Comments on behalf of Elmbridge Borough Council

Application Number:	2024/0498
Application Type:	Outline Application
Site:	Hersham Green Shopping Centre and Car Park Molesey Road Hersham Surrey KT12 4HL
Description:	Hybrid planning application for the redevelopment of Hersham Shopping Centre involving: Outline application (with all matters reserved) for the redevelopment of existing shopping centre car park to provide residential accommodation (Use Classes C2/C3), hard and soft landscaping, provision of new pedestrian access from Burwood Road and New Berry Lane and new vehicle access from New Berry Lane, provision of cycle and car parking and associated works. Full application for part demolition and refurbishment of existing shopping centre including provision of public toilets, car and cycle parking, hard and soft landscaping and other associated works.
Date:	18/06/2024
Prepared by:	Caitlin Evans (on behalf of Elmbridge Borough Council)
Overall recommendation	Refused- further information required

Introduction

The proposed refurbishment works to the Shopping Centre would reduce the footprint of development and all works are located to the north of the site. The proposed residential development would be on the existing (hard standing) customer car park at the rear of the shopping centre in the southern part of the site. The residential scheme seeks to erect two large residential blocks of significant scale, containing up to 109 units.

Given that the development is considered a major development the EA and LLFA are statutory consultees on this application. As such we have only commented on other flood risk sources.

Documents Reviewed

As part of responding to the above planning application, the following documents have been reviewed:

- Application Form (19/03/2024)
- North Site- Proposed Elevations North and East (14/03/2024)
- North Site- Proposed Elevations South and West (14/03/2024)
- North Site- Proposed Ground Floor Plan (14/03/2024)

- Proposed Street Scenes (14/03/2024)
- Block Plan (26/02/2024)
- Demolition Ground Floor Plan (26/02/2024)
- Existing Block Plan (26/02/2024)
- Phase Two Residential Landscape Concept (26/02/2024)
- South Site Parameter Plan - Land Use (26/02/2024)
- South Site Parameter Plan - Landscape (26/02/2024)
- Flood Risk Assessment and Drainage Strategy (2307230-02-REVB) (26/02/2024)
- Ground Investigation Report (26/02/2024)
- LLFA Sustainable Urban Drainage Consultation Response (02/04/2024)

Summary of Information

Based on the review of the above-mentioned documents, we have summarised the findings:

- The site is entirely located within Flood Zone 1 and the majority of the site has a very low risk of surface water flooding with areas of low-medium risk associated with the existing access road.
- The proposed new residential area is at very low risk of surface water flooding.
- The existing site is at risk of groundwater flooding. No basement levels are proposed within the plans.
- The groundwater investigation report concludes there is relatively shallow groundwater present at the site and suggests soakaway drainage will not be feasible. Groundwater was monitored at a depth of between 2.1m to 2.5m below ground level.
- There are existing SW and FW sewers on the site, which are proposed to be maintained and re-utilised for the proposed development.
- The drainage strategy concludes the underlying bedrock and perched water table means infiltration techniques are unlikely to be viable, there are no watercourses to discharge to, therefore connections to existing surface water drains are proposed.
- There is potential to incorporate green roofs at reserved matters stage subject to suitability and coordination with the proposed structures, lift shafts, M&E plant and EV panel requirements.
- Post development discharge is discussed within the FRA and are compared with existing brownfield rates to show a betterment.

Review of the Information

We have reviewed the information and have the following comments:

- CS26 of the Elmbridge Core Strategy (adopted 2011) is a policy to reduce overall and local flood risk in the borough. It requires that new development is located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed. Full guidance is set out within the Flood Risk SPD (2016).
- Supporting guidance under the Elmbridge Flood Risk SPD (adopted 2016), paragraph 3.2.25 states that:

  'If a site is indicated to either have potential for groundwater flooding to occur at the surface or for properties situated below ground level the Council will require a detailed ground investigation report and hydrology report to be prepared as part of a FRA. Development, particularly subsurface development e.g. basements, in these areas may affect groundwater flows. Even though the displaced water may find another course this may have implications for the surrounding area.'
- A ground investigation report has been provided as part of the application This report should be used to inform detailed design when at the full application stage for the residential development. Currently,

plans show no basement levels are proposed, therefore groundwater risk is minimised.

- Elmbridge Borough Council Level 1 Strategic Flood Risk Assessment (published April 2024) paragraph 4.3.2 states:

  'The Sequential Test should be applied to 'Major' and 'Non-major development' proposed in areas at risk of flooding.'

- Paragraph 4.3.5 notes:

  'It should be noted that the Sequential Test does not need to be applied in the following circumstances:

  - *Individual developments proposed on sites which have been allocated in development plans through the Sequential Test.*
  - *Minor development, which is defined in the NPPF as:*
    - *minor non-residential extensions: industrial / commercial / leisure etc. extensions with a footprint <250m2.*
    - *alterations: development that does not increase the size of buildings e.g. alterations to external appearance.*
    - *householder development: for example, sheds, garages, games rooms etc. within the curtilage of the existing dwelling, in additional to physical extensions to the existing dwelling itself. This definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling e.g. subdivision of houses into flats.*
  - *Change of Use applications, unless it is for a change of use of land to a caravan, camping or chalet site, or to a mobile home site or park home site.*
  - *Development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea) unless the SFRA, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change).*
  - *Redevelopment of existing properties (e.g. replacement dwellings), provided they do not increase the number of dwellings in an area of flood risk (i.e. replacing a single dwelling with an apartment block).*

- The proposed development is located entirely within Flood Zone 1 on the EA Flood Map for Planning with a low probability of flooding from rivers of the sea. The EBC SFRA Appendix A mapping also identifies the site as being in Flood Zone 1. The majority of the site also has a very low risk of surface water flooding; therefore, a sequential test is not required as part of the application.

- CS26 of the Elmbridge Core Strategy (adopted 2011) paragraph 4 states:

  'New development will need to contain SuDS, in line with the Council's Climate Neutral Development Checklist. All development within flood zones 2 and 3 will require surface water run off to be controlled, as near to its source as possible and at greenfield rates. Where SuDS have not been used in these areas the applicant should justify these reasons.'

- Within the FRA and Drainage Strategy, brownfield runoff rates are considered for the residential area and proposed opportunities for SuDS are discussed, however no proposals for SuDS or calculations are provided for the northern catchment shopping centre area.

- Paragraph 5.4.18 of the EBC Level 2 SFRA (2024) draws upon the national non-statutory Technical Standards when discussing peak flow control, it states:

  'For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year (100% AEP) rainfall event and the 1 in 100 year (1% AEP) rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event but should never exceed the rate of discharge from the development prior to redevelopment for that event.'

- The LLFA were consulted regarding the proposed sustainable drainage (ref LLFA-EL-24-0392). They note that associated discharge rates and storage volumes should be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off including multifunctional sustainable drainage systems. As such we require an updated conceptual plan and supporting

calculations in accordance with this to be submitted.

- The LLFA also note that additional required drainage details must be submitted and approved prior to the commencement of any phase of the development in line with the LLFA comments:

  "a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.

  b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. If infiltration is deemed unfeasible,

  c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).

  d) Details of any existing surface water drainage infrastructure to be retained, whether it is fit for purpose for the lifetime of the proposed development.

  e) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

  f) Details of drainage management responsibilities and maintenance regimes for the drainage system.

  g) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational."

- As noted by the LLFA the above should be conditioned on the application.
- Please see the recommended next steps below.

Recommendations

Based on the review of the above-mentioned documents, we recommend the following:

- We recommend the proposed surface water drainage strategy is updated for the site to demonstrate that rates can be restricted to/as practicably close to greenfield rates.
- Further information regarding the surface water drainage scheme will be required to be submitted to the Local Planning Authority prior to the commencement of any phase of the development. The conditions set out in the LLFA letter ((ref LLFA-EL-24-0392) are recommended to be placed on the application.

Document Control

Job Number	Issue	Description	Originator	Approver
2024/0498	1	Outline Application	Caitlin Evans 18.06.2024	Tamsin Jones 25.06.2024