but clearly the failures and omissions identified in relation to the Applicant's Flood Risk Assessment relating to fluvial and pluvial flooding raise serious concerns about the scope of their report in relation to potential flooding from groundwater as well.

Accordingly we object to this outline application on 10 grounds which are detailed in the attached Wallingford Hydro report and summarised below:-

Ground 1 – Failure to include relevant recent flood risk data in Applicant’s Flood Risk Assessment relating to flooding in the December 2013 to February 2014 period.

The Applicant’s Flood Risk Assessment report was written around two months after this flooding occurred so it is reasonable to expect to see it referred to and included in the Applicant’s Flood Risk Assessment but the FRA omits any reference to these events.

Without incorporating all this data Wallingford Hydro (quite understandably) does not believe an appropriate assessment of flood risk has been undertaken in the Applicant’s Flood Risk Assessment.

Ground 2 – Failure to carry out appropriate consultation with the relevant authorities to enable and an informed assessment of flood risk based on the historic flood risk data.

Section 2.9 of the Applicant’s Flood Risk Assessment details the historic flooding record used to inform the assessment. This data has been obtained via consultation with various flood risk management bodies as listed in table 2.2 of the Applicant’s Flood Risk Assessment. Wallingford Hydro’s assessment is that this consultation has not been undertaken appropriately and that the responses to the consultation indicate a lack of formally recorded data rather than a lack of flood risk at the site. Full details of this ground of objection are given in the attached report.

Ground 3 Omission of local data contrary to requirement of National Planning Policy Framework

In the view of Wallingford Hydro, the omission of local data from the Applicant’s Flood Risk Assessment does not adequately inform Waverley Borough Council or any of their consultees and enable them to give appropriate consideration to local flood risks as required by the National Planning Policy Framework.

Ground 4 – Failure to consult Lead Local Flood Authority

The historic data for this site suggests that local flood risk are likely to significantly affect the development and therefore the lead local flood authority (Surrey County Council) should be an important consultee to inform and assist the Applicant’s Flood Risk Assessment. There is no evidence on the public record of this consultation being completed by either the developer or Waverley Borough Council

Ground 5 - Measures proposed by the Flood Risk Assessment to avoid, manage and mitigate flood risk have not been appropriately assessed and secured for the lifetime of the development.

The Applicant’s Flood Risk Assessment (Paragraph 4.1.8) argues that a garden and car park walls to the rear of High Street, St James’ Place and Cranleigh Methodist Church prevent flood water from accessing the overland flow route from Cranleigh High Street to the Littlemead Brook and therefore (according to the Applicant) water does not reach the site in all flood scenarios up to and including the 1 in 1000 year (extreme) event. The Flood Risk Assessment modelling demonstrates the dependency on these wall structures to prevent water ingress on site but does not provide the

details required by Paragraph 038 of PPG relating to these structures or explain how they will be maintained and secured for the lifetime of the development.

Objections relating to access and egress from the site.

Every access route away from the development will be inaccessible by foot or car in a flood event similar to the one that occurred earlier this year (2014). Even if the properties themselves are lucky enough to escape flooding, people would be isolated for a number of hours/days whilst the surrounding flood waters recede. Furthermore the proposal is for 425 dwellings of predominately family- sized homes. This could equate to additional 1500+ people living in an area at risk of flooding, increasing the scale of any evacuation considerably.

On access and egress matters, paragraph 058 of the PPG states *“Local planning authorities are advised to consult with their emergency planning officers as early as possible during the preparation of Local Plans, and also regarding any planning applications which have implications for emergency planning.*

We therefore have a number of grounds of objections relating to access and egress problems which the Applicant’s Flood Risk Assessment fails to address.

Ground 6 – failure to demonstrate voluntary and free movement of people during a ‘design flood’.

Ground 7 – failure to demonstrate vehicular access to allow the emergency services to reach safely the development during design flood conditions.

Ground 8 – failure to demonstrate safe access routes during design flood conditions.

Ground 9 – failure to give due consideration to the additional burden on the emergency services in a flood event.

Ground 10 – lack of evidence of consultation with either the Emergency Planning departments, Emergency Services or Local Resilience Forum as recommended in NPPF.

These are clearly serious failures and omissions in respect of a site which is in an area of high flood risk and which includes areas in Flood Zones 2 and 3.

We wish to draw the attention of Councillors to Paragraph 101 of the NPPF which states that "the aim of the Sequential Test is to steer development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding".

In the final analysis, by means of this highly flawed and inadequate report, the Applicant appears to be trying to persuade the authorities that a development site in an area

- prone to flooding
- which has recently flooded
- which has been made inaccessible during that recently flooding

- on a site which contains areas classified by the Environment Agency as within Flood Risk Zones 2 and 3

is in fact at no risk from flooding.

Clearly on the basis of the 'evidence' produced by the Applicant no such conclusion can be drawn safely by Waverley Council as the local planning authority. Nor can Councillors be satisfied that the "proposed development would be safe and that it would not lead to increased flood risk elsewhere" as required by the National Planning Policy Guidance.

Accordingly this outline application should be refused.

Yours faithfully,

K E Smyth

on behalf of Guildford, Woking and Waverley Friends of the Earth