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**From:** Sarah James  
**Sent:** 23 November 2010 11:16  
**To:** Development Control  
**Subject:** FW: Cautletts Close: 10/04015

Sarah James

Senior Planning Officer  
Major Development Team

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<http://www.bathnes.gov.uk/environmentandplanning/planning/Pages/default.aspx>

-----Original Message-----

**From:** Reading, Andy [mailto:[andy.reading@environment-agency.gov.uk](mailto:andy.reading@environment-agency.gov.uk)]  
**Sent:** 19 November 2010 16:31  
**To:** Sarah James  
**Cc:** Stela Klebankiewicz  
**Subject:** Cautletts Close: 10/04015

Hi Sarah,

Thanks for your phone call yesterday regarding the above development proposal. Understand that you felt a further email from us regarding the site would be useful to assist you in communicating the issues to members.

As discussed we have assessed the FRA and the other correspondence from the applicant based on the evidence of sources of flooding we have available to us. Most notably our flood zone map and the Bath and North East Somerset's Strategic Flood Risk Assessment (level 1 and 2). Based on this evidence and our review of the FRA we consider the development to meet the requirements of PPS25 and have removed our objection subject to the conditions as detailed in our latest letter.

We understand that there have been a number of concerns raised regarding flood risk at the site from members of the public, for example from groundwater and/or off site surface water. Stela has also usefully communicated how any significant offsite surface water runoff from higher ground could affect the site given that there is no formal drainage along withies lane, and has suggested some ways in which this could be mitigated for by the developer.

We fully support the local drainage engineers comments in that if there is a source of flooding which affects the site, such as surface water, groundwater or sewer flooding, the developer should be adequately addressing this. I understand the drainage engineer for the applicant has been in discussions with Stela regarding areas where overland flow may be an issue and potential ways this could be addressed (email dated 18/11/2010 from Roger Williams).

I have discussed this with our flood risk technical specialist and at present we do not have sufficient evidence before us to show that significant offsite surface water and/or groundwater is causing problems to the site to a degree where we would consider reinstating an objection. I went out on site yesterday (email sent on the 18/11/2010 with photos attached) and the main area of note was in the south east corner, where due to there being no formal drainage there was some flow of water along withies lane into the site where it formed a puddle in this corner of the site (photo's 2, 3, 4a and 4b attached to my email yesterday). This suggests there is an issue to be addressed in terms of drainage into the site and it will be key that through the discharge of the surface water drainage condition that this is looked at in detail and it is ensured that drainage into this part of the site is adequately conveyed through the site to ensure it does not pose a flood risk to the development or to third parties. From discussing it with our flood risk technical specialist it is however not considered enough evidence to be considered a showstopper and reinstate an objection due to an inadequate FRA.

If an 'inadequate FRA' was given as a reason for refusal at present our organisation would struggle in terms of presenting enough evidence at appeal to show the applicant has not adequately considered all sources of flooding.

As discussed PPS25 describes how FRA's should consider all sources of flooding to the development and para E9 of PPS25 allows the LPA to require further FRA information where ourselves, internal drainage boards or other bodies have indicated there are problems. Therefore if any evidence of significant problems or flooding from other sources comes to light please let me know and I can reconsider our representations to the planning application.

Hope this is helpful. If you have any queries please contact me on the number below.

regards,

**Andy Reading**  
Planning Liaison Officer  
Wessex  
South West Region  
Environment Agency

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