



**To:**  
**All members of the**  
**Corporate Policy and Resources**  
**Committee**

*Please reply to:*  
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Date: 5 July 2024

## Supplementary Agenda

### **Corporate Policy and Resources Committee - Monday, 8 July 2024**

Dear Councillor

I enclose the following items which were marked 'to follow' on the agenda for the Corporate Policy and Resources Committee meeting to be held on Monday, 8 July 2024:

#### **7. Local Plan - Resumption of Examination**

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Committee is asked to:

- 1) Make a recommendation to Council to propose a Main Modification to the Inspector to remove Bridge Street car park/Hanover House/Sea Cadet building (ST4/002) and Riverside surface car park (ST4/010) as site allocations from the Local Plan
- 2) Make a recommendation to Council to propose a Main Modification to the Inspector to agree to new policy wording in relation to site allocations at risk from access and egress issues (flooding)
- 3) Make a recommendation to Council that the Chair of the Environment & Sustainability Committee write to the Inspector with further proposed Main Modifications (if agreed) in order to progress the Local Plan back to Examination.

Yours sincerely

Karen Wyeth  
Corporate Governance  
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To the members of the Corporate Policy and Resources Committee

Councillors:

J.R. Sexton (Chair)

C. Bateson (Vice-Chair)

J.R. Boughtflower

M.J. Lee

O. Rybinski

N. Islam

K. Howkins

M. Bing Dong

L. E. Nichols

K.M. Grant

M. Beecher

H.R.D. Williams

J. Button

R.V. Geach

S.M. Doran

Substitute Members:

Councillors: M.M. Attewell, D.C. Clarke, S.A. Dunn, M. Gibson,  
A. Gale, S.N. Beatty and J.T.F. Doran

# Corporate Policy & Resources Committee

Date of meeting: 8 July 2024



<b>Title</b>	Local Plan – Resumption of Examination
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	Heather Morgan, Group Head Place, Protection and Prosperity Jane Robinson, Interim Joint Strategic Planning Manager
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	N/A
<b>Corporate Priority</b>	Community Addressing Housing Need Resilience Environment Services
<b>Recommendations</b>	<p><b>Committee is asked to:</b></p> <ol style="list-style-type: none"> <li>(1) Make a recommendation to Council to propose a Main Modification to the Inspector to remove Bridge Street car park/Hanover House/Sea Cadet building (ST4/002) and Riverside surface car park (ST4/010) as site allocations from the Local Plan</li> <li>(2) Make a recommendation to Council to propose a Main Modification to the Inspector to agree to new policy wording in relation to site allocations at risk from access and egress issues (flooding)</li> <li>(3) Make a recommendation to Council that the Chair of the Environment &amp; Sustainability Committee write to the Inspector with further proposed Main Modifications (if agreed) in order to progress the Local Plan back to Examination</li> </ol>
<b>Reason for Recommendation</b>	<p>The Local Plan Examination hearings were paused in summer 2023. A number of proposed Main Modifications were agreed by Environment &amp; Sustainability Committee on 29 February 2024. The recent response from the Environment Agency (EA) now requires this committee to recommend to Council whether or not further proposed modifications need to be agreed and put to the Inspector.</p>

## 1. Summary of the report

What is the situation	Why we want to do something
<ul style="list-style-type: none"> <li>The Local Plan Examination is currently 'on pause'. Proposed Main Modifications were agreed by E&amp;S committee 29 February 2024.</li> <li>Considerable recent progress has been made with the EA.</li> <li>There are now just 2 sites the EA want to see removed, alongside a request for new policy wording around site allocations at risk from access and egress flooding issues (including reference to dry islands)</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan has been paused for a year, and the key outstanding issue is the position of the EA.</li> <li>Further EA correspondence now requires a decision on whether further Main Modifications are needed.</li> <li>A decision is required so that we can go to the Inspector have certainty around the Local Plan</li> </ul>
This is what we want to do about it	These are the next steps
<ul style="list-style-type: none"> <li>This report sets out the recent response from the EA, and the options for deciding whether or not this Committee recommends to Council that we request further Main Modifications to the Local Plan in order to resume the Examination hearings and progress the Plan to adoption</li> </ul>	<ul style="list-style-type: none"> <li>Make a recommendation to Council to remove two current site allocations</li> <li>Make a recommendation to Council on new policy wording on site allocations at risk from access and egress flooding issues (including reference to dry islands)</li> <li>Request chair of E&amp;S committee to write to the Inspector to ask him to consider the proposed Main Modifications and resume the Local Plan Examination</li> </ul>

- 1.1 Considerable progress has been made with the Environment Agency (EA) to address their flooding concerns. It will be for this Committee to recommend to Council whether further limited proposed Main Modifications are made to the Local Plan to overcome their outstanding policy matters.
- 1.2 Full Council on the 18th July will consider the recommendations from this Committee as the Council may at any time resume responsibility for a function

and exercise that function despite any delegation, which in this case would be within the remit of the Environment and Sustainability Committee. This avoids the necessity of calling an Extraordinary E&S Committee meeting.

- 1.3 The EA's concerns/matters relate to two site allocations and the need for new policy wording on site allocations at risk from access and egress flooding issues (including dry islands). It will be for the Inspector to decide whether to accept any proposed Main Modifications we propose to make, and to move back to Examination or not.

## **2. Key issues**

### Background

- 2.1 The Spelthorne Local Plan was submitted to the Secretary of State on 25 November 2022 for Examination, following over five years of preparation and public consultation. One week of hearings took place at the end May, before an Extraordinary Council meeting on 6 June 2023 agreed to pause the hearings for 3 months to allow for councillor training. At CPRC on 26 June 2023, it was agreed that Catriona Riddell Associates be appointed as a 'critical friend' to undertake an external review of the Local Plan (with that appointment being agreed by Council on 19 July 2023).
- 2.2 On 14 September 2023, an Extraordinary Council meeting took place to consider the future direction of the Local Plan, including whether (1) the Local Plan continued with further robust risk management measures; (2) a further pause be agreed until the publication of the National Planning Policy Framework (NPPF); (3) withdraw the Local Plan from Examination. On the day of the meeting, the Council received a Ministerial Direction letter removing our ability to withdraw the Local Plan (option 3). This meant Council could only consider whether to continue with the Local Plan with risk management measures or agree a further pause until publication of the NPPF.
- 2.3 Further detail can be found in the background section of the report to extraordinary Environment & Sustainability (E&S) Committee on 29 February 2024. [Agenda for Environment and Sustainability Committee on Thursday, 29 February 2024, 7.00 pm - Spelthorne Borough Council](#)

### Examination and proposed modifications

- 2.4 The provisions under Para. 230 of the NPPF mean that Spelthorne's Local Plan at this advanced stage will be examined under the previously published NPPF (not the new version which came into effect in December 2023). The procedural guidance for Local Plan examinations makes it clear it is the Inspector's decision to consider modifications only if they are necessary to make the Plan sound and/or legally compliant. If the Inspector is not able to accept the suggested modifications as necessary and/or if they would result in a significant change to the spatial strategy of the Local Plan and the Council still wishes to progress with the amendments, it would normally open to him to suggest the Council withdraws the Plan from Examination and draft a new Plan for submission.

### EA and Preliminary Statement of Common Ground

- 2.5 A full Statement of Common Ground has yet to be signed between the Council and the Environment Agency (EA). A Preliminary Statement of

Common Ground between the Environment Agency and Spelthorne Borough Council was agreed by the EA on 22 May 2023 and published on 23 May 2023. This agreed which version of the Thames (Hurley to Teddington) modelling would be used as a basis of discussion during the Examination hearings (2019). The statement also simply set out the titles and dates of the evidence produced and that we had agreed to continue to work together. We also agreed to continue to work with them to agree a more comprehensive Statement of Common ground to set out the areas of agreement and any remaining areas of disagreement between the two parties.

#### E&S Committee 29 February 2024

- 2.6 The report to E&S Committee on 29 February 2024 set out that Spelthorne found itself in the position of wishing to make changes to deliver a Local Plan it could support on behalf of those residents of the Borough who were dissatisfied with the Plan as submitted, but within the bounds of the procedural guidance for this stage of the Examination and in light of the Minister's directive. That document asked the E&S Committee to make decisions on (1) various options for Green Belt sites; (2) options on flood risk sites; (3) whether to retain or withdraw the Staines Development Framework; and (4) to request the Inspector to consider the modifications and resume the Local Plan Examination.
- 2.7 The Committee:
1. *“Resolved to propose to the Inspector to remove all Green Belt allocations from the Local Plan with the exception of the two allocations that meet the need for Gypsy, Traveller and Travelling Showpeople.*
  2. *Resolved to propose to the Inspector to keep all proposed flood risk sites but remove those at high risk of flooding and move some higher risk sites to later in the Plan period (11-15 years) to allow the River Thames Scheme to be operational and effective, the design code to be completed, and subject to no resolution objection from the Environment Agency.*
  3. *Resolved to propose to the Inspector to withdraw the Staines Development Framework as a core document”.*
- 2.8 It is worth highlighting that ‘Bridge Street car park/Hanover House/Sea Cadet building’ was allocated for housing at submission stage, but on 29 February 2024 E&S Committee agreed to amend that site allocation. The rationale was that whilst unsuitable for housing, it had the potential for “leisure/recreation use to include hotel”. At that stage, it was proposed to amend the allocation to clarify that development would not be permitted in areas of Flood Zone 3b Functional Floodplain (front portion of the site). This part of the site would be retained as floodplain and steps should be taken to restore the land to provide a more natural edge of the River Thames.
- 2.9 The chair of E&S Committee wrote to the Planning Inspector on 3 March 2024 (**Appendix A**). In that letter, the chair advised that a number of steps needed to be taken. Revised Strategic Flood Risks Assessment levels 1 and 2 were completed and submitted to the EA on 20 March. Their initial response was received on 2 May with a further round of updated information sent on 21 June.

## Recent discussions with EA

- 2.10 After a meeting with their officers, some suggested revised policy wording was sent by the Council to the EA (with the prior agreement of the relevant councillors) on 5 June 2024. This sought to deal with their concerns around the reliance on the River Thames Scheme - RTS (the proposed wording is attached at **Appendix B**). These revisions removed any reference to the RTS (wording which had been agreed by the E&S committee in February) and replaced it with wording to:
- ensure a planning application for any future development demonstrates no loss in floodplain storage. The built footprint of the new development will not be permitted to exceed that of the existing building and where possible should be reduced. [Just sites at flood risk]
  - demonstrate safe access and egress (dry or low hazard) to an area outside the floodplain [Sites at flood risk and with access/egress issues]
  - to ensure this safe access is developed in consultation with the Lead Local Flood Authority (Surrey CC) and Emergency Planning teams and input from the Environment Agency is welcomed [Sites at flood risk and with access/egress issues]
  - ensure a site is allocated within the relevant Plan Period to allow opportunity for a plan for safe access and egress (dry or low hazard) to be provided for occupants [Sites at flood risk and with access/egress issues]
- 2.11 The Council received the latest full set of EA comments very late on 21 June 2024. This letter considered the suggested revised wording set out above (**Appendix C**). An addendum letter was received on 1 July 2024 which reiterated the advice of the 21<sup>st</sup> but acknowledged that the Bridge Street site had built form on it (**Appendix D**). These do not represent their final comments as there are a number of issues outstanding. On 21 June the EA advised they currently:
- “consider the plan unsound because it is not justified, effective and consistent with national policy. We have provided you with detailed comments below and have highlighted the comments which require an action from you to address these soundness points.*
- We trust our comments below are useful and we look forward to working with you to deliver a sound local plan that is reflective of national policy and your local evidence base so that it will deliver sustainable development in Spelthorne”.*
- 2.12 It is positive to note the EA continue to work proactively with the Council, and have provided some helpful suggestions on how we can address their concerns. The collective work of the Council, AECOM and the EA means the the issues have been ‘whittled down’ considerably, and there is now far more common ground, which could be built on further depending on the recommendations of this Committee to Council.
- 2.13 There are effectively only two key matters outstanding which require a policy decision, and these need to be made by Council following a recommendation from CPRC committee. The matters at issue are:

1. The EA does not consider the Bridge Street car park/Hanover House/Sea Cadet Building site or the Riverside surface car park site (site refs ST4/002 and ST4/010) can be delivered and are asking for these sites to be removed from the Local Plan.
  2. The EA do not consider that safe access and egress has been provided for 15 sites within the Local Plan and are asking for this to be clearly demonstrated – this number includes the 2 sites referred to above (they have provided some thoughts on matters to be covered to assist).
- 2.13 This is a soundness issue as there is an objection from a statutory consultee. The challenge for Spelthorne is that many of these sites need redevelopment as part of the wider vision for the future of Staines and these considerations should be balanced against the flood risk implications for allocating them in the Plan. It is important to have an established position from the Council on which Main Modifications to site allocations will be sought in order to resume dialogue with the EA, and to put to the Inspector.
- 2.14 There are a number of more technical matters which can be addressed at officer level and do not require a decision by Council or Committee. The planning team will however liaise as usual with the Chair and Vice Chair of E&S Committee to ensure they are comfortable with the response.

### **3 Options analysis and proposal**

#### Site Allocations

- 3.1 The options for Members to consider are:
1. To recommend to Council that two site allocations be removed from the Local Plan on the basis of flood risk and the objection of the EA (Bridge Street car park/Hanover House/Sea Cadet Building and Riverside surface car park (site refs ST4/002 and ST4/010)).
  2. Do not remove the two site allocations.

#### *Option 1 – remove two site allocations (recommended)*

- 3.2 The proposed Main Modifications that were agreed by the E&S Committee on 29 February 2024 to submit to the Inspector would provide up to 8,500 dwellings over the plan period, equating to up to 567 dwellings per annum and 87% of 'Local Plan as submitted' supply.
- 3.3 Removing the Riverside surface car park site would marginally reduce the quantum of new homes that the Local Plan will deliver. It is allocated for 35 units which represents 0.4% of the 8,500 units to be delivered over the lifetime of the plan (if our current proposed Main Modifications are accepted by the Inspector). This will have a very limited impact on the housing trajectory. Combined with the other proposed Main Modifications agreed in February, this would result in us not meeting our housing need in full, but for soundness reasons.
- 3.4 On 29 February 2024, the E&S Committee recommended that the Bridge Street car park/Hanover House/Sea Cadet building site be re-allocated for leisure/hotel use (in light of the EA's concerns). The reduction in housing delivery was accounted for at that stage.



- 3.5 This site is in a brownfield location where development can come forward at any time, regardless of whether or not it has been allocated and/or a Local Plan is in place. Site allocations are more important when they are proposing to release green belt, or deal with new strategic land allocations, for example. The removal of this site allocation would not have a material impact on the Local Plan, aside from the fact that there would be no 'guide' on the types of acceptable uses.
- 3.6 Those reading this report need to be aware that removing this as a site allocation would not mean development cannot take place. Any proposal coming forward would need to be able to demonstrate compliance with the most up to date NPPF, any other national policy, policies in the adopted Spelthorne Local Plan, responses from statutory consultees and any other material considerations. The letters from the EA at **Appendix C and D** are in the public domain so any developer would be clear on the matters to be addressed as part of any planning application.
- 3.7 If the Committee agree to recommend the removal of these sites, it will remove one of two remaining matters which the EA are still objecting to. This will move us towards the position where we can have a more comprehensive statement of common ground with the EA.
- Option 2 – do not remove two site allocations*
- 3.8 As it stands, this is unlikely to result in the Local Plan being found sound (there is an objection from a statutory consultee). The letter from the EA at **Appendix C** sets out more detail around their rationale for the sites to be removed.
- 3.9 Officers have already proposed earlier Main Modifications to remove some of the sites at highest risk out of the Plan. At the E&S Committee on 29 February 2024 four sites were agreed to be removed as housing site allocations on the basis of an objection from the EA (totalling 258 homes). These were Burges Way, Fairways Day Centre, Thames Lodge and Bridge Street car park/Hanover House/Sea Cadet building. That Committee also agreed that other sites would still be pursued (some were moved back to the later years of the Plan) if there was no resolute objection from the EA (these are set out in **Appendix E**).
- 3.10 If this option is pursued it would be for the Inspector to decide whether this would, in conjunction with the other proposed Main Modifications, affect the soundness of the plan.

#### New policy wording

- 3.11 The options for members to consider are:
1. To recommend to Council that it agrees the new policy wording in relation to site allocations at risk from access and egress flooding issues (including dry islands) set out below in line with the suggestion of the EA.
  2. Not agree new policy wording set out below in line with the suggestion of the EA.

The proposed policy wording is set out below:

***The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event. The safe route for access and egress must be provided to allow occupants to safely enter and exit the buildings and be able to reach land outside the flooded area using public rights of way, without the intervention of emergency services or others during design flood conditions, including climate change allowances (i.e. 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance).***

Where relevant

*This site is within a “dry island”, an area of slightly higher ground, less prone to flooding than the land around it. During times of flood, it is possible that the land surrounding this site may become flooded, resulting in this higher area becoming a ‘dry island’. ‘Dry islands’ will be treated the same as the level of flood risk in the area surrounding it, and access and egress (as defined above) is required to be provided.*

*The site will not be available for development until Years 1-5/Years 6-10/Years 11-15 of the Local Plan period to allow time for provision of a safe route for access and egress.*

*Significant infrastructure would need to be in place to reduce the risk and ensure a safe access and egress can be provided and maintained during flood events.*

*Any necessary infrastructure to be provided by the developer must be in place before any built development can commence on the site or in accordance with a timetable to be agreed with the Local Planning Authority, (and secured by a legal agreement to ensure the infrastructure to be provided on the site and be part of the allocation for its lifetime).<sup>1</sup>*

- 3.12 The sites to which this new policy wording refers to are set out in **Appendix E**. Members should note that if the two site allocations referred to in para 3.1 are removed then there will be 13 sites which this new policy wording would apply to.
- 3.13 Members of this Committee need to be aware that the suggested revised policy aligns with the policy ‘E3: managing flood risk’ as set out the submitted version of the Local Plan. It does not conflict with any minor amendments that the EA have requested as part of their on-going consultations.

*Option 1 – agree new policy wording (recommended)*

- 3.14 The new policy wording will hopefully address the concerns of the EA (since it is based on their own parameters). The aim is to ensure that matters of safe access and egress are dealt with robustly. This will protect the safety of future residents in the event of a flood, which the Administration have said is a very high priority in relation to the Local Plan. We are currently liaising with the EA

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<sup>1</sup> Each site allocated in the Plan will need to demonstrate that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% AEP plus an allowance for climate change flood event

<sup>1</sup> As set out in table X

<sup>1</sup> up to and including the 1% AEP plus an allowance for climate change flood event.

on the new policy wording, and will update members verbally at the committee on any feedback we receive prior to the meeting.

- 3.15 The overarching thrust of the new policy wording is to make it clear that sites will not be available until safe access and egress can be assured, which goes to the heart of the concerns of the EA. It is designed to ensure that sites come forward at the appropriate point in time. However, if development comes outside that timeframe a developer would need to ensure significant infrastructure is in place prior to any development being undertaken.
- 3.16 The first part of the new policy wording only allows sites to come forward in a defined Local Plan period/time frame will give certainty around delivery. Developers will be clear on when a scheme could come forwards (though there may still be instances where an application comes forward 'early' and the policy is tested at appeal if the Council is consistently under-delivering on its housing targets). It also gives certainty around the trajectory of housing delivery over the lifetime of the Plan.
- 3.17 The other parts of the new policy wording will place a significant responsibility on developers to bring forward necessary infrastructure before any building comes forward. In some cases, off site works may be the only solution (which would require separate consents). Depending on the extent of infrastructure required, developers will need to build those capital costs into their schemes. The advantage of having such an explicit upfront policy in the Local Plan ensures that developers are aware of the requirement before they purchase any land, and will be able to factor these into their costings.
- 3.18 In deciding whether to agree this option, consideration needs to be given to potential impact of this revised policy wording on housing delivery. The NPPF at Para. 69 states that planning policies should identify a supply of specific, deliverable sites for 5 years following the intended date of adoption (2025 – 2030). For the later period, it states we should identify a supply of specific, developable sites or broad locations for growth, for the subsequent years 6-10 (2030 -2035) and, where possible, for years 11-15 (2035 – 2040) of the remaining plan period.
- 3.19 Spelthorne does not currently have a five-year supply of housing land, so past under-delivery places additional burden on the earlier part of the Plan. Adopted Local Plans are required to be reviewed every five years, which allows for that important first phase of delivery to be assessed to ensure an adequate number of homes continue to be planned for. This could be an area of concern for the Inspector if the trajectory for housing delivery does not meet the requirements of Para. 69 even if overall the sites are left in the Plan but moved to later periods.
- 3.20 If the Committee agree to recommend the new policy wording, it will remove one of two remaining matters which the EA are still objecting to. This will move us towards the position where we can have a more comprehensive statement of common ground with the EA.
- Option 2 – do not agree new policy wording.*
- 3.21 As it stands, this is unlikely to result in the Local Plan being found sound (there is an objection from a statutory consultee). Whilst not explicitly objecting, the EA are clearly signalling the need for a more policy wording to give a clear demonstration that a safe access and egress has been provided.

- 3.22 If the Committee were to decide to continue to rely on the position agreed by E&S Committee on 29 February 2024, it would be for the Inspector to decide whether this would, in conjunction with the other modifications, affect the soundness of the Plan.
- 3.23 If the Inspector is willing to consider proceeding with the Examination on the basis of these modifications in order to explore this matter further, a Statement of Common Ground would need to be signed with the EA to set out which areas of their objection remain ('uncommon ground') and remain to be resolved through the hearings with reference to the wider planning and regeneration reasons for the Council's approach to keep the lower risk sites in the Plan with the necessary interventions.

#### **4 Financial management comments**

- 4.1.1 The financial implications were set out in the report to Council on 14 September 2023, which included further costs for resuming the Examination. Those costs were expressed as a minimum as they are dependent on the extent of modification Members agree to pursue. If the proposed modifications agreed require further justification and evidence this will incur additional cost beyond those anticipated if the hearings resume on the basis of the Local Plan as submitted. This is also dependant on the Inspector's expectations for what he requires in order to recommence the Examination, given the passage of time since the first hearings and any external factors that may need addressing or evidence that would have required updating even if the Local Plan remains as submitted.
- 4.1.2 In the event that the initial modifications proposed to the Inspector post 29 February, plus these further modifications (if agreed), cannot be considered as part of the Examination (and we are unable to withdraw it), further deliberations will be required by the Council on whether a further set of revised changes may be more acceptable. This additional time could result in further costs for additional evidence and justification to be prepared.
- 4.1.3 Once the Council has made its decision, and with any guidance the Inspector is able to provide, we will be able to estimate with greater certainty what these costs might be in order to resume the Examination.

#### **5 Risk management comments**

- 5.1.1 As well as the financial risks identified above, there is the risk of further intervention by the new Minister for Housing and Planning. The initial letter with the Directive stated:
- Should a significant delay occur to progressing the examination, and should you fail to comply with the directions in this letter, I will consider taking further intervention action to ensure that an up-to-date local plan is in place.*
- 5.1.2 Spelthorne has been making positive progress to resume the Local Plan Examination. If the initial set and this second set of proposed Main Modifications are rejected by the Inspector, there is the risk that a continued review of changes results in further delays. This could lead the Minister considering whether or not to trigger further intervention. The ultimate

legislative backstop could be that the Plan is taken over by another body and progressed to adoption. This has not happened anywhere in the country to date.

- 5.1.3 Senior officials at DLUHC are being regularly updated on our progress to help mitigate this risk of further intervention.
- 5.1.4 In order to ensure the right quality of development comes forward in Staines, work is ongoing on a Spelthorne Design Code. Members who sit on the E&S Committee will be familiar with this work, having agreed its progression back in January of this year. A dedicated webpage has been set up (linked from the home page of the Council website) to keep the public and communities updated on progress. [Have Your Say Today - Spelthorne Design Code - Commonplace](#)

## **6 Procurement comments**

- 6.1.1 Any of the options chosen that result in proposing modifications may require further evidence and justification, which may result in the need to commission consultants to update work they have already produced for us to support the Local Plan or new pieces of work entirely. This would be discussed with the Procurement Team as required.

## **7 Legal comments**

- 7.1.1 An option to withdraw the Local Plan from Examination is not available to the Council under the Minister's Directive (September 2023).
- 7.1.2 Any changes to site allocations would normally be for the E&S Committee as it is within their terms of reference. Full Council on the 18th July will consider the recommendations from this Committee as the Council may at any time resume responsibility for a function and exercise that function despite any delegation, which in this case would be within the remit of the Environment and Sustainability Committee.
- 7.1.3 This avoids the necessity of calling an Extraordinary E&S Committee meeting.

## **8 Other considerations**

- 8.1 See previous reports from [6 June 2023](#) and [14 September 2023](#).
- 8.2 The results of the general election on 4 July 2024 may or may not result in a change of government. Regardless of the political complexion, local plans are a high priority, and will still need to be progressed at their current pace or even faster.
- 8.3 Any new guidance that does emerge will take some months to come out, and is considerably less likely to cover our current situation (e.g. at Examination), than would be the case if we had an adopted plan or were at the early stages of developing a new plan.
- 8.4 Members need to be aware that the EA is a statutory consultee and their objection means there is a soundness issue unless it can be resolved. The Local Plan is a document that has to achieve its stated aims at the same time as balancing the competing views of individual stakeholders. Whilst the Council had agreed a view on these matters in submitting what in its views is a sound plan for Examination, it will ultimately be for the Planning Inspector to test this through that process.

- 8.5 A number of flood risk sites are owned by the Council. Other than the fact that delivery of development of these sites being within the control of this authority, the ownership of land is not relevant to the Local Plan. Resulting impacts of decisions on modifications from a landowner perspective, such as the financial implications, are not for consideration in this report.
- 8.6 Members will be aware of the recent work undertaken by Dr Paul from Holloway University on groundwater issues in Staines-upon-Thames. This is an independent study (not commissioned or paid for by the Council) which has not been peer reviewed or finally published. It will be for Dr Paul and the University to decide whether to submit this study to the Planning Inspector for his consideration.
- 8.7 It does not prevent this committee from making recommendations to Council on matters around the EA letter which relates to fluvial flooding.

## **9 Equality and Diversity**

- 9.1 These matters have been addressed throughout the development of the Local Plan, including the production of an Equalities Impact Assessment that was submitted with the Local Plan.

## **10 Sustainability/Climate Change Implications**

- 10.1.1 Sustainability appraisal, including climate change implications, is the cornerstone of plan making and has been included throughout the Plan's preparation to respond positively to the Climate Change Emergency. Depending on which options are ultimately taken forward, further sustainability appraisal may be required.

## **11 Timetable for implementation**

- 11.1.1 This Committee is asked to make a recommendation to Council on the site allocations and proposed tightened policy wording. Depending on the decision, the Council will then write formally to the Inspector to set out the proposed modifications (if any) and await his advice on whether or not the Examination hearings can resume. The timetable thereafter will be for the Inspector to set out.

## **12 Contact**

- 12.1 Heather Morgan, Group Head Place, Protection and Prosperity  
[h.morgan@spelthorne.gov.uk](mailto:h.morgan@spelthorne.gov.uk)  
Jane Robinson, Interim Joint Strategic Planning Manager  
[j.robinson@spelthorne.gov.uk](mailto:j.robinson@spelthorne.gov.uk)

**Background papers: There are none.**

**Appendices:**

**Appendix A: Chair of E&S committee letter to Planning Inspector March 2024**

**Appendix B: SBC suggested wording to EA 5 June 2024**

**Appendix C: EA letter 21 June 2024**

**Appendix D: EA letter of 1 July 2024**

**Appendix E: Sites to which proposed new policy wording would apply**

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Mr J. Bridgwater  
 Planning Inspector  
 (by email)

Please reply to:

Contact: Daniel Mouawad  
 Chief Executive

Direct line: 01784 446350

Email: DCM.CEX@spelthorne.gov.uk

Our ref:

Date: 6 March 2024

Dear Mr Bridgwater

### **Spelthorne Local Plan Examination**

I write to advise you of the current progress we are making in order to resume the Examination in Public for Spelthorne's new Local Plan.

You have kindly provided us with two pauses to the examination hearings, which have allowed for our newer Members to understand more about the Local Plan, for a Critical Friend review and latterly to await the publication of the revised National Planning Policy Framework.

I understand you were provided with a copy of the report, via the Programme Officer, to the Environment & Sustainability Committee meeting that took place on Thursday 29 February. That report set out options for considering modification to the Local Plan before the examination resumes, covering the themes of Green Belt allocations, flood risk sites and the Staines Development Framework. The Committee decided on the options for these themes as follows:

- Remove all Green Belt allocations from the Local Plan with the exception of the two allocations that meet the need for Gypsy, Traveller and Travelling Showpeople
- Keep all proposed flood risk sites but remove those at high risk of flooding and move some high-risk sites to later in the Plan period (11-15 years) to allow for the River Thames Scheme to be operational and effective, the design code to be completed and subject to no resolute objection from the Environment Agency
- Withdraw the Staines Development Framework as a core document

Spelthorne Council fully recognises that modification of the Local Plan at this stage rests with yourself as Inspector and that we are simply requesting that you give consideration to the changes set out above, and in light of the justification within the committee report. We would be happy to provide you with any further information or evidence to enable you to decide whether these proposals can be accepted and discussed further through the hearing sessions once the examination resumes.

In respect of the flood risk sites, we were awaiting a decision of the Council on which sites we wished to see retained in the Local Plan, with appropriate mitigation and intervention, plus an updated Strategic Flood Risk Assessment from our consultants, AECOM, and further engagement with the Environment Agency. Now that we have the resolution last week from the Committee, I can advise you of the next steps we are undertaking before you have the necessary information to consider resuming the hearings (please note that the dates are estimates when outside of the Council's control):

<b>Action</b>	<b>Timescale</b>	<b>Date</b>
Revised SFRA Level 1 and 2 delivered by AECOM		Friday 22 March
Comments back from EA (Subject to the Thames not flooding)	6 weeks	Friday 3 May
AECOM to make any amendments or corrections (Estimate, dependent on comments received from the EA)	2 weeks	Friday 17 May
Final comments from EA	2 weeks or 21 days	Friday 31 May or Friday 7 June
Write to Inspector with final EA comments		w/c 3 June or w/c 10 June

We wish to offer our continued assurance that Spelthorne wishes to have a Local Plan in place at the earliest opportunity and that we are taking the necessary steps in order to progress the Plan back to examination.

Yours sincerely



Councillor Malcolm Beecher  
Chair of Environment & Sustainability Committee

## INFORMATION SUBMITTED TO ENVIRONMENT AGENCY 5 JUNE 2024

**Examples of possible wording to be added to site allocations within the Spelthorne Local Plan**

At E&S Committee on 29 February 2024, the Committee resolved that option 3 be amended to read:

*“Keep all proposed flood risk sites but remove those at high risk of flooding and move some high risk sites to later in the Plan period (11-15 years) to allow for the River Thames Scheme to be operational and effective and the design code to be completed and subject to no resolute objection from the Environment Agency.”*

Following comment from the EA regarding reliance on the River Thames Scheme and continuing concerns regarding access and egress, the text below provides examples of possible wording to be added to site allocations within the Spelthorne Local Plan for sites where issues have been noted in the SFRA documents. Comment on these is invited.

**Example: Site at flood risk and access & egress issues identified**

The Spelthorne SFRA Level 2 document (May 2024) identified *“The site and access routes are at Moderate<sup>1</sup> to Significant hazard<sup>2</sup> rating during the 1% AEP event including climate change”*. This is *“Danger to some - includes children, elderly and infirm”* to *“Danger for most people – includes the general public”*. Before planning permission can be granted on this site for residential use (or other More Vulnerable uses<sup>3</sup>), it will be required to be demonstrated that safe access and egress (dry or low hazard) is provided for occupants, to an area outside the floodplain during the design flood event (1% AEP), including an allowance for climate change.

The development of a plan for safe access and egress (dry or low hazard) may be developed for this site in isolation or in conjunction with other sites within Staines town centre. The plan for safe access (dry or low hazard) will be developed in consultation with the Lead Local Flood Authority (Surrey CC) and Emergency Planning teams and input from the Environment Agency is welcomed.

A planning application for any future development on the site must demonstrate no loss in floodplain storage during the 1% AEP event including climate change event. The built footprint of the new development will not be permitted to exceed that of the existing building and where possible should be reduced.

The site is allocated within Years XXX of the Plan Period to allow opportunity for a plan for safe access and egress (dry or low hazard) to be provided for occupants.

**Example: Site has access & egress issues identified**

The Spelthorne SFRA Level 2 document (May 2024) identified *“The site is not shown to be at risk of flooding the design event (1% AEP event including climate change), however access routes to the site are at Moderate hazard rating”*. Moderate hazard is defined as *“Danger to some - includes children, elderly and infirm”*. Before planning permission can be granted on this site for residential use (or other More Vulnerable uses<sup>4</sup>), it will be required to be demonstrated that safe access and egress (dry or low hazard) is provided for occupants, to an area outside the floodplain during the design flood event (1% AEP), including an allowance for climate change.

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<sup>1</sup> Moderate Flood Hazard: Dangerous for some (i.e. children) – Danger: flood zone with deep or fast flowing water

<sup>2</sup> Significant Flood Hazard: Dangerous for most people – Danger: flood zone with deep fast flowing water

<sup>3</sup> As defined in NPPF annex 3

<sup>4</sup> As defined in NPPF annex 3

The development of a plan for safe access and egress (dry or Low hazard) may be developed for this site in isolation or in conjunction with other sites within Staines town centre. The plan for safe access and egress (dry or low hazard) will be developed in consultation with the Lead Local Flood Authority (Surrey CC) and Emergency Planning teams and input from the Environment Agency is welcomed.

The site is allocated within Years XXX of the Plan Period to allow opportunity for a plan for safe access and egress (dry or low hazard) to be provided for occupants. If a safe access and egress can not be demonstrated within this period, planning permission will not be granted.

creating a better place



Jane Robinson  
Local Plans Manager  
Spelthorne Borough Council  
Knowle Green,  
Staines  
TW18 1XB

Date 21 June 2022

Dear Jane

**Spelthorne Borough Council, Local Plan review- Strategic Flood Risk Assessment (SFRA) Level 1 and 2**

We have reviewed the SFRA Level 1 and 2, Word document from Aecom (*EA comments SBC doc*) and *Examples of possible wording to be added to site allocations within the Spelthorne Local Plan*).

We would like to thank you for addressing many of our comments and concerns, however, we still have concerns about how some of the sites listed in the Level 2 SFRA and then the draft local plan will be delivered. Our main concerns are in relation to *deliverability and safety of sites in the local plan*. In particular;

- We do not consider that sites ST4/002 and ST4/010 which are located within the Flood zone 3b (defined in the Flood risk section of the PPG as Functional floodplain) and 3a (and Land having a 1% or greater annual probability of river flooding) respectively can be delivered. We therefore ask that these sites are removed from this local plan and
- We currently do not consider that safe access and egress in the event of a flood has been provided for 15 sites within the local plan. This will need to be clearly demonstrated.

We therefore consider the plan unsound because it is not justified, effective and consistent with national policy. We have provided you with detailed comments below and have highlighted the comments which require an action from you to address these soundness points.

We trust our comments below are useful and we look forward to working with you to deliver a sound local plan that is reflective of national policy and your local evidence base so that it will deliver sustainable development in Spelthorne.

If you have any question, please contact me.

Yours sincerely

Judith Montford  
Planning Specialist

Direct dial 0208 026 3064  
E-mail [Planning\\_THM@environment-agency.gov.uk](mailto:Planning_THM@environment-agency.gov.uk)

## LEVEL 1 SFRA

### Appendix 1

**ACTION** Consultation dates should be updated in paragraph 4 of the 'Executive Summary' and in section 1.1.3, from *“May 2023 and January 2024”* to May 2023 and June 2024

**ACTION** Section 1.2.8 states; *“Where the Sequential and Exception Tests have been applied as necessary and not met, development should not be allowed”*. Please explain **how this approach has been applied now for the allocated sites in the local plan (listed in the Level 2 SFRA)?**

### Living Document

We acknowledge the date under 1.6.3 now states 2025 and section 1.6.4 has now been removed relating to RTS. **No further comments.**

### 3.2 Flooding from Rivers

- 3.2.5, 3.2.6 and 3.2.7 The full name of the Thames model (Thames (Datchet to Teddington) 2023) has been included in Table 3.2 – **No further comments**
- Figure 3.1 has been amended to state Hydraulic models for the River Thames to use across Spelthorne to inform SFRA – **No further comments**
- Section 3.2.8 and Figure 3.2 has been updated to state Thames (Hurley to Teddington) 2019 – **No further comments**

### Flood Zone 3b Functional Floodplain

- In section 3.2.12 it now has been updated to state *“If the 1 in 30 year (3.3% AEP) event becomes available as part of an updated model for the River Colne, this should be used to define Flood Zone 3b”*. **No further comments**

### Climate Change

- We previously advised that a section should be added to explain that in some locations the dominant source of flooding will be from a neighbouring management catchment and this is in section 3.2.16. **No further comments.**
- Section 3.2.30 now makes reference to January 2024 floods. **No further comments**
- **ACTION** Section 3.2.35 refers to PPG 42 in regard to residual risk; *“In accordance with the PPG (paragraph 042) residual flood risk needs to be assessed by developers so the risk to developments can be safely managed, including designing developments located behind flood defences to avoid internal flooding from residual risk from flood risk management infrastructure wherever possible and ensuring people are not exposed to hazardous flooding, irrespective of the development’s vulnerability classification.”*  
However, we feel PPG 42 has not been interpreted accurately. PPG Paragraph 42 advises that residual risk should be minimised at each stage of the plan making process where flood risk is a consideration. According to the hierarchy outlined in Paragraph 004 of the PPG, avoidance measures should still be considered in the first instance.  
Can Spelthorne Borough Council (SBC) clarify what they mean in section 3.2.35.

### Flood Risk Management Strategies

- We note that the temporary defences section (Previously sections 3.2.52-3.2.55 in relation to Temporary Defences for Staines Upon Thames, Littleton Lakes and Shepperton Mead Farm) has now been removed. **No further comments**
- RTS sections has now been updated based on our comments (sections 3.2.44 to 3.2.50). **No further comments**

### Section 3.3 Flooding from Surface Water

- Footnote 24 link has been amended. **No further comments**

### Section 3.7 Assessing the cumulative impact of development.

- Section 3.7.3 has now incorporated Paragraph 049 of the PPG. **No further comments.**

### 4.2 Applying the Sequential Test for the Local Plan

- **ACTION** We previously asked *“We would ask for more information on how Spelthorne applied the sequential test. It is not clear if the Sequential Test has been updated. Therefore, explanation/evidence of the methodology of how exactly Spelthorne Borough Council have carried out the Sequential Test as well as the Sequential Test updated should be provided”*

In EA Comments SBC document (within email dated 07 June 2024), it mentions that an updated ST to be provided. We have not seen this document supplied as of 21 June 2024.

#### **4.3 Applying the sequential test for planning applications.**

- In section 4.3.5 the footnote of the NPPF has been amended from 56 to 60. **No further comments.**
- Details on minor development and paragraph 51 has now been included in section 4.3.6. Footnote 31 was added to define minor development. **No further comments.**

#### **5.3 Safeguard land for flood risk management**

- Section 5.3.4 has removed the reference to FRAP. **No further comments.**
- Section 5.3.9 has now been amended to state "In developed areas within the 3.3% AEP flood extent (or equivalent, for example 2% AEP for the River Colne), where it can be demonstrated that existing infrastructure or solid buildings that resist water ingress are not providing a flood storage function, these are not included within the definition of Flood Zone 3b Functional Floodplain and the associated planning requirements do not apply." **No further comments.**

#### **5.4 Sustainable drainage systems**

- No further comment to section 5.4.2 which was updated previously. **Please note it is for the LLFA to provide comment on section 5.4**

#### **5.9 Finished Floor Levels**

- **ACTION** Section 5.9 about finished floor levels. We are pleased to note that Spelthorne Borough Council have removed the misleading table 5.3 and made the FFLs requirements simpler. However, section 5.9.4 - state that "*There are also circumstances where flood resilience measures should be considered first.*" and list the examples given in Paragraph 069 of the PPG. This is incorrect - avoidance measures should still be considered first, as per the hierarchy outlined in Paragraph 004 of the PPG, and resistance and resilience measures should only be considered once other options have been proven inappropriate/impractical. The bullet point examples from Paragraph 069 of the PPG are situations where it may be acceptable for a development to rely only on resistance and resilience measures, but it must still be demonstrated that avoidance measures are not viable. SBC should rectify and amend this section.

#### **6.2 Access and Escape**

Paragraph 6.2.9 is not suitable now because of their plans to deliver sites which we think are problematic. We didn't provide comments previously but since we are now aware that SBC want to deliver those sites and as we have stated that they cannot rely on the RTS we have reviewed and provided comments regarding access and egress.

#### **7.0 Preparing Site Specific FRAs**

- Email address has been corrected in section 7.3.5. **No further comments.**
- Section 7.3.6 has been updated to now state "*Where a proposed development site is in close proximity to a watercourse (Main River or Ordinary Watercourse) and either no modelling exists, or the available modelling is considered to provide very conservative estimates of flood extents (due to the use of national generalised JFLOW modelling), applicants may need to prepare a simple hydraulic model to enable more accurate assessment of the probability of flooding associated with the watercourse and to inform the site-specific FRA*". **Please beware of future updates and refer to [Updates to national flood and coastal erosion risk information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/updates-to-national-flood-and-coastal-erosion-risk-information) for more information.**

#### **Appendix**

- Figures 4, 5 and 6 now include model names as requested. **No further comments.**
- Appendix B flood mapping now includes the 0.1% scenario for the Thames and Ash model. **No further comments.**

## Level 2 SFRA

### Section 1.3 Level 2 SFRA

- In section 1.3.4 there has been no amendments to the sentence but have stated report has been updated to reflect email (17/05/2024) **No further comments.**

### Exception Test

- **No further comment** to Table 1.1

### Section 1.6 Future Updates to the SFRA

- **ACTION** In regard to point 1.6.5, as the project is ongoing we suggest the following is used instead: *"From December 2023, the Environment Agency have paused all updates to the Flood Zones on Flood Map for Planning. The last quarterly update was published in November 2023. Please see [Updates to national flood and coastal erosion risk information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Updates_to_national_flood_and_coastal_erosion_risk_information_-_GOV.UK.pdf) for information why this pause has occurred and on when the next update is expected. It is expected that once updates resume the Flood Map for Planning will be updated quarterly. The Flood Map for Planning (Rivers and Sea) available online should be consulted for the most up to date Flood Zones 2 and 3".*
- The sentence in section 1.6.7 *"implementation of the River Thames Scheme (RTS) would result in a reduction in modelled flood levels in Spelthorne, which will need be reflected in future versions of the SFRA"* has now been removed. **No further comments.**

### Section 2.0 Datasets

- AECOM confirmed that the May 2024 included trimmed results that was supplied to Spelthorne. **No further comments**
- Section 2.2.2 has now been updated to read; *"in some locations the dominant source of flooding will be from a neighbouring management catchment. If so, use the allowances from the neighbouring management catchment to assess the risk for your development or site allocation".* **No further comments**

### Section 2.4 Groundwater Flooding

- AECOM has now included a sentence explaining the need for a HRA in section 2.4.10. **No further comments**

### Section 2.7 RTS

- AECOM has now removed section 2.7.2 and 2.7.3 regarding the RTS with just the general reference to the scheme and link provided. **No further comments**

### Section 2.8 Cumulative impact of development

- **ACTION:** In section 2.8.4 a sentence has now been added *"As a number of sites are being identified for potential redevelopment in Staines town centre, a wider plan for access to and from the town should be implemented. This will need to be developed in consultation with Emergency Planning to ensure the safety of occupants, and not place an unacceptable additional burden on the emergency services. Such an access route will also be available for existing properties within the Staines area and will therefore improve the flood risk management measures for the area."* It is unclear what this is referring to. Please can SBC clarify what this will entail.

### Section 3.2 Site Assessments

- In Table 3.2 a column has been included in table confirming local plan period. **No further comments**
- In section 3.3.9 (formerly 3.2.8) has now corrected site reference for the Vodafone site (ST4/028) **No further comments**
- In this SFRA, section 3.3.1 it has been confirmed that 3 sites will be removed – ST1/029, ST1/030 and ST4/011. **No further comments relating to these 3 sites**
- In the SFRA there is no longer mention of the Staines Development Framework (SDF) but there is some additional wording provided in 2.8.4. **No further comments**
- In the SFRA there is no longer mention of the use of voids previously within section 3.2.6. **No further comments**



### Site Allocations:

The key areas of concern (and these are the key soundness points) relating to the allocated sites for some of the allocations are Functional floodplain – in relation to ST4/002 and ST2/010 and Safe access and egress.

### **Access and Egress relating to the listed site allocations**

To explain our role in regard to access and egress provision, please note that the Environment Agency provides advice on access and egress at the plan making stage due to its duties to strategically overview flood risk safety matters. Where we do not consider that access and egress has been demonstrated, we are able to raise soundness concerns in regard to flood risk planning and safety. However, in regard to reviewing access and egress in detail and at a site-specific level it is the responsibility of the Local Planning Authority to ensure that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% AEP plus an allowance for climate change flood event.

At the planning application stage, we always advise refer the LPA and applicants to paragraph 163 of the National Planning Policy Framework (NPPF), which requires the applicant to ensure that safe access and escape routes are included. We further advise that within the application documents the applicant should clearly demonstrate to the LPA that a satisfactory route of safe access and egress is achievable. It is for the LPA to assess and determine if this is acceptable.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise the LPA to formally consider the emergency planning and rescue implications of new development in making decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the PPG.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

In relation to the local plan and evidence base, there are several sites that cannot demonstrate safe access and egress routes as listed below. Evidence should be provided in the SFRA that Emergency Planners have been consulted and agree with the sites to be allocated as safe. At present, many sites in Table 3-2 say that Emergency Planners 'will be consulted', and section 2.8.4 states that a wider plan for access and egress 'will be developed' with Emergency Planners. An acceptable plan however should be developed and detailed in the SFRA before these site allocations can be considered for inclusion in the Local Plan.

We have provided further details below explaining why we do not consider that access and egress has been provided to deliver the below listed sites.

In section 2.8.4 of the Level 2 SFRA and within the Appendix B (for some sites) it states that *"As a number of sites are being identified for potential redevelopment in Staines town centre, a wider plan for access to and from the town will need to be implemented to allow delivery of the sites. This will be developed in close consultation with Emergency Planning to ensure the safety of occupants before permission is granted"*. It is unclear what this will referring to (as previously mentioned earlier in this document) so could SBC clarify this?

As we stated previously, there should be no reliance on the RTS (we have further explained the reason why below) and we understand there would be no infrastructure improvements. Therefore, the question is how will SBC deliver these sites? For example, would the improvements be carried out by developers? If so when will this infrastructure be delivered and will it be delivered in time for when the site is proposed to be delivered in the local plan?

The sites identified in the Level 2 SFRA (also listed below) with no access that is dry or low hazard are summarised in Table 3.2, with them ranging from moderate to significant hazard (defined a **"Danger for some - includes children, elderly and infirm" to "Danger for most people – includes the general public"**). There appears to be some issue with the hazard information when compared to our modelling:

1. Shepperton Youth Centre (SH1/015) – Hazard varies but includes Danger for Most
2. Shepperton Library (SH1/010) – Dry Island – Access includes Danger for Most
3. Shepperton Delivery Office (SH2/003) – Dry Island – Access includes Danger for Most
4. Leacroft Centre (ST1/028) – Hazard varies but includes Danger for Most

5. Thameside House (ST1/037) – Small section of site (nearest river) includes Danger for Most and Access includes Danger for Most
6. Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street (ST4/002)- Danger for Most
7. 96-104, Church Street (ST4/004)- Hazard varies but includes Danger for Most
8. The Elmsleigh Centre and adjoining land, South Street (ST4/009) – Danger for most
9. Riverside Surface, Carpark, Thames Street (ST4/010) - Danger for Most
10. Debenhams site, 35-45, High Street (ST4/019)– Access Danger for Most
11. Two Rivers Retail Park Terrace, Mustard Mill Road (ST4/023) – Access Danger for Most
12. Frankie & Benny's/Travelodge, Two Rivers (ST4/024) – Access Danger for Most
13. Land at Coppermill Road, Coppermill Road (ST4/025)
14. Communications House (ST4/026) – Access Danger for Most
15. William Hill / Vodafone, Monsoon (ST4/028) – Access Danger for Most

Within the table 3.2 (as well as section 3.3.6 of the Level 2 SFRA) there are sites highlighted in orange and red (where relevant) it states *“Before planning permission can be granted on this site for residential use (or other use at similar vulnerability), it will be required to be demonstrated that safe access and egress (dry or Low hazard) is provided for occupants, to an area outside the floodplain during the design flood event (1% AEP), including an allowance for climate change.”* It is unclear in the wording how this will be possible unless it is because it is assumed the 1) RTS is built and 2) that the scheme will result in low hazard or 3) some other form of infrastructure is in place.

As highlighted previously, Spelthorne should not be relying on the River Thames Scheme to deliver their allocated sites and we cannot endorse the SFRA if it includes this reliance on the River Thames Scheme for future delivery of allocated sites. Spelthorne need to be aware that flood defence schemes do not fully remove the risk of flooding and a residual risk will always remain. What if the RTS cannot deliver a low hazard, can these sites still be delivered safely?

In section 3.3.7 of the Level 2 SFRA it states *“The development of a plan for safe access and egress (dry or Low hazard) may be developed for sites in isolation or in conjunction with other sites within the Staines or Shepperton town centres. The plan for safe access and egress (dry or Low hazard) will be developed in consultation with the Lead Local Flood Authority (Surrey CC) and Emergency Planning teams and input from the Environment Agency is welcomed.”* It is unclear in this sentence what this will entail? Has the conversations happened with Emergency Planners and SCC for these sites since our previous comments?

It must also be noted that there are some sites, in the SFRA Level 2 Appendix B there are some sites that have been identified as not having low hazard, but access and egress is considered low. There appears to be some issue with the hazard information on the maps when compared to our modelling:

1. Staines Telephone Exchange (ST3/012) – “Site is at Low and Moderate hazard from the River Thames during the design event. Access that is dry or at low hazard rating during the 1% AEP event including climate change allowance is achievable along Fairfield Avenue and onto London Road”. **We note that some of the site and access, fall within danger for most**
2. Ashford Community Centre (AT1/012) – “Site at Moderate hazard, northern edge adjacent to River Ash at Significant hazard. Access at Low hazard during the 1% AEP event including climate change is achievable south along Woodthorpe Road”.
3. Thameside Arts Centre (ST1/031) – “Site is at Low and Moderate hazard. Access that is at low hazard during the 1% AEP event including 35% climate change allowance is achievable via Wyatt Road or Edgell Road, onto Budebury Road and then Gresham Road onto Kingston Road”. **We note that some of the site and access, is danger for most.**

**ACTION** In summary **SBC would need to clearly demonstrate to the Inspector that they can actually deliver these sites listed above by ensuring that there would be a safe route of access and egress can be provided and maintained during flood events up to and including the 1% AEP plus an allowance for climate change flood event.**

We currently do not consider that access and egress has been provided for these sites. It is important for SBC to refer to PPG paragraph 044 and 047 and standard guidance FD2321/TR11 (Flood Risk to People Methodology) and FD2320/TR22 (Framework and Guidance for Accessing and Managing Flood Risk for New Development) on how access and egress can be delivered.

**ACTION** The information about access and egress in the Table 3.2 of the Level 2 report has not been included/reflected in the Appendix B of the Level 2 report. For instance, for Leacroft Centre it is states in Appendix B "*The modelling for the River Thames indicates there is currently no dry or low hazard access route available during the 1% AEP including 35% climate change allowance*". However, in the Table 3.2 it says "The site is at Low to Moderate hazard, and access routes are at Moderate - Significant hazard rating during 1% AEP event including climate change".

### **Sites to be removed from the local plan**

Table 3.2 highlights two sites (ST4/002 and ST4/010) as having "*significant flood risk constraints identified. Unlikely to be able to be managed to ensure development is safe for its lifetime without increasing flood risk elsewhere*". There remains uncertainty to how these particular sites can be delivered and we have provided an explanation below. We ask that these sites - ST4/002 and ST4/010 are removed from the local plan.

#### **1) Site ST4/002 Bridge Street Car Park**

- There has been no explanation provided in the SFRA Level 2 to explain how this site can be delivered especially as the SFRA concludes in section 3.3.4; "*...is unlikely to be considered acceptable for More Vulnerable development*". The amended proposal is for leisure/recreational use to include a hotel. The proposed site is said to be delivered in Years 1-5 of the Local Plan.
- Part of the site lies within the 3.3% modelled extent (which is the definition of functional floodplain in the Level 1 SFRA). The site is located within the (defended) 5%, 3.3%, 1%, climate change scenarios and 0.1% modelled extent.
- The proposal will be increasing the vulnerability (In NPPF Annex 3 Car Parks are considered Less Vulnerable and Hotels are considered More Vulnerable) and as a result increasing occupants. The proposed development/site use is not suitable at this site which is in a functional floodplain. As more vulnerable is being proposed (from a carpark to a leisure/recreational use including a hotel with 158 units) this is considered not appropriate according to Table 2 of the flood risks section of the PPG. This site should be limited to water-compatible development only if it is being considered as an allocation.
- In Spelthorne's SFRA Level 2 Appendix for Bridge Street Car Park it states "Modelling outputs for the River Thames for the 1% AEP event including a 35% increase in peak river flows as a result of climate change, **indicates flood depths on the site of 0-1.5m**. The hazard rating is Moderate to Significant, meaning 'Danger for Most'".
- It states in the SFRA and site-specific recommendations (Appendix B) "*The built footprint of the new development should not exceed that of the existing building and where possible should be reduced*". The site is currently a car park and therefore does not have a 'built footprint' in relation to flood risk impacts.
- Section 3.3.2 of the Level 2 SFRA states "*it will not be possible to provide level-for-level and volume-for-volume floodplain compensation storage within the development sites for any increase in building footprint*". Therefore, how will the floodplain compensation be provided for the loss of floodplain storage up to the 1 in 100 plus appropriate allowance for CC.
- In section 3.3.4 it states "*In order for future development not to impact on the ability of the floodplain to store water, this would require buildings to be floodable or raised with floodplain storage beneath*", however as stated in PPG 49 and in section 5.6.7 of the SFRA Level 1, voids and stilts should not be used for providing compensation for any loss of flood plain storage and we would have concerns making a building floodable. Advice in NPPF (paragraphs 165 and 170b) requires development to be safe for its lifetime
- In the site-specific recommendations in Appendix B it states "*The modelling for the River Thames indicates there is currently no dry or low hazard access route available during the 1% AEP including 35% climate change allowance. In order to cross the railway line and leave the floodplain, parts of the route along the A308 are defined as Significant hazard ('Danger for Most')*".
- Potential for Ground Water and risk of surface water flooding, and lies within historic flooding outlines

#### **2) Site ST4/010 Riverside Car Park**

- There has been no explanation provided in the SFRA Level 2 to explain how this can be delivered especially as the SFRA concludes in section 3.3.3 that "*...is unlikely to be considered acceptable for More Vulnerable development*". The proposed site is for residential and is said to be delivered in Years 11-15 of the Local Plan.
- The site is located within (defended) 1%, climate change scenarios and 0.1% modelled extent.

- The proposal will be increasing the vulnerability (In NPPF Annex 3 Car Parks are considered Less Vulnerable and residential are considered More Vulnerable) and as a result increasing occupants. As more vulnerable is being proposed (from a carpark to residential use including a hotel with 35 units) this is considered not appropriate according to Table 2 of the flood risks section of the PPG.
- There is no known existing built footprint so by proposing “up to a maximum of 35 units”, the proposal will be increasing built footprint and in the Level 2 SFRA, section 3.3.2 has highlighted that “it will not be possible to provide level-for-level and volume-for-volume floodplain compensation storage within the development sites for any increase in building footprint”. Therefore, how will the floodplain compensation be provided for the loss of floodplain storage up to the 1 in 100 plus appropriate allowance for CC.
- In Spelthorne’s SFRA Level 2 Appendix B for Riverside Car Park it states “Modelling outputs for the River Thames for the 1% AEP event including a 35% increase in peak river flows as a result of climate change **indicates flood depths of 0.5-1m**. The hazard rating is Significant (Danger for Most)”.
- As stated in PPG 49 and in 5.6.7 in the SFRA Level 1, voids and stilts should not be used for providing compensation for any loss of flood plain storage and we would have concerns making a building floodable.
- In the site-specific recommendations in Appendix B it states “*The modelling for the River Thames indicates there is currently no dry or low hazard access route available during the 1% AEP including 35% climate change allowance. In order to cross the railway line and leave the floodplain, parts of the route along the A308 are defined as Significant hazard (‘Danger for Most’)*”
- *Section 3.3.3, section 3.3.4 and Table 3-2 site ST4/010 all refer to “buildings to be floodable or raised with floodplain storage beneath”*. As per our previous advice, we would not accept stilts/undercrofts/voids as acceptable floodplain storage, we would normally ask for such references to be removed from the document.

**ACTION** based on the reasons provided above we do not consider that these sites can be delivered. **We therefore ask that these sites - ST4/002 and ST4/010 are removed from the local plan.**

**ACTION** The term ‘dry hazard’ should be changed to low hazard/No Danger to people.

**ACTION:** Are all these sites proposed for Year 11-15? as some in Table 3.2 in Level 2 SFRA are saying different years. **Please can you confirm.**

### **Appendix B**

For ST4/019 updated now to state residential and commercial. **No comments**

For some sites (where relevant), AECOM has added a sentence in summary section of site assessments to highlight about CC allowances and neighbouring catchments. **No comments**

AECOM has replaced the wording of “places of safe refuge should also be designed into the development” for “places of safe refuge should also be identified outside the flood extent for the design event (1% AEP including climate change)”. **No comments.**

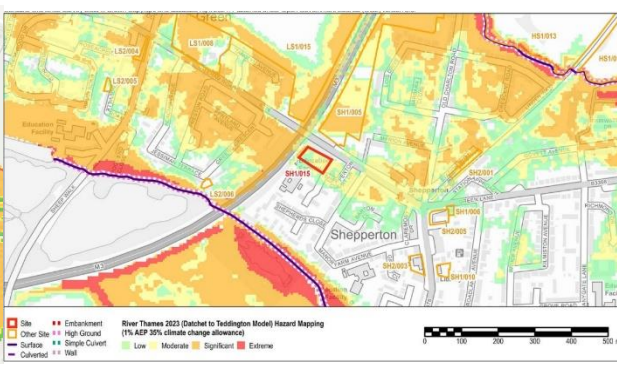
Site assessments now refer to which catchment should be used when assessing climate change (where relevant). **No comments**

We previously mentioned the outlines did not appear correct in Appendix B, in the response you mentioned that these were corrected. However, we have double checked, and there appears to be an issue still. Please see below to better indicate this. For SH1/015 the site the hazard is also shown to include Danger for most as shown is screenshot 1, rather than danger to some as shown in screenshot 2. We have noticed several sites where the hazard does not appear to represent the risk correctly. Please can you check the mapping.

We have provided the link to Thames (Datchet to Teddington) 2023 model (Product 6 – model outputs for the Thames and Thames Trib scenarios) <https://ea.sharefile.com/d-s96b058c67a51487dad1b3c7aa54802b5>



Screenshot 1



Screenshot 2

We queried that some maps did not show proposed access routes. AECOM have stated these have been provided where roads names were not easily visible. **No comments**

For sites where it appears plot size has changed between different versions of the SFRAs. AECOM has said no change in their latest response. Our understanding is that the plot sizes are current and correct in Appendix B. AECOM/SB to confirm our understanding that is the case.

**Development footprint**

**ACTION** In Table 3.2, it states for some sites that there is existing development on site, and which lies within the 1 in 100 plus appropriate allowance for climate change and in section 3.3.2 that it may not be possible to provide level for level and volume for volume compensation within site for any increase built footprint. Table 3.2 states that development should not exceed existing. Sites are listed as: ST1/031, ST3/012, AT1/012, ST4/009, SH1/015, ST4/010, ST4/026 and ST4/002. We previously asked what the current footprints for these sites was. Can the number of units proposed on that given site be delivered and if not, what impact will this have on the local plan?

Has there been any consideration on how policy E3 and SFRA Level 1 will apply for those allocated sites highlighted in Table 3.2 in red particularly but also the orange highlighted ones?

**River Thames Scheme (RTS)**

RTS scheme will provide benefit to people and property across Spelthorne, however due to the stage the project is at, it should not be solely relied on for delivery of the Local Plan or when determining individual planning application. We are happy to work with you to understand the benefit the RTS would provide.

SBC have again queried the reason why the Local Plan site allocations cannot rely on the RTS following our previous advice.

There should be no reliance on RTS because it is at the early stages and the Development Consent Order for RTS has not yet been submitted and is unlikely to be submitted until next year. When considering the period in which the sites are expected to be delivered, there is no guarantee that the scheme would be in place and make the sites deliverable 'during' this plan period. The Scheme is being developed to reduce flood risk to existing properties and should not be considered as infrastructure that will free up land for development or change flood zones or remove hazard associated with flooding.

It is important to note, that even following the completion of the scheme, flood risk modelling will have to be run for the 'as built' scheme and only after that will/can any changes be made to the Flood Maps for Planning which would then impact on any future development proposed (probably rebuilds and extensions etc) behind this defence/or offer a standard of protection or reduce overall flood risk. All this will take time and hence you can understand why along with the uncertainty of the approvals process we advise that this plan should not rely on the scheme to deliver development. Spelthorne Borough Council therefore need to make the decision themselves considering the information they have been given about the RTS, on removing allocated sites until the next plan making review period or identifying other infrastructure needs required to safely deliver these sites within the plan period.

So, the question really for the LPA(SBC) is; without relying on the RTS can the LPA successfully deliver these sites, ensuring they are safe and do not increase flood risk to surrounding areas? We are unable to answer these questions for you as the LPA.

Below are examples where caution is given regarding reliance on a flood relief/conveyance channel or flood defence scheme in relation to development.

## Flood Risk within the Leeds District

The first phase of the Leeds Flood Alleviation Scheme (LFAS1) and the second phase of Leeds Flood Alleviation Scheme (LFAS2, currently under construction) reduce the risk of river flooding from the River Aire to Leeds City Centre. There are also flood defence structures reducing the risk to other towns and communities within the Leeds District. These structures may increase the standard of protection provided to properties situated behind them, but there is always a residual risk that these structures may be overtopped in more extreme flood events or suffer failures such as breaching. It is important, therefore, that future development takes careful consideration of the standard of protection provided by these structures, the maintenance arrangements and any possible risk to life in the event of defence failure. This underlines the NPPF requirement that development should only be located within areas shown to be at medium and high flood risk on the Flood Map for Planning where the flood risk Sequential Test and, as necessary, the Exception Test have been passed.

Source: [Local Plan Update - SFRA 2022.pdf \(leeds.gov.uk\)](#)

In recent years, substantial investment has been made to alleviate the risk of flooding within the Royal Borough, by implementation of schemes such as Windsor and Eton Alleviation Scheme. It is important, however, to recognise that flood defences do not fully remove the risk of flooding and a residual risk will always remain. Properties behind flood defences within the Borough are at risk of flooding from other sources, such as groundwater or surface water flooding.

Source: [Strategic flood risk assessment | Royal Borough of Windsor and Maidenhead \(rbwm.gov.uk\)](#)

[Jubilee River flood alleviation scheme - GOV.UK \(www.gov.uk\)](#)

### **Examples of possible wording to be added to site allocations within the Spelthorne Local Plan**

The sites listed below have access and egress issues and there should be a clear demonstration within the plan that a safe access and egress has been provided.

1. Shepperton Youth Centre (SH1/015)
2. Shepperton Library (SH1/010)
3. Shepperton Delivery Office (SH2/003)
4. Leacroft Centre (ST1/028)
5. Thameside House (ST1/037)
6. Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street (ST4/002)
7. 96-104, Church Street (ST4/004)
8. The Elmsleigh Centre and adjoining land, South Street (ST4/009)
9. Riverside Surface, Carpark, Thames Street (ST4/010)
10. Debenhams site, 35-45, High Street (ST4/019)
11. Two Rivers Retail Park Terrace, Mustard Mill Road (ST4/023)
12. Frankie & Benny's/Travelodge, Two Rivers (ST4/024)
13. Land at Coppermill Road, Coppermill Road (ST4/025)
14. Communications House (ST4/026)
15. William Hill / Vodafone, Monsoon (ST4/028)

**ACTION** If SBC intends to allocate the above sites with access/egress issues, as we have already mentioned in our comments that there should be a robust policy wording. We ask that the below points are considered to develop a policy.

**Please note that you as the LPA need to consider wording your policy clearly highlighting the risk in delivering these sites listed above.**

- The site will not be available for development until Year X (Can SBC confirm/clarity the period they intend to deliver the above sites? Refer to our question on page 8) of the plan. If the site is proposed before this time period planning permission will not be granted.
- If the sites in Year X cannot be delivered during the lifetime of the local plan SBC would need to consider removing it from the plan unless there will be significant infrastructure in place to reduce the risk and ensure access and egress can be provided and maintained during flood events up to and including the 1% AEP plus an allowance for climate change flood event.
- If the expectation is for the developer to provide infrastructure, this must be in place before any built development can commence on the site. There needs to be a planning mechanism or legal agreement that secures the need for infrastructure to be provided on the site and be part of the allocation for its lifetime. This agreement cannot be varied or removed at any time of the lifetime of the development due to its essential function of providing safe access and egress for any development on the site/land. Any development must take this infrastructure need into consideration.

creating a better place



Jane Robinson  
Local Plans Manager  
Spelthorne Borough Council  
Knowle Green,  
Staines  
TW18 1XB

Date 1 July 2024

Dear Jane

**Spelthorne Borough Council, Local Plan review- Strategic Flood Risk Assessment (SFRA) Level 1 and 2 – Clarification on site allocation ST4/002 Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines.**

Thank you for your email of 29 June 2024 which clarifies the situation at the allocated site ST4/002.

We acknowledge the site - ST4/002 Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines, currently contains a car park, a former sea cadet building and an office block. We are happy to amend the definition. We ask that this letter is read in conjunction with our letter of the 21 June 2024.

You stated; “The description in the Local Plan stated: *“The site lies within the urban area. It is occupied by Bridge Street Car Park and the former Staines and Egham Group Sea Cadets building which originates from the 1980s. It comprises two levels of parking, of which the first-floor deck is broadly level with the adjacent Staines Bridge approach Road. The Cadets building is two storeys, located to the west of the car park and faces the River Thames. Hanover House is an office building located further west. It is two storeys in height with a traditional pitched roof design, with an area of hardstanding for parking to the rear.”*

Please note that the (Appendix B) of SFRA level 2 also states under the site-specific recommendations for site ST4/002 that; *“In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development within the design flood extent should not exceed that of the existing building and where possible should be reduced. As there is no existing built footprint on this site, this is likely to limit the number of units that can be delivered on the site.”*

Can Spelthorne Borough Council please clarify what this means or amend the SFRA accordingly.

We have provided you with a bit of an explanation below regarding development at this site.

Cont/d..

The site *contains a car park, a former sea cadet building and an office block*. The proposed development for this site is *leisure/recreational use to include a hotel with 158 units*, therefore, the proposal will be increasing flood risk vulnerability which is contrary to national policy. In NPPF Annex 3 Car Parks and Buildings used for professional, other services, assembly and leisure are considered 'Less Vulnerable' and the proposed which includes a hotel is considered 'More Vulnerable'.

Part of the site lies within the 3.3% modelled extent (which is the definition of functional floodplain in the Level 1 SFRA). The site is located within the (defended) 5%, 3.3%, 1%, climate change scenarios and 0.1% modelled extent.

The proposed development which is 'more vulnerable' development is considered incompatible in this flood zone (functional flood plain) according to Table 2 of the flood risks section of the PPG.

We have asked that this site ST4/002 Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines is removed from the local plan if Spelthorne Borough Council intend to use it for more vulnerable development. However, if there is footprint on the site as you have explained and Spelthorne Borough Council intend to develop this site, we recommend you consider a less vulnerable use, water compatible use or essential infrastructure in line with national planning policy, with no increased built footprint.

If you have any question, please contact me.

Yours sincerely

Judith Montford  
Planning Specialist

Direct dial 0208 026 3064

E-mail [Planning\\_THM@environment-agency.gov.uk](mailto:Planning_THM@environment-agency.gov.uk)



## Appendix 1

**From:** Robinson, Jane <J.Robinson@spelthorne.gov.uk>  
**Sent:** Friday, June 28, 2024 1:47 PM  
**To:** Planning\_THM <Planning\_THM@environment-agency.gov.uk>  
**Cc:** Richardson, Laura <L.Richardson@spelthorne.gov.uk>; Read, Nick <nick.read@environment-agency.gov.uk>; Lusby-Gordon, Dean <Dean.Lusby-Gordon@environment-agency.gov.uk>; Parr, Ivan <ivan.parr@environment-agency.gov.uk>; Kipling, Sam <sam.kipling@environment-agency.gov.uk>  
**Subject:** RE: EA comments

Some people who received this message don't often get email from [j.robinson@spelthorne.gov.uk](mailto:j.robinson@spelthorne.gov.uk). [Learn why this is important](#)

Hi Judith,

Again, many thanks for getting back to us to the agreed a deadline. We really appreciate it.

We are very clear on your statement “We ask that these sites - ST4/002 and ST4/010 are removed from the local plan” and are not requesting you change this. However, on a technical point on page 7 when referring to Site ST4/002 Bridge Street Car Park you state:

*“It states in the SFRA and site-specific recommendations (Appendix B) “The built footprint of the new development should not exceed that of the existing building and where possible should be reduced”. **The site is currently a car park and therefore does not have a ‘built footprint’ in relation to flood risk impacts”.***

The site name is “Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines”. The description in the Local Plan stated:

*“The site lies within the urban area. It is occupied by Bridge Street Car Park and the former Staines and Egham Group Sea Cadets building which originates from the 1980s. It comprises two levels of parking, of which the first-floor deck is broadly level with the adjacent Staines Bridge approach Road. The Cadets building is two storeys, located to the west of the car park and faces the River Thames. Hanover House is an office building located further west. It is two storeys in height with a traditional pitched roof design, with an area of hardstanding for parking to the rear.”*

I’ve attached some historic estate agent details of Hanover House for reference. The site contains a car park, a former se cadet building and an office block so definitely had “a built footprint”.

Please can you amend this and reissue your letter ASAP?

Thank you very much for suggesting further points for us to consider in our wording for the 15 sites. Please can we meet to discuss? I am free:

Monday 1 July – 9am to 10am and 12.30pm – 3pm

Tuesday 2 July 9am to 10am any time from 12.30pm onwards

Wednesday 3 July 9am to 10am, 11.30am to 1pm and 2.30pm onwards

Monday 8 July – any time to 4pm

Many thanks,  
Jane

End

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**Local Plan - 15 Sites where issues have been identified with flooding (first two sites), safe access and egress, and dry islands**

Site	No. of units	EA comment	SBC Position
Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street (ST4/002)	0	Danger for Most	Agreed on 29/02/24 to retain at 1 – 5 years) (unless taken out as a site allocation <b>Proposed to ask for a Main Modification to Remove the site</b>
Riverside Surface, Carpark, Thames Street (ST4/010)	35	Danger for Most	Agreed on 29/02/24 to retain at 11 – 15 years) (unless taken out as a site allocation <b>Proposed to ask for a Main Modification to Remove the site</b>
<b>No. of units proposed to be removed</b>	<b>35 (on 2 sites)</b>		
Thameside House (ST1/037)	140	Danger for Most and Access includes Danger for Most  SBC commentary - Long narrow site. Small section of site (nearest river)	Agreed on 29/02/24 to retain years 1 – 5 <b>No further change to proposed years</b> Pedestrian access shown to be available at Low hazard beneath railway line, through to George Street and Kingston Road
<b>No. of units proposed to be retained years 1- 5</b>	<b>140 (on 1 site)</b>		
96-104, Church Street (ST4/004)	100	Hazard varies but includes Danger for Most	Agreed on 29/02/24 to retain in years 6 – 10 <b>No further change to proposed years</b>
Debenhams site, 35-45, High Street (ST4/019)	150	Access Danger for Most	Agreed on 29/02/24 to retain in years 6 – 10 <b>No further change to proposed years</b>
Two Rivers Retail Park Terrace, Mustard Mill Road (ST4/023)	750	Access Danger for Most	Agreed on 29/02/24 to retain in years 6 – 10 <b>No further change to proposed years</b>
Frankie & Benny's/Travelodge, Two Rivers (ST4/024)	55	Access Danger for Most	Agreed on 29/02/24 to retain in years 6 – 10 <b>No further change to proposed years</b>
<b>No. of units proposed to be</b>	<b>1,055 (on 4 sites)</b>		

**APPENDIX E**

<b>retained years 6 - 10</b>			
Shepperton Youth Centre (SH1/015)	24	Hazard varies but includes Danger for Most	Agreed 29/02/24 to move to years 11 -15 <b>No further change to proposed years</b>
Shepperton Library (SH1/010)	10	Dry Island – Access includes Danger for Most	Agreed on 29/02/24 to retain at 11 – 15 years <b>No further change to proposed years</b>
Shepperton Delivery Office (SH2/003)	10	Dry Island – Access includes Danger for Most	Agreed on 29/02/24 to retain at 11 – 15 years <b>No further change to proposed years</b>
Leacroft Centre (ST1/028)	17	Hazard varies but includes Danger for Most	Agreed on 29/02/24 to move to 11 – 15 <b>No further change to proposed years</b>
The Elmsleigh Centre and adjoining land, South Street (ST4/009)	850	Pedestrian access shown to be available at Low hazard beneath railway line, through to George Street and Kingston Road.	Agreed on 29/02/24 to retain at 11 – 15 years (due to time to develop large site not flooding) <b>No further change to proposed years</b>
Land at Coppermill Road, Coppermill Road (ST4/025)	15	Low hazard site	(not discussed on 29/02/24 but years 11 - 15) <b>No further change to proposed years</b>
Communications House (ST4/026)	120	Access Danger for Most	Agreed on 29/02/24 to retain at 11 – 15 years <b>No further change to proposed years</b>
William Hill / Vodafone, Monsoon (ST4/028)	14	Access Danger for Most	Agreed on 29/02/24 to retain at 11 – 15 years <b>No further change to proposed years</b>
<b>No. of units proposed to be retained years 11 - 15</b>	<b>1,060 units (on 8 sites)</b>		