
From: Karen Liddell [REDACTED]
Sent: 16 January 2020 15:23
To: Jennifer Margetts [REDACTED]
Cc: Kim Tagliarini [REDACTED] Paul Falconer [REDACTED] Stuart Selleck [REDACTED]
Shweta Kapadia [REDACTED]
Town Planning <tplan@elmbbridge.gov.uk>
Subject: FW: 2018/3810 Amended Application Objection

Dear Jenny

Cc tplan, Stuart Selleck, Karen Randolph, S Kapadia, Paul Falconer, Kim Tagliarini, Ray Townsend

PLEASE UPLOAD THIS EMAIL CHAIN AS AN OBJECTION ON BEHALF OF HCRC ON FLOOD MITIGATION MEASURES ONLY

Thank you for your reply yesterday. HCRC did pick up the EA objection letter dated 10th January uploaded early yesterday morning. You should have seen our immediate response from Ray Townsend times at 15.55 yesterday.

I was pleased to read in the EA letter that they require a significant amount of further detail on the void under the hotel and they need to comply with the Thames 2019 Model. This sounds like a lot of new work and revised drawings and documents. Whilst I am not an expert of flood risk and defences I am following this issue closely as a resident living in an area at increasing flood risk, and find it quite enlightening but pretty easy to follow. By chance yesterday I took part in a walkabout tour of the Lower Mole Flood Alleviation Scheme which was attended by 8-10 EA staff. I had an opportunity to have a direct dialogue with the senior civil engineer responsible for the long term maintenance, restoration and budgeting of the Lower Mole FAS and I must say he was committed, extremely professional, knowledgeable, down to earth, and concerned about the flood defences in the area as his family home is in the flood plain. When I asked him his views of building new development in the flood plain he promptly responded that it shouldn't happen but that Planning Authorities have spent many years ignoring the EA. I then asked him his views on flood compensation/attenuation tanks beneath new buildings for the purpose of storing flood water. His reply was that "they do not work" and when I asked why he said "they are just contrary to my hydraulics training and I've not got time to give you a lecture on hydraulics". So I asked him why EA staff are advising the LPA that voids under buildings are an appropriate mitigation and he said "because the EA is under pressure from national and local politicians and planners to come up with solutions to build new housing". **Can you please advise if Elmbridge LPA is putting pressure on the EA to find a solution to development on this site?** In my mind, it is clear that the LPA is going down a path of finding a solution that will not work and the existing community will suffer the consequences. I am ready to plan my house move before this development starts.

I thought I had better check the adopted policy on flood mitigation but I can find no references specifically to the use of compensation storage in CS26, or CS12 or DM 13. **Can you please advise if I am missing important wording?** However, I have found relevant policy and guidance in the February 2019 SFRA. **Why has the applicant not used this document in their supporting FRA?** They are referencing the May 2015 SFRA document when their revised FRA is dated Nov 2019, but do not make specific references. **Can you please ensure they give due regard to the current SFRA in any future submissions?** This policy and guidance is critical in the context of both the use of the car park and the void beneath the hotel as flood compensation as referenced in Section 5.7. Please note we are now aware that para. 5.7.5 states categorically that "*sole reliance on the use of underground voids to address the*

loss of flood plain storage is generally not acceptable on undeveloped land... **This is undeveloped land so why is a void being entertained?**

I do get some sense of despair in the EA's latest response as they conclude by stating that *"if this cannot be achieved we are likely to maintain our objection"*. **Can you please advise me and HCRC if as case officer you have given the applicant the opportunity to respond to the EA's objection?** Surely the timetables set and fees paid for this application and established in the PPA attached have expired and it is time now to make a recommendation on this application after 13 months, not forgetting the several years of pre-application discussion since the current owner purchased the site in 2014. **Please advise if there has been an addendum to the PPA?** You state below that *"I can confirm that I will be addressing all of the issues raised in the submitted letter of representation and consultation responses in the Committee report."* **Can you please advise what timeline you have agreed for the submission of amended drawings and documents, give a guarantee that a full 21 day public consultation will be carried out and when the committee report will be prepared and which committee date you are aiming for?**

I look forward to your replies to my questions in **bold** above.

Kind regards

Karen Liddell (on behalf of HCRC)

From: Jennifer Margetts [REDACTED]
Sent: 15 January 2020 16:27
To: Karen Liddell [REDACTED]
Subject: RE: 2018/3810 Amended Application Objection

Dear Karen,

We have now received the comments from the EA which is available to view on our website. The EA does state that they consider there is need for further details in their consultation response. I can confirm that I will be addressing all of the issues raised in the submitted letter of representation and consultation responses in the Committee report.

Kind regards

Jenny Margetts

Team Leader (North Area) | Planning Services | Elmbridge Borough Council
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From: Karen Liddell [REDACTED]
Sent: 10 January 2020 14:24

To: Jennifer Margetts <[REDACTED]>
Subject: RE: 2018/3810 Amended Application Objection

Dear Jenny

Thanks for your response.

You say you have spoken to the EA. Have you sent them my email asking for their comment as part of their response next week? I would have thought you had a view on whether full plans of the underground void are required from a planning law perspective. Are you able to comment at this stage, or will this matter be addressed in your Committee report which I am sure will be very long?

Kind regards

Karen (from HCRC)

From: Jennifer Margetts <[REDACTED]>
Sent: 10 January 2020 10:54
To: Karen Liddell <[REDACTED]>
Subject: RE: 2018/3810 Amended Application Objection

Dear Karen,

Happy New Year.

Thank you for your email I have forwarded this onto our business support team and asked them to register it as an objection to 2018/3810. I have spoken to the EA and they have confirmed that they will be releasing their consultation response by early next week. I will let you know when it is received and put a copy online as soon as possible.

Kind regards

Jenny Margetts

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From: Karen Liddell <[REDACTED]>
Sent: 07 January 2020 15:23
To: Jennifer Margetts <[REDACTED]>
Cc: 'Ray Townsend' <[REDACTED]>
Subject: 2018/3810 Amended Application Objection

Dear Jenny

Happy New Year. Please log this email as an objection on behalf of HCRC, and I would appreciate your response and action. This response is specific to the Amended Flood Risk Assessment only (further issues will be submitted separately)

The cover email of 22nd November 2019 from James Owen refers in paras. 1 & 2 to a newly introduced void under the Hampton Court Way building (HCW the hotel) and states that as there is no change to the height or elevations of the building no change is required to the submitted drawings. Please advise if you have agreed with this approach? I have looked at the revised FRA and specifically paras. 3.28 -3.38 where this void is described and illustrated. At 3.34 the void is described as 20m wide (no length is specified) and 1m high, and the illustration at Figure 5 shows a void on the ground floor layout without dimensions or a scale. In the context of the legal planning definition of development, this void would comprise an engineering operation below ground and would require planning permission and thus requires drawings to be submitted. Whilst it is for the EA to determine if this void would sufficiently mitigate the flood compensation resulting from this development, I do not see how they have sufficient information upon which to make a judgement. We do not know how far beneath the building the void sits, a section is required to show the positioning and drainage angles. We do not know how the void is connected to the southern sunken garden where it discharges as there is no commentary or illustration. We do not know how this void would be accessed for maintenance. A 1m deep void with 5 x 450mm pipes into it would be a lovely hotel for the rat population from the adjacent waterways, frequently seen in the area, and there are no measures to prevent rainwater run-off filtering into the void. A 1m high void could not be accessed by humans for checking and cleaning. In short this is a fudged solution that has not been thought out. A void could not be enforced by the planning authority without a full set of drawings. Can ask the EA before they submit their response if they consider they need a full set of drawings before they submit their comments. The issues I raise are matters of principal which in my professional opinion should not be addressed as a submission to satisfy a planning condition.

Paras. 3.25-27 of the FRA describe the flood compensation storage in the upper/undercroft car park and Appendix E on page 131 shows the openings in the east elevations that allow the water to pass into the building upon which we await the EA's response. There is no commentary or illustration of how the water escapes from the car park, or if it is required to be pumped out. The plan at page 130 shows the intended flood barriers to stairs, lifts and key services which will be necessary to evacuate people from the upper floors without access to their flooded vehicles, or indeed commuters vehicles. It is very unlikely that this car park will be designed to be a waterproof tank and thus human life and possessions will be at risk. I am sure most people in full knowledge would not choose to live here. The principle of flooding the car park also leaves the station without a car park. Whilst the current surface car park may become unusable during a flood I am certain the post flood clearance work would be far less challenging and costly.

I do hope the public have an opportunity to see the EA's response to these flood prevention measures before a recommendation is made on this application. Please alert me and HCRC at the earliest opportunity of the EA response.

Kind regards

Karen Liddell (for HCRC) 16 Summer Road KT8 9LS

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