### Jackie pooley

From:

Planning Apps

Sent:

12 March 2019 15:41

To:

Plan Scan DC Officers

Cc:

Catherine Loveday

Subject:

FW: S Glos - PT18/6450/O - Land at Park Farm - Flood Risk Information

Attachments:

Flood Risk Response - EA.pdf

From: Sustainable Places, NWX [mailto:nwx.sp@environment-agency.gov.uk]

Sent: 12 March 2019 10:54

To: FTozer@savills.com; Planning Apps <planningapplications@southglos.gov.uk>; Catherine Loveday <Catherine.Loveday@southglos.gov.uk>

Subject: FW: S Glos - PT18/6450/O - Land at Park Farm - Flood Risk Information

#### **Dear Felicity**

Thank you for providing us with additional details regarding the above site. We are unable to formally respond to this until the Local Planning Authority have indicated to us that they have received and accepted the same documentation.

Documentation received:

Peter Brett Flood Risk Response letter 4 Mar '19

To LPA can you please confirm acceptance of the details listed above. Once we have received this confirmation we can start our 21 day consultation period.

If you have not sent the details to the LPA, or they have not accepted them, then if appropriate we can enter into a cost recovery agreement with yourselves to provide advice outside of the formal planning consultation process.

The process set out above is necessary to ensure that our resources are used to provide the right input to the right audience at the right time and we would appreciate your co-operation in achieving this.

#### Regards

#### **Kevin Date**

## Planning Assistant Sustainable Places

Tel: 02030 250233

The Environment Agency has an email file transfer limit of 8MB. If you wish to send large files to my team please reply to our team email <a href="mailto:nwx.sp@environment-agency.gov.uk">nwx.sp@environment-agency.gov.uk</a> and request a Sharefile link to be emailed to you. With this you can upload files of larger sizes to us.

www.gov.uk/floodsdestroy

# DO YOU KNOW WHAT TO DO?



From: Felicity Tozer [mailto:FTozer@savills.com]

Sent: 08 March 2019 15:11

To: Bull, Richard < <a href="mailto:richard.bull@environment-agency.gov.uk">richard.bull@environment-agency.gov.uk</a>; Catherine Loveday@southglos.gov.uk</a>>

Cc: rebecca.mitchell@barwoodland.co.uk; Robert Holloway <rholloway@peterbrett.com>

Subject: 5 Glos - 18/6450 - Land at Park Farm - Flood Risk Information

Hello Richard,

I attach our response to the objection received to the above planning application from the Environment Agency (dated 28 Jan 19).

I trust this information provides the necessary information to remove this objection.

If you require any points of clarification in regard to the letter and submitted FRA, then please do not hesitate to let us know.

Thanks Felicity

Felicity Tozer Associate Planning

Savills, Embassy House, Queens Avenue, Bristol BS8 1SB

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Your ref: WX/2019/132577/01-L01
Our ref: 000/4001/05/AH/LD/CMq

04 March 2019

Richard Bull
Sustainable Places -- Planning Advisor
Environment Agency
Rivers House
East Quay
Bridgwater
Somerset
TA6 4YS

Dear Mr Bull

#### **RE: PLANNING APPLICATION - PT18/6450/O**

Thank you for your comments regarding the Flood Risk Assessment (FRA) submitted in support of outline planning permission for mixed development at Land West of Park Farm, Thornbury. Your comments stated that the Environment Agency (EA) object to the proposals on the ground that "it has not been demonstrated that the development can be made safe for its lifetime taking into account the impacts of climate change". The following letter has been produced by PBA, now a part of Stantec (PBA), in response with the aim of providing adequate information to remove this objection.

As noted within your commentary, the majority of the proposed development site is located within Flood Zone 1, with areas of Flood Zones 2 and 3 also presented. It is our understanding that Flood Zones 2 and 3 in the west of the site are predominantly tidally influenced, whilst in the south and east of the site they are fluvially influenced. In accordance with the recommendations made within the 'Flood Risk and Coastal Change' Planning Practice Guidance, the proposed masterplan has been developed using the sequential approach so that appropriate land uses are proposed within the various Flood Zones. This has resulted in all built development being located within Flood Zone 1 and only amenity open spaces within Flood Zones 2 and 3.

The FRA stated that "to robustly mitigate against the potential impact of climate change it is recommended that finished floor levels (FFLs) be set to 11.0mAOD or 600mm above the ground level at the edge of Flood Zone 2 adjacent to the development parcel, whichever is highest". A plan was submitted within the FRA which identified areas where FFLs were to be set to 11.0mAOD but this did not include areas where FFLs will need to be 600mm above the ground level at the edge of Flood Zone 2. Please find enclosed with this letter sketch 39209/4001/SK03 indicating these areas.

Your commentary later states that to provide a more robust assessment, "a 25% climate change scenario should be run on the Hydrock 1D-2D ISIS-TUFLOW 2015 model". Correspondence between ourselves (dated: 6 December 2017, ref: 67533-WX) indicate that the EA could not provide a copy of the model (due to not holding the intellectual property rights) in order for PBA to undertake this assessment. Hence, PBA have been unable to undertake this assessment at this stage.

hpba.inthrithProjects\39209 West of Park Farm, Thombury\4001 Hydro Task\_TA-HYD\Reports\05 EA Objection Letter\190304\_Thombury\_EA Objection Letter docx

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However, taking account the sequential approach applied to the proposed development masterplan; locating all built development outside of Flood Zone 2, and the proposals to raise FFLs to 11.0mAOD or 600mm above existing ground at the edge of Flood Zone 2, the proposed development has been demonstrated to be safe for its lifetime when taking account of the impacts of climate change. This assessment is considered sufficient for fixing parameters for FFLs within the development, which can be appropriately secured via a planning condition on the outline consent. This would ensure the compliance of future reserved matters applications with these requirements.

We trust that the above information and enclosure is sufficient to overcome the objection by the EA.

Yours sincerely



Amy Hensler
Director of Flood Risk
For and on behalf of
PETER BRETT ASSOCIATES LLP

Enc: 39209/4001/SK03 Rev B - Climate Change Mitigation

