EASTERN AREA PLANNING COMMITTEE
ON 04 JULY 2018

UPDATE REPORT

Item No:	**(2)**	**Application No:**	18/00562/COMIND	**Page No.**	49-63

Site: Home Farm, Purley On Thames, Purley Village, Reading, Berkshire RG8 8AX

Planning Officer Presenting: Mr Simon Till

Member Presenting: N/A

Parish Council Representative speaking: Cllr Graham Rolfe - Purley On Thames

Objector(s) speaking: N/A

Supporter(s) speaking: N/A

Applicant/Agent speaking: Mr Timothy Metcalfe

Ward Member(s): Councillor Tim Metcalfe
Councillor Rick Jones

1. **Environment Agency & Lead Local Flood Authority objections**

   The Environment Agency and Lead Local Flood Authority have reviewed the Flood Risk Assessment submitted by the applicant, and have identified inadequacies with the level of information contained therein. A copy of both objections is included on this update sheet at points 4 and 5. The applicant has been notified on these objections, but wishes for the application to be determined in its current form.

2. **Altered recommendation**

   In light of the objections from the Environment Agency and the Lead Local Flood Authority, your officer's recommendation at part 8 of the agenda report is altered to:

   "To **DELEGATE** to the Head of Development & Planning to **REFUSE PLANNING PERMISSION** for the reason given at point 3 of the update sheet."

3. Refusal reason

The following reason for refusal is recommended:

"The application proposes a cut and fill operation to create a flat sports pitch area for use by St Johns Church of England School and a new driveway and running surface for vehicles serving Home Farm to the north of the site. The site is located entirely within Flood Zone 2 and a substantial part of the site is located within Flood Zone 3. The submitted flood risk assessment accompanying the application does not contain sufficient detail to establish that the proposed works would not result in an increase in flood risk on the site and surrounding area, or sufficient detail to confirm that an effective strategy would be employed to manage drainage on the site such as to prevent an increase in flood risk on the site and in the surrounding area. The proposed works are therefore contrary to the requirements of the National Planning Policy Framework (2012) that requires that when determining planning applications Local Planning Authorities should ensure flood risk is not increased elsewhere; Policy CS14 of the West Berkshire Local Plan Core Strategy (2006-2026) 2012 which requires development to demonstrate a high quality and sustainable design that makes a positive contribution to the quality of life in West Berkshire; and Policy CS16 of the West Berkshire Local Plan Core Strategy (2006-2026) 2012 which states that development in Flood Zones 2 and 3 will only be permitted where it can be demonstrated that it would not have an impact on the capacity of an area to store floodwater, it would not have a detrimental impact on the flow of fluvial water, surface water or obstruct the run-off of water due to high levels of groundwater, and that appropriate measures to manage flood risk can be implemented with provision made for long term maintenance and management of any flood protection and mitigation measures."

4. Environment Agency objection

Mr Simon Till
West Berkshire District Council
Development Control
Council Office Market Street
Newbury
Berkshire
RG14 5LD

Our ref: WA/2018/125057/02-L01
Your ref: 18/00562/COMIND

Date: 26 June 2018

Dear Mr Till

RE-ALIGNMENT OF THE FARM DRIVE ALONG WITH ASSOCIATED LANDSCAPING AND USE OF PART OF THE SITE FOR D2 (OUTDOOR SPORTS AND RECREATION) USE FOR UP TO 250 DAYS PER ANNUM

HOME FARM, PURLEY VILLAGE, PURLEY ON THAMES

Thank you for consulting the Environment Agency on the above planning application. Please note I am responding on behalf of our Thames Area.

We **object** to the application as submitted for flood risk reasons, which are explained below.

Flood Risk
We have reviewed the documents listed below:

- Flood Risk Assessment prepared by KRS Environmental Ltd, reference KRS.0096.003.R.001.A dated June 2018.
- Location plan drawing 5905.LP.002 dated January 2018
- Existing layout drawing 5905.005 dated January 2018
- Proposed layout drawing 5905.006 dated January 2018

The submitted FRA fails to demonstrate that:

- The raised road will not impede flood flow
- The proposed culverts will allow flood water to flow beneath the elevated road

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 majority of the site lies within Flood Zone 3, defined by the NPPF as having a high probability of flooding. The proposed development will result in a loss flood plain storage and will impede flood flow within the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change. This development will therefore increase the risk of flooding both onsite and elsewhere which is contrary to paragraph 30 part 7 of the National Planning Policy Framework.

It is proposed to raise the road by 60 cm in some places which will potentially block the flow of flood waters. It also says in section 4.4 “the new farm drive will be raised to a minimum of 39.60mAOD” indicating that it might even be raised by more than 60cm.

The FRA states that to ensure that the playing field is not cut off from the likely source of flooding a number of culvert/s will be constructed beneath the raised farm drive. However not detail is provided and this is not represented in their proposed lay out plan. To understand whether this would be effective we need to see the detail of the proposed design, understand the carrying capacity of the culverts and we would need an explanation of how it would be possible to ensure the culverts didn’t become blocked over time.

Overcoming Our Objection
The applicant can overcome our objection by submitting a revised 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

- The new access road will not impede flood flow
- The proposed culverts will allow flood water to flow beneath the elevated road. Detail is needed on their location, design, capacity and maintenance.

Please re-consult the Environment Agency on the above further information when it is submitted.

Yours sincerely

Ms Ellie Challans
Planning Advisor – Wessex Sustainable Places

Direct dial 02030 259311
E-mail planning_THM@environment-agency.gov.uk

cc Mr Andrew Metcalfe - Enplan LLp

5. Lead Local Flood Authority objection

From: Jon Bowden
Sent: 26 June 2018 17:46
To: Simon Till <Simon.Till@westberks.gov.uk>
Cc: Charlie Cooper <Charlie.Cooper@westberks.gov.uk>
Subject: <v9_SmartSaved/> FW: 18/00562/COMIND: Home Farm - Access track & D2 use
Importance: High

Hi Simon,

My initial view of the FRA was that the main proposals would be acceptable, subject to confirmation of the details. However, further discussions with Charlie have raised a couple of additional concerns.

The principle of culverting under the proposed access to allow free flow of flood water from either side is still acceptable, but this would be subject to suitable details being provided. These details should be provided now to enable us to more fully assess the proposal.

The FRA uses flood levels obtained from the EA, the most pertinent being the 1 in 100 year + climate change level; CC is 20% as per the EA Base Model. Current guidelines now call for 35% however. The FRA acknowledges this and therefore essentially accepts that the new road may be underwater at times of severe flood (ie. if the 35% CC event occurred). This seems reasonable on the basis that it is an access that is at risk, rather than dwellings, but if possible I would like a comment from the EA on this approach.

The proposals show a general decrease in ground levels to the south of the new access to facilitate the playing field but an increase in level to the north as a result of using "cut and fill" techniques. Both we and the EA were previously concerned that the proposals do not result in a reduction in the available flood storage capacity and there is no information given to show this is not the case. Full calculations showing volumes of cut and fill on a 'level for level basis' must be provided.

Due to the raised levels north of the track, any culverting under the access will need to be extended virtually to the site boundary in order to allow free movement of flood water to/from the lower area to the south. This extended length of culverting potentially creates problems for inspection and maintenance. Even if extended culverts are used, the existing ground levels outside of the site are above the lowest proposed level within the site (38.9m) which will be the determining factor for flood storage, hence not all stored flood water will be free to pass back through the culverts but will instead only drain away through soakage or evaporation. If a second flood event occurs before the storage area has fully drained away then storage capacity for the second flood will be reduced. This is not acceptable.

I note that the proposed access falls down to the existing highway meaning that there will be run-off from the track. Proposals are required to show how this will be intercepted and dealt with using suitable SuDS measures.

In view of the above, I think there is still too much outstanding information of a detailed nature required to allow approval with conditions on flood / SuDS grounds.

I have just now seen the response from the EA which you forwarded and note that they are still maintaining an objection; we would support this.

Regards

Jon Bowden
Senior Engineer (Land Drainage)
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