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Your ref: WA/2016/122898/06-L01 (CDC ref: 16/00472/OUT)

Our ref: 33390//CBH/PCJ/RMF

02 November 2018

Environment Agency
Planning Department

By email: Planning_THM@envronment-agency.gov.uk

Attn: Sam Pocock

Dear Sam

RE: OUTLINE PLANNING APPLICATION FOR 200 DWELLINGS GRUNDON SERVICES, MERTON STREET, BANBURY OX16 4RN RESPONSE TO EA COMMENTS DATED 28/11/18 ON FLOOD RISK

I have been forwarded the latest Environment Agency (EA) response dated 23rd October 2018 providing the EA's further comments on this application, which maintains the holding objection. This is disappointing, as we had provided clarifications to address EA concerns in our previous response of February 2018.

The latest EA comments are solely in relation to the undercroft parking void space and given the nature of the submission – i.e. an outline application – this could have been quickly addressed if we had been contacted earlier.

> ***"We are concerned, that the proposed undercroft parking drawing prepared by JSA Architects, reference PL-127, has not confirmed whether the proposed undercroft void would be set above the 1 in 100 year flood level with an appropriate allowance for climate change. As no height for this void has been specified on this drawing, it has not been demonstrated whether flood flows would be impeded and if flooding would occur elsewhere.***

Details of the floodplain compensation measures in Section 5.2 of the FRA and associated PBA Drawing 33390/4001/004, further supplemented by PBA Drawing 33390/4001/005 accompanying the previous PBA response.

As noted on Drawing 004, the proposed ground floor level of each of the undercroft areas is denoted by the red level markers provided for each block. These are generally set at the typical external ground level of each unit. The majority of these are therefore set above the reference flood level by virtue of the general ground levels, although shallow flooding would occur in the +35% climate change scenario to those units at the south-eastern end of the site and on the southern site boundary.

As the ground level undercroft areas are fully open in accordance with EA requirements, they would not cause any detrimental impact on flood flows – and it should be emphasised that the site is not located on a conventional flood flow route in any case; for flooding to occur – and note it only occurs in events more extreme than the current 1 in 100 annual probability event – the flooding is via backing up of floodwater over the site from the area to the east.

> ***"We note that the proposed undercroft parking drawing prepared by JSA Architects, reference PL-127, does not show any supporting structures such as pillars for the floors located above the undercroft parking area. If supporting structure such as pillars are proposed within the undercroft parking area to provide structural support for the floors***

above this area, then these should be clearly drawn on a revised drawing. Please note, if these structures are proposed within the floodplain, and would therefore result in a loss in floodplain storage, then floodplain compensation must be provided for these"

The drawing was illustrative purely to show that the ground floor level consisted of undercroft areas, which would be designed to allow flooding. We would reiterate this would only occur in the climate change scenarios, the site is defended by the Banbury Flood Alleviation Scheme and is not impacted than the current 1 in 100 annual probability event.

It is fully accepted that there would in reality be a support structure that would result in a nominal impact to the floodplain storage. This had been allowed for in any case in the storage calculations – Note 1 on Drawing 004 confirmed that a 10% allowance was included for such elements, which is typical for such arrangements. As an outline scheme the specific ground level layout has not been developed to the stage where this can be accurately quantified, but based on previous schemes the 10% is considered an acceptable and conservative estimate.

We hope that the above further clarifications address the outstanding concerns. We would reiterate that the FRA demonstrates the principle that the development would provide a significant overall improvement in floodplain storage capacity, and this will inevitably be refined as a detailed scheme is produced.

Yours sincerely

Richard Fisher
Senior Associate
For and on behalf of
PETER BRETT ASSOCIATES LLP