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11 October 2019

Consultation Response 2018/3810 Assessing The Trigger Point For Carpark Closure

I write with respect to the email reply from the applicant's agent (James Owens) dated 16 August 2019 which was in response to my email dated 27 June 2019. My email stated:

"My view is that the trigger point to close the car park should be ascertained prior to determination and not kicked into the long grass, otherwise known as a planning condition. The reason for this is that if the trigger point is at a level which means that there is a reasonable risk that the car park would be closed for lengthy periods then the Council would need to take a view as to whether the proposed parking solution is credible.

I would have thought that Alexpo's advisors could consult with the EA and answer the following questions:

- 1) At what flood level would the car park be closed?*
- 2) Based on historic flood data over the last 50 years how many days would the car park have been closed?*
- 3) Would the car park have been closed in winter 2014, if so, for how many days?"*

The reply from Mr Owens was:

"In terms of the car park needing to close, the upper level of the car park is designed to flood to a restricted depth and in the 1 in 100 year event plus 35% for climate change, much of the surrounding road network and East Molesey will already be experiencing significant flooding regardless of whether the proposed scheme is built or not. The station would be closed if such an event happened and therefore there would be no need for station car parking".

Mr Owens will be aware from the application topographical drawings that the existing station and platforms sit at an average of 9.2m AOD and the railway tracks at an average of 8.4m AOD and from the FRA (paragraph 3.19):

"In order to accommodate any losses in floodplain storage, it is proposed that the lower ground floor (undercroft parking area) is set at 7.25m AOD to allow flood water to flow in naturally from Cigarette Island Park, with the aim of balancing the loss of storage resulting from localised land raising and the additional development footprint".

It is therefore entirely plausible that the undercroft carpark could be flooded, or on the verge of flooding, while simultaneously the station and surrounding roads, which are more than 1m higher, are fully operational. We are also aware that the undercroft carpark will sit at a level below the current carpark and that 2014 flood levels reached 6.7m AOD, so only 50cm below the point the undercroft would have flooded. We also note that Mr Owens states that if the car park flooded there would be no need for station parking because the station would also be closed but would the new apartment blocks and the new hotel also be closed? If not, where will their vehicles park?

The potential for the undercroft carpark to flood is therefore very real and it has been designed accordingly. It is therefore perfectly reasonable that the trigger point to close the carpark is agreed prior to determination of this application.

The FRA points to advance warning of flooding (para 3.33):

“...advance warning would be provided 4 to 5 days prior to flooding occurring at the Site”.

We also note that the FRA wrongly suggests (para 3.60) that there is a low risk of tidal flooding:

“The Site is considered to be at a low risk of flooding from tidal, pluvial, groundwater and artificial sources”.

Local residents and the Environment Agency will be well aware that the site is at risk from tidal flooding on a periodic basis due to spring tides which rise over Teddington lock and increase river levels by some 60cm in the space of thirty minutes, so not the 4 to 5 days warning that the applicant assumes. The applicant will likely suggest that a future site manager will monitor spring tides, however we suggest that spring tides are a significant added risk. If an organisation the size of Watermans, which we assume employs “flood risk experts”, fails to identify the risk from tidal flooding, we suggest that a site manager with no flood risk expertise is equally likely to ignore this risk.

We also note that during the 2014 flooding river levels from the Embur came very close to the underside of the Hampton Court rail bridge (see below). We would welcome input from the Environment Agency and the applicant as to the potential impact of flooding if river levels had risen above the underside of the bridge.



Our view is that the trigger levels to close the carpark should be set at conservative levels well below the level of the undercroft carpark and that there is a public interest in all interested parties being aware of the trigger levels prior to determination.

If we reasonably assume that sustained floods, as per winter 2014, will be increasingly common then the Council should consider the dubious merits of transforming the current carpark which sits at average land levels of 8.2m AOD and has a very low risk of flooding into a car park at 7.25m AOD which has a significantly higher risk of flooding, this cannot be in the public interest.

Andrew Roberts

HCRC