

FLOOD RISK ASSESSMENT

Date	28 October 2024	Confidentiality	Public
Subject	Sainsbury's Supermarket, Lower Richmond Rd., Richmond TW9 4LT		

INTRODUCTION

The aim of this report is to provide an assessment of flood risk for the proposed scheme at Sainsbury's Supermarket, Lower Richmond Rd., Richmond TW9 4LT. The National Planning Policy Framework ('NPPF')(2023) states at Footnote 59 that 'A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3'.

Richmond-Upon-Thames Council are of the view that the Site falls within an area at risk of flooding. We do not agree but we have prepared this note in order to demonstrate this and to comply with request of the Council to allow the application to be validated.

THE SITE

The site is shown in Figure 1 below. The site boundary comprises part of the car park of the Sainsbury's store.

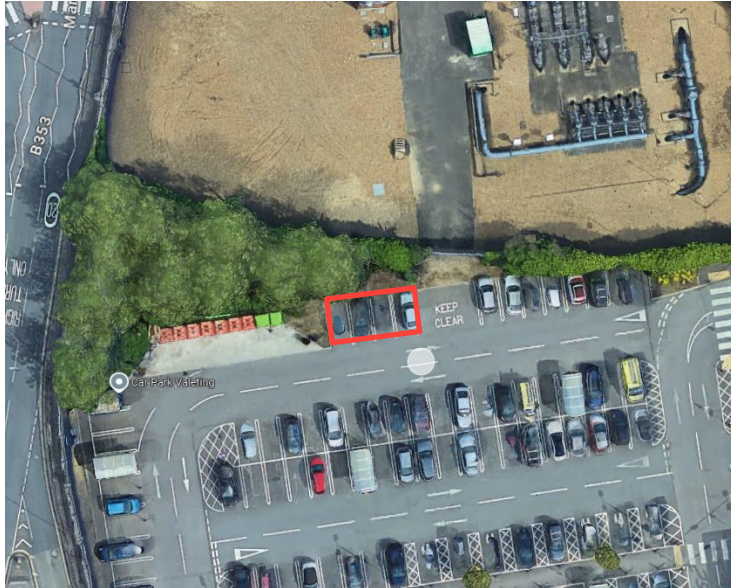


Figure 1: Site Location

The Flood Risk Map for Planning is shown at **Appendix 1** of this report. It demonstrates that the site falls within Flood Zone 1 for flooding from Rivers and the Sea, and that there is very low risk of flooding from surface water.



THE PROPOSALS

The proposals involve the construction of a retail pod to be occupied by We Buy Any Car (Use Class E), in the existing Sainsbury's car park. The pod will extend to 15sqm / 17sqm (GEA) so is minor in nature.

PLANNING POLICY

The NPPF states at Paragraph 173 that 'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.'

Paragraph 174 states that 'Applications for some minor development and changes of use should not be subject to the [flood risk] sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 59.'

In terms of Local Planning Policy, Policy DM4 of the Core Strategy (2012) requires a Flood Risk Assessment for major development proposals within Flood Zone 1 of one hectare or more and all new development in Flood Zones 2 and 3.

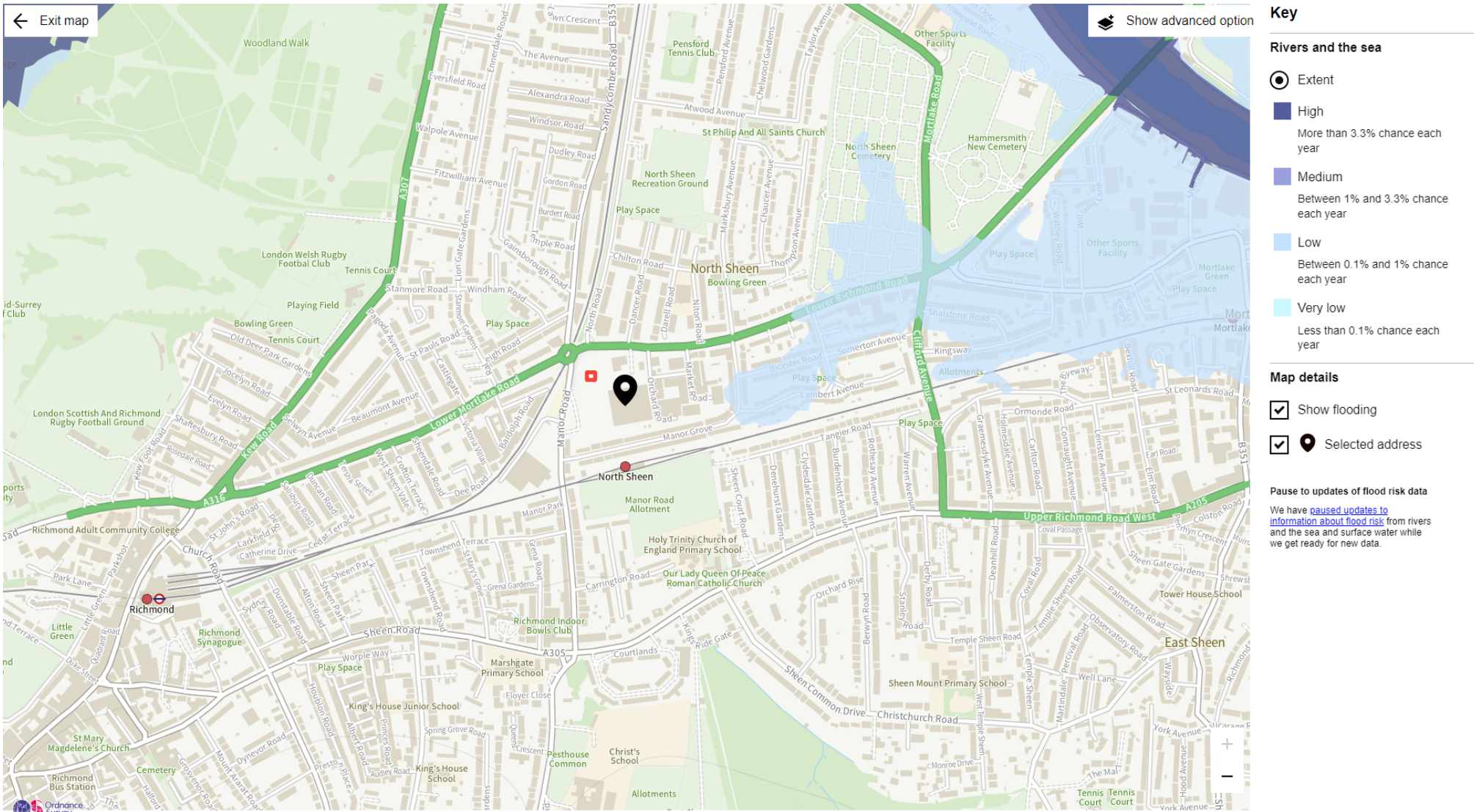
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The location of the pod is in an area of existing hardstanding associated with the existing Sainsbury's store. The proposals would therefore not introduce any new development onto the site. The proposed footprint of the pod (15sqm) does not comprise a significant building or development footprint which would materially affect the surface water discharge of the site. The proposed structure is negligible in size and footprint in the context of the wider site. In addition the pod is at a finished floor level that is 20mm higher than the existing hardstanding.

CONCLUSION

In light of the above, the proposals do not increase the flood risk anywhere on the site or the surroundings in accordance with Paragraph 173. The proposals do not trigger the need for a flood risk sequential test or an exemption test in accordance with Paragraph 174. Accordingly the proposals comply with Policy DM4 of the Core Strategy and Paragraphs 173 and 174 of the NPPF (2023).

Appendix 1 – Flood Risk Map for Planning (Rivers and the Sea)



Key

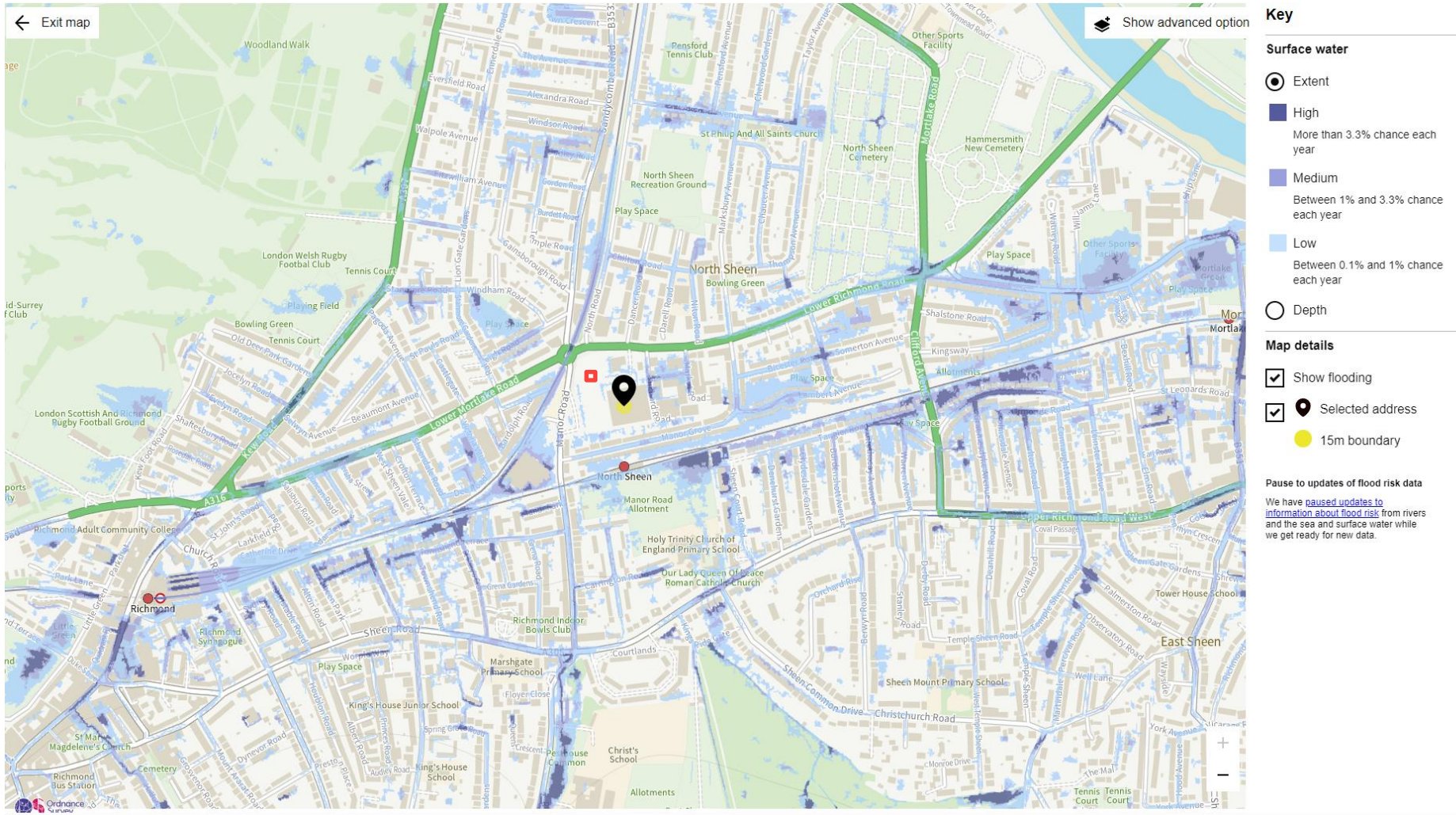
- Rivers and the sea**
- Extent
 - High
More than 3.3% chance each year
 - Medium
Between 1% and 3.3% chance each year
 - Low
Between 0.1% and 1% chance each year
 - Very low
Less than 0.1% chance each year

Map details

- Show flooding
- Selected address

Pause to updates of flood risk data
 We have [paused updates to information about flood risk](#) from rivers and the sea and surface water while we get ready for new data.

Appendix 2 – Flood Risk Map for Planning (Surface Water)



Householder and other minor extensions in Flood Zones 2 and 3

Applications for planning permission should be accompanied by a completed form. An electronic version can be submitted by 'printing' it to a PDF writer.

This guidance is for domestic extensions and non-domestic extensions where the additional footprint created by the development does not exceed 250 sq. metres. It should NOT be applied if an additional dwelling is being created, e.g. a self contained annex.

We recommend that:

Planning Authorities:

- 1) Refer the applicant to the standing advice pages on the Environment Agency website or provide them with a copy of this page for them to include as part of the planning application submission.
- 2) Check the planning application to ensure that one or other of the mitigation measures from the table below has been incorporated.

Applicants:

Complete the table below and include it with the planning application submission. The table, together with the supporting evidence, will form the Flood Risk Assessment (FRA) and will act as an assurance to the Local Planning Authority (LPA) that flood risk issues have been adequately addressed.

Applicant to choose one or other of the flood mitigation measures below	Applicant to provide the LPA with the supporting information detailed below as part of their FRA	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'
Either ; Floor levels within the proposed development will be set no lower than existing levels AND, flood proofing of the proposed development has been incorporated where appropriate.	Details of any flood proofing / resilience and resistance techniques, to be included in accordance with ' <i>Improving the flood performance of new buildings</i> ' CLG (2007)	Yes
Or; Floor levels within the extension will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones	This must be demonstrated by a plan that shows finished floor levels relative to the known or modelled flood level. All levels should be stated in relation to Ordnance Datum ¹	

Subterranean/basement extensions

Due to the risk of rapid inundation by floodwater basements should be avoided in areas at risk of flooding. The LPA may hold additional guidance for basement extensions.

Self-contained basement dwellings are 'highly vulnerable' development and should not be permitted in Flood Zone 3. We are opposed to these developments.

Continued...

¹ Ordnance Datum or the abbreviation 'OD' is the mean level of the sea at Newlyn in Cornwall from which heights above sea level are taken. The contour lines on Ordnance Survey maps measure heights above OD for example, though these are not accurate enough for a flood risk assessment..

Cumulative impact of minor extensions and the removal of Permitted Development rights.

There is potential for the cumulative impact of minor extensions to have a significant effect on flood risk. Where local knowledge (Strategic Flood Risk Assessment held by the LPA/information provided by the parish council) suggests this is the case the guidance contained in FRA guidance note 2 should be applied. FRA guidance note 2 can also be applied where permitted development rights have been removed for flood risk reasons. The Environment Agency does not usually comment on minor development in this category.

Permeable paving and changes to permitted development rights for householders

On the 1st October 2008 the General Permitted Development Order (GPDO) in England was amended by the Government (Statutory Instrument 2008 No. 2362).

One of the changes introduced by the GPDO amendment is the removal of permitted development rights for householders wishing to install hard surfacing in front gardens which exceeds 5sq. metres (i.e. 1m x 5 m) without making provision to ensure permeability. This means that use of traditional materials, such as impermeable concrete, where there is no facility in place to ensure permeability, requires an application for planning permission.

In order to help and advise householders of the options for achieving permeability and meeting the condition for permitted development status the Department for Communities and Local Government (CLG) has produced guidance on permeable paving which can be found on the following link <http://www.communities.gov.uk/publications/planningandbuilding/pavingfrontgardens>

The Environment Agency supports the GPDO amendment as it is in line with the recommendations of the Pitt Report regarding the need to better tackle the impact of surface water flooding. However, Local Planning Authorities should determine these applications in accordance with the CLG guidance **without** consulting the Environment Agency.

End of comment