70 Ember Farm Way
East Molesey
KT8 OBL
29th Sept 2023

Dear Jack,

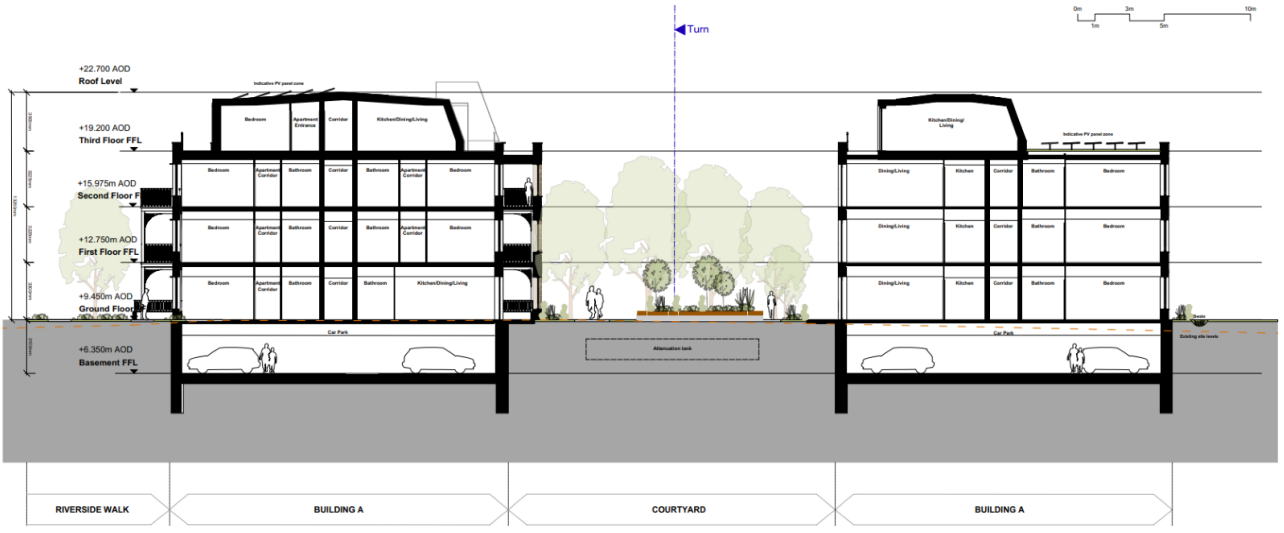
In addition to my other objections, I am submitting a further objection to the application 2022/3525 (Molesey Venture Site, Orchard Lane, East Molesey) in response to the applicant's Flood Risk Assessment Addendum submitted 26th Sept 2023 by KRS Enviro and the new information that the EA will not consider the risk of groundwater flooding as it is outside their remit. There are 3 points that I would like to raise:

(1) <u>Topography, New Structures and Impact on Conveyance Routes</u>

The applicant's latest addendum states: *"The site is currently occupied by existing buildings, the overall direction of the movement of water will be maintained within the developed site and surrounding areas.* ***The conveyance route (flow paths) will not be blocked or obstructed****.* ***The topography of the site will not be altered therefore; the overland flow routes will not be altered. The proposed development proposes minimal new structures*** *compared to the existing situation and will therefore allow floodwater to pass through the site with minimal effect on the conveyance routes. Therefore, mitigation measures are not required"*

It is unclear how the applicant can substantiate these statements

(i) According to the applicant's own data **the development will indeed alter the topography of the site.** As the letter itself states: *"The finished floor levels of the buildings and landscaped areas immediately adjacent to the buildings will be raised to 9.45AOD".* Meanwhile the applicant's flood risk assessment (dated 26.6.23) has a topographical survey for the site in appendix 2. This shows that current heights vary across the site. On the north east of the site around the current greenhouses and horticultural centre heights range from 8.6AOD to 9.09AOD. Building A and the surrounding land will be raised by +4-10% above the prevailing heights. Building A – proposed sections AA supplied by the applicant details the increase in heights shown by the red dotted line below.



Similarly, **it is unclear how the applicant's claims regarding proposing minimal new structures can be substantiated.**

(ii) **The development is significantly increasing the build over area of the site** both above and below ground. The image and table below, provided in the FRA, clearly show the increase in built over area which increases by over +1,091m^2 or +74% and a reduction in landscaping of -561m^2 or -15%. This is further exacerbated by noting that the buildings highlighted by the red circle are greenhouses / polytunnels which are temporary structures.

Application map showing current build footprint vs. proposed built footprint

Table 7 - Existing and Proposed Site Areas

Existing		Proposed	
Type of Development	Area (m²)	Type of Development	Area (m²)
Landscaping	3,783	Landscaping & Green roofs	3,222
Buildings	1,484	Buildings	2,575
Hardscape	2,240	Hardscape & Permeable Paving	1,710

As per the “Existing Area Schedule (Nov 2022) and the amended Design and Access Statement Addendum (June 2023), from a GIA perspective the increase is from 1,892m^2 to 9,992m^2 or some +428%.

Further, **it is unclear how the applicant's claims regarding overland flow routes not being altered and minimal effect on conveyance routes can be substantiated.**

(iii) **There are currently 4 conveyance routes between the buildings. The proposed development will reduce those to 2 routes**. This is shown in the mock up diagrams below.

Doing a basic comparison of current buildings vs new buildings demonstrates the likely reduction in conveyance routes North to South through the site. This reduction is being driven by the size and scale of Building A which fills almost the entire site from West to East. The site width is approximately 76m at the location of Building A and at this point there will only be 2 gaps across the site, 1.6m on the East and 8.0m on the west.
Further, Building A has significant subterranean development in the form of a basement carpark to a depth of 3.1m and an attenuation tank behind the building. This will surely reduce the ability of water to move underground.
It is unclear what modelling has been done to show the impact of the reduction in flood conveyancing routes on site, particularly as regards any consequential impacts off site - such as to the residents on Ember Farm Way. It would seem logical that the raising of the site height at Building A and the forced displacement of an increased volume of floodwater down the 1.6m gap on the eastern boundary would have an impact. Similarly it is not clear what assessment has been

done as to whether the raised levels, increased build footprint and courtyard style design will cause pooling of water at the rear of Block A.

Existing and Proposed footprint plan from FRA with mock up of floodwater flow routes including reduction in primary routes from 4 to 2

The NPPF paragraph 164 and Elmbridge policy CS26 states the development must be safe for its lifetime without increasing flood risk elsewhere. I would assert that the applicant has not proven this given the absence of the required models and assessments in their FRA.

(2) Sequential Test and Exception Test

As the site is in both Flood Zone 2 and 3 a sequential test would be applicable in this case. This site has not been sequentially tested and the Exception test applied. This is not in accordance with paragraphs 161-165 of the NPPF or Elmbridge LPA Flood Risk Management policies.

In my previous objection on the grounds of flooding I highlighted that a sequential / exception test had not been done. Indeed, the EA in both their responses have highlighted that the sequential test / exception test should be considered. I have seen no evidence one has now been completed. Why has one not been carried out for this site?

(3) Groundwater Flooding Risk from Basement Development

I still have concerns that the groundwater flood risk of the significant basement development, as highlighted in my previous flood objection, has not yet been property assessed.

Sustainable Urban Drainage in their response on 19/6/23 stated: "*Due to the proximity of the site to the River Ember the Environment Agency should be contacted to provide a consultation response in respect of the risk of fluvial flooding* ***and the consideration of groundwater impacts due to the proposed basement****."*

However, the EA have confirmed that their remit is fluvial flood risk only and so they have not assessed or commented on the groundwater risk. The EA says "it is for Elmbridge Borough Council as the Lead Local Flood Authority to comment on surface water and groundwater flood risk". Can you confirm who is responsible for assessing the groundwater flood risk associated with the basement development - and has this now been completed?

Summary

As you can see from the above there remains significant concern and doubt about the flood risk assessment for this application.

The applicant has now submitted three Flood Risk Assessments / Addendum for this application - none of which appear to comprehensively assess all the issues of the development. The latest flood risk assessment addendum seems to dismiss both the EA's and local residents' concerns without actually taking the necessary steps to provide the evidence to address those concerns.

I would urge the LPA to commission an independent Flood Risk Assessment and Basement Impact Assessment in this case in order to satisfy itself and local residents that the flood implications of the application have been fully assessed and mitigated.

Please refuse this application.

Kind Regards,

Katherine Le Clerc