

Contact:

See individual reports

## **Members' briefing pack**

**Tuesday, 17 January 2023**

Items in this briefing pack:

	<b>Page nos.</b>
1. <b>Q2 Capital Monitoring Report (July-September)</b>	<b>1 - 12</b>
2. <b>Purchase of electric Taxis - Project Update</b>	<b>13 - 14</b>
3. <b>River Thames Scheme Update</b>	<b>15 - 80</b>
4. <b>Update on Housing Register</b>	<b>81 - 102</b>

**Spelthorne Borough Council, Council Offices, Knowle Green**

**Staines-upon-Thames TW18 1XB**

[www.spelthorne.gov.uk](http://www.spelthorne.gov.uk) [customer.services@spelthorne.gov.uk](mailto:customer.services@spelthorne.gov.uk) Telephone 01784 451499

This page is intentionally left blank

# Members Briefing Pack

January 2023



<b>Title</b>	<i>Quarter 2 (30 September 2022) Capital Monitoring report</i>
<b>Purpose of the report</b>	To note
<b>Report Author</b>	<i>Paul Taylor Chief Accountant</i>
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Corporate Priority</b>	Community Affordable housing Recovery Environment Service delivery
<b>Recommendations</b>	<p><b>The Committee is asked to note the £23m overspend (June: (£8.6m) underspend) on capital expenditure against its Capital Programme provision as at 30 September 2022 for the Council and in particular the Corporate Policy &amp; Resources Committee.</b></p> <p><b>(Please note that individual committees will receive a full copy of this report for noting once this report is issued as part of the papers for Corporate Policy and Resources Committee (CPRC) and that the Elmsleigh project has been disaggregated from 1 April 2022.</b></p>

## 1. Changes to the report since last quarter

1.1 Following feedback received from individual Councillors and the Committees, Officers have made the following changes and comparative figures have been restated:

- (a) All the property acquisitions associated with the Community Wellbeing and Housing Committee have been moved to show under Corporate Policy & Resources Committee.
- (b) The car park management systems previously shown in Environment & Sustainability have been moved to Neighbourhood Services & Enforcement Committee.
- (c) Four projects which are no longer proceeding, as shown in section 4 below, have been removed from the Capital Programme.
- (d)

## **2. Summary of the report**

- 2.1 This report seeks to update Councillors on the performance of our capital projects against the approved budget, as at 30 September 2022 and the projected overspend of £23.0m (June: underspend of (£8.5m)).
- 2.2 Please note that this report is based on activity at 30 September 2022, subsequent events may have changed and if material, will be highlighted in the report, for example, Officers are exploring with Homes England the possibility of obtaining up to 25% grant funding of the total costs on the Council's development properties.

## **3. Key issues**

- 3.1 The Capital Monitoring report covers the cumulative actual expenditure to date, against the cumulative Council approved Capital Programme budget and compares this against the latest forecast outturn from Officers.
- 3.2 Although the projects may have a budget allocation in the Capital Programme, any increases in budget will require prior approval by Corporate Policy & Resources Committee before drawing down on the budget.
- 3.3 Officers are beginning to see the impact of Brexit, longer term economic impacts of COVID-19 on our building costs, availability of labour and shorter fixed price guarantees from building suppliers. Over the next few years the uncertainty around the inflationary risk to our development projects, is not clear. As with the Bank of England forecasts, some commentators expect to see construction cost inflation rise, while others predict a fall. The impact of global events continues to influence commodity prices, whilst Brexit has created a shortage of labour in the construction sector, and finally the impact of the Cost-of-Living crisis cannot be ignore. Therefore, and taking these issues into account, Officers will continue to closely monitor these risks and assess the impact on our Estimated Capital Programme for 2022/23 to 2025/26. Therefore, it is critical that planning consents are obtained so that capital investment commitments can be made at the most financially advantageous time without further delay.
- 3.4 As reported last quarter, (30 June 2022) Officers continue to monitor the impact of inflation on the material and labour costs for our development contracts, which is forecast to have a £40m+ adverse impact on the Council's Capital budgets (over the current 2022/23 to 2025/26 estimated Capital Programme) and this will have a knock-on impact on our revenue budgets due to increased interest charges, as notified by the Public Works Loan Board (PWLB) and greater costs to be financed.
- 3.5 Further, a number of projects have been handed over as completed, such as West Wing, Benwell House Phase 1 and Whitehouse Hostel, and are awaiting final contracts to be signed off. Officers don't believe that there will be any significant further increase in the forecast for these projects.
- 3.6 For the quarter ended 30 September 2022 the approved Capital Programme was £374.3m (June: £394.1m). The latest forecast outturn position is £397.3m (June: £385.6m), giving a projected aggregate overspend of £23.0m (June: underspend (£8.5m)) as per Appendix A below. Until planning consent is granted, and final terms have been negotiated for build contracts, there is likely to be ongoing fluctuation due to construction market volatility.

- (a) Please also note, as shown below four assets have been removed from the capital programme this quarter, as they are no longer proceeding, hence the difference in the approved capital programme figures.
- 3.7 The projected aggregate over/underspend by Committee as per Appendix B is as follows:
- (a) Administrative – projected underspend (£1.7k) (June: underspend (£171k)).
  - (b) Community Wellbeing & Housing – projected over/underspend £nil (June: over/underspend £nil restated). No change since last quarter.
  - (c) Environment & Sustainability – projected overspend £104k (June: overspend £87k) no change since last quarter.
  - (d) Corporate Policy & Resources Committee – projected overspend £22.9m (June: underspend (£8.5m) restated).
  - (e) Neighbourhood Services & Enforcement – no projected over/underspend (June: no projected over/underspend – restated)
- 3.8 In arriving at the cumulative expenditure to date, the Finance Team account for capitalised borrowing costs, salaries, and all costs of acquisition on each development project.
- 3.9 As highlighted last quarter, the average **monthly cost** to the Council for the delays in moving the development properties forward is **£170k** (£140k revenue and £30k capital) for the quarter ended 30 September 2022, (June: unchanged).
- 3.10 Officers are forecasting that as the Council comes to renew its short-term borrowing (three to twelve months maturity) and with current market interest rates have risen by over 250% in the last six months, from January 2023, they anticipate that the monthly short term borrowing costs will increase by over £90k per month.
- 3.11 **Capitalisation of borrowing costs**
- 3.12 Under normal circumstances, Officers would capitalise the borrowing costs associated with the six development properties in the Staines-upon-Thames area based on the requirements of section 4 of the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice on Local Authority Accounting. However, the delays caused by the moratorium, planning submission approval processes and the Planning Committee process in approving the Council's plans has had a significant impact on the Council's finances.
- 3.13 As the Council progresses with the plans for each development, following the end of the moratorium, Officers, in consultation with our external auditors, will have to reassess each project and if the design of the buildings has significantly altered, once the Planning Committee has approved the revised plans and in order to comply with the above CIPFA Code, Council may have to charge the design fees for the previous building designs from Capital to the Revenue budget and this could have a significant adverse impact on the revenue outturn, increasing the predicted budget deficit even further.

#### 4. Variance analysis

- 4.1 We report on any significant movement in forecast variance over £50k or 20% of budget, whichever is the highest, or if there has been a significant development since last quarter, by committee as follows:
- 4.2 Administrative – projected underspend (£1.7k) (June: underspend (£171k))
- (a) Scan Digital Rollout – Over/underspend £nil (June: underspend (£20k))  
Data scanning progressing well has now been incorporated within the digital transformation processes, which will reduce paperwork and thus the need for scanning. Funds will no longer be required and has been **REMOVED FROM THE CAPITAL PROGRAMME.**
  - (b) Corporate Electronic Document Management System (EDMS) Project – Over/underspend £nil (June: underspend (£131k)). A substantial amount of the work will be dealt with from the SharePoint budget (Cost centre 43512) and therefore £131,200 is no longer required and has been **REMOVED FROM THE CAPITAL PROGRAMME**
  - (c) Forward Scanning – Over/underspend £nil (£20k) (June: underspend (£20k))  
Data scanning progressing well has now been incorporated within the digital transformation processes, which will reduce paperwork and thus reducing need for scanning. Funds no longer required and has been **REMOVED FROM THE CAPITAL PROGRAMME.**
- 4.3 Community Wellbeing & Housing – Projected Over/underspend £nil (June: over/underspend £nil - restated)
- (a) As mentioned in 1.1 (a) above, from 1 July the development properties were transferred to Corporate Policy & Resources Committee
- 4.4 Environment & Sustainability – projected overspend £104k (June: £83k overspend)
- (a) Laleham Park Upgrade – Overspend £104k, (June: overspend £87k)  
Cost inflation is impacting on this project and Officers will shortly be submitting revised plans for approval by the Development Sub Committee, to increase the budget.
- 4.5 Corporate Policy & Resources – Overspend £22.9m (June: underspend (£8.5m) restated).
- (a) Ashford MSCP – Overspend £1.3m, (June: overspend £1.6m) due to building material and labour cost inflation, Development Sub Committee approved £267k increase in budget for additional design fees. A further budget increase proposal will be submitted in December 2022 for approval based on the revised costs and latest design proposals.
  - (b) Benwell House Phase 1 Development & Build costs – Underspend (£2.6m) (June: underspend (£2.7m)). An additional £100k was spent on replacement trees.
  - (c) Victory Place – Overspend £6.0m (June: £nil under/overspend), due to building cost inflation and delays in getting pre commencement conditions discharged.

- (d) Thameside House – Overspend £26.7m (June: overspend £1.5m) based on current reduced height scheme planning application proposal agreed at Development Sub Committee and subject to final budget approval, once all viable options have been reviewed and submitted to that committee, as the current project is not viable for KGE.
- (e) Oast House – Underspend (£6.1m) (June: overspend £13.4m). As directed by Corporate Policy & Resources Committee at their July meeting, Officers will present in October, a revised budget based on the plans currently being finalised, to Development Subcommittee for approval.
- (f) Acquisition of a potential housing/regeneration asset – **REMOVED FROM THE CAPITAL PROGRAMME**
- (g) 91/93 High Street – No change - Underspend (£1.2m) (June: underspend (£1.2m)) Please note that these projects have been disaggregated from the global budget for the Elmsleigh Centre, with effect from 1 April 2022
- (h) Former Decathlon unit – No change - Underspend (£2m). (June: underspend (£2m)) Subject to signing the contract with Surrey County Council, this capital expenditure is no longer required and the capital programme will be amended to reflect this saving.

4.6 Neighbourhood Services & Enforcement - Over/underspend £nil (June: over/underspend £nil – restated)

- (a) As mentioned in 1.1 (b) above, the two car park management systems projects were transferred from Environment & Sustainability Committee and both projects have not commenced yet.

## 5. Financial implications

- 5.1 Once a project is completed, any underspend on the approved Capital Programme enables the Council to invest the monies to gain additional treasury management investment income or to fund additional schemes.
- 5.2 Working closely with our Treasury Management advisors, Officers are currently saving the Council more than £1,300k per annum in interest charges, through prudent use of short-term interest rates to fund regeneration development projects.
- 5.3 Upon completion of each project, Officers obtain fixed rate interest loans to significantly reduce the Council's exposure to risk of future interest rate rises over the next 50 years.

## 6. Risk considerations

- 6.1 The significant risks for our capital programme continue to be the delay in commencing our development projects, seeing costs rise as the construction industry experiences significant inflationary increases in building and labour costs. Further, the recent upward trend in interest base rates is impacting on our development properties, as the Council funds these projects from short term borrowing, before fixing the loan interest via the Public Works Board on completion of each project.

## **7. Procurement considerations**

7.1 None.

## **8. Legal considerations**

8.1 None.

## **9. Other considerations**

9.1 During 2022/23 Officers will be expected to progress their capital projects, and where projects have not commenced, may be requested to cancel the project and reapply for capital funds, so that the unused funds can be utilised elsewhere by Council, rather than being tied up in projects that are not progressing.

## **10. Equality and Diversity**

10.1 This Council is committed to delivering equality, improving diversity and being inclusive in all our work as a service provider and an employer.

10.2 We incorporate equality into our core objectives, making every effort to eliminate discrimination, create equal opportunities and develop good working relationships between different people.

## **11. Sustainability/Climate Change Implications**

11.1 Spelthorne Borough Council has declared a climate emergency and each capital project will be looking to reduce its carbon footprint within the financial constraints imposed on it.

## **12. Timetable for implementation**

12.1 Not applicable.

## **13. Contact**

13.1 Paul Taylor [p.taylor@spelthorne.gov.uk](mailto:p.taylor@spelthorne.gov.uk)

**Background papers: None.**

### **Appendices:**

**Appendix A** – Summary Capital Monitoring Report by Committee as at 30 September 2022.

**Appendix B** – Detailed Capital Monitoring Report by Committee as at 30 September 2022.



## CAPITAL MONITORING REPORT AT 30 SEPTEMBER 2022

Portfolio / Service Head	Cost Centre	Description	Current Budget	Cumulative Actuals to date for the project	Managers Projected Outturn at 30 September	Cumulative Budget vs Projected Outturn Variance	Comments
--------------------------	-------------	-------------	----------------	--	--	---	----------

**Community Wellbeing & Housing**

Karen Sinclair	42014	LOCATA	49,900	0	49,900	0	Project in progress
<b>Committee Total</b>			<b>£49,900</b>	<b>£0</b>	<b>£49,900</b>	<b>£0</b>	

**Housing Investment Programme****Community Wellbeing & Housing- DFG Annual Programme**

Karen Sinclair & De	40203	Disabled Facilities Mandatory	943,200	423,362	943,200	0	
Karen Sinclair & De	40204	Disabled Facilities Discretion	29,600	10,203	29,600	0	
		Grants received from Central Government	-943,200	-423,362	-943,200	0	
		Grants received from brought forward surplus	-29,600	-10,203	-29,600		
<b>Net Cost of Disabled Facilities Grants</b>			<b>£0</b>	<b>-£0</b>	<b>£0</b>	<b>£0</b>	Annual Programme
<b>Total For HIP</b>			<b>£0</b>	<b>-£0</b>	<b>£0</b>	<b>£0</b>	

**Neighbourhood Services & Enforcement**

Jackie Taylor	41302	Car Park Mgmt. System Update	250,000	0	250,000	0	Currently on hold pending an update from SCC who are taking back this service.
Jackie Taylor	41308	Car Park Mgmt. & Issue System	50,000	0	50,000	0	Currently on hold pending an update from SCC who are taking back this service.
<b>Committee Total</b>			<b>£300,000</b>	<b>£0</b>	<b>£300,000</b>	<b>£0</b>	

## CAPITAL MONITORING REPORT AT 30 SEPTEMBER 2022

Portfolio / Service Head	Cost Centre	Description	Current Cumulative Budget	Cumulative Actuals to date for the project	Managers Projected Outturn at 30 September	Cumulative Budget vs Projected Outturn Variance	Comments
<b>Environment &amp; Sustainability</b>							
Jackie Taylor	41503	Replacement Refuse Vehicle	80,000	0	80,000	0	We anticipate orders being agreed October 22 delivery may potentially slip into 23/24 due to supply issues
		External Funding	-45,000	0	-45,000	0	This income is an insurance payback and offsets the item above
Jackie Taylor	41606	County Transit Site	127,000	0	127,000	0	Project on hold until site can be agreed. This is a contribution towards cost of a site in another part of the County.
Jackie Taylor	41608	River Ash Broadwalk	150,000	0	150,000	0	This project is now with the procurement team
		Bronze field reserve Funding	-150,000	0	-150,000	0	
Jackie Taylor	41609	Replacement Spelride Bus	100,000	0	100,000	0	More electric minibuses are now available for consideration and a new tender exercise will commence later this year.
Jackie Taylor	41615	Laleham Nursery Portacabins	116,000	0	116,000	0	Work is in progress and options are being considered, with an update next quarter.
Jackie Taylor	41620	Wheelie Bins - annual programme	50,000	44,378	50,000	0	Wheelie bins purchased as and when supply demands through the year
		<b>Total</b>	<b>£428,000</b>	<b>£44,378</b>	<b>£428,000</b>	<b>£0</b>	
Tracey Willmott-French	41314	Air Quality	24,500	0	24,500	0	In May2022, Scenario modelling required to progress the AQ action planning has been put on hold whilst as Councillors want traffic modelling at Moor Lane (near the M25) and residential roads alongside the A30 Georgian Close included in the work (these areas were not originally included as the nearest monitoring points did not meet the aq monitoring level criteria). The modelling has been commissioned with the consultants (£8500) and the necessary traffic count data to enable this has been requested from SCC. However, the data is not available and SCC are considering how the data might be provided. Discussion with SCC is ongoing.
		<b>Total</b>	<b>£24,500</b>	<b>£0</b>	<b>£24,500</b>	<b>£0</b>	
Lee O'Neil	41026	Laleham Park Upgrade	250,000	70,521	353,500	103,500	Demolition works completed in 21/22. As per Dev Sub meeting, officers will be submitting new plans for approval.
		<b>Total</b>	<b>£250,000</b>	<b>£70,521</b>	<b>£353,500</b>	<b>£103,500</b>	
		<b>Committee Total</b>	<b>£702,500</b>	<b>£114,899</b>	<b>£806,000</b>	<b>£103,500</b>	

## CAPITAL MONITORING REPORT AT 30 SEPTEMBER 2022

Portfolio / Service Head	Centre	Description	Current Cumulative Budget	Cumulative Actuals to date for the project	Managers Projected Outturn at 30 September	Cumulative Budget vs Projected Outturn Variance	Comments
<b>Corporate Policy &amp; Resources</b>							
Karen Sinclair	42074	Property acquisition for families	35,000,000	0	35,000,000	0	£35m to be spent over the next 5 years. Project is currently on hold due to the impact of the mini budget on the borrowing rate
Lee O'Neil	41024	Spelthorne Leisure Centre Development	48,370,000	4,201,128	48,370,000	0	Main build contract signed. Enabling works completed and groundworks package has commenced.
Lee O'Neil	41328	Ashford MSCP Residential Scheme	15,267,000	171,879	16,600,000	1,333,000	Public consultation completed early July, undertaking a second planning pre-app meeting and targeting a November planning submission. The forecast increase shown is due to the anticipated increase in construction costs since the previous scheme was reviewed in October 2021. However, following the conclusion of the second pre-app meeting the design parameters will be frozen and an updated cost appraisal will be run.
	42042	Benwell Development & Building cost Phase 1	13,800,000	11,179,871	11,200,000	-2,600,000	Project complete - additional costs incurred for replacement trees, still negotiating final account to be paid with developer.
	Memorandum Item	Benwell Land & Building cost Phase 1	10,123,100	10,746,000	10,746,000	622,900	Land acquired on 30/09/17.
	Memorandum Item	Whitehouse Land Acquisition	1,319,721	1,319,721	1,319,721	0	Land acquired on 30/09/17.
Lee O'Neil	42052	Whitehouse - Design Fees & Construction Phase B	3,910,000	657,862	3,800,000	-110,000	Planning application submission prepared. Reviewing KGE viability due to interest rate spike. Investigating Homes England grant funds then DSC report.
Lee O'Neil	42054	Thameside House	54,430,000	2,077,944	81,100,000	26,670,000	Planning submission targeted for end of Nov 22. Increasing build cost pressures continuing. Not KGE viable so HE funding being explored for residential parts (106 units).
	Memorandum Item	Thameside House Land & Building cost	9,860,000	9,700,000	9,700,000	-160,000	No change to reported financials
Lee O'Neil	42055	West Wing	5,780,000	5,722,605	5,850,000	70,000	Project complete - final account agreed and to be settled in Q3.
Lee O'Neil	42056	Whitehouse Hostel - Phase A	4,417,000	4,661,718	4,773,000	356,000	No change to financials. Project complete - negotiating final account to be paid.
Lee O'Neil	42057	Victory Place (Ashford Hospital car park site)	31,470,000	1,937,357	37,500,000	6,030,000	Delays in getting precommencement conditions discharged. Target demo start in Dec 22. Main build in 3/23. Not KGE viable so HE funding being explored.
	Memorandum Item	Victory Place Land Cost	5,260,000		5,260,000		
Lee O'Neil	42060	Oast House	105,200,000	22,147,223	99,100,000	-6,100,000	Significant cost increases due to moratorium & design consultations delays. Council approved 12+10+9 max storey heights residential + NHS centre on 28 April 2022. Public consultation undertaken, planning submission targeted end of November '22. Not KGE viable so HE funding being explored.
Lee O'Neil	42062	Harper House Redevelopment	3,451,000	3,184,504	3,451,000	0	No change to financials. Project complete - negotiating final account to be paid.
Lee O'Neil	42063	Elmsleigh Centre	5,350,000	1,515	5,350,000	0	To be reviewed upon Local Plan & Staines development framework. Previous budget of £18m split for projects at 91-93 High Street, Tothill Redevelopment & Decathlon. £5.35m left over after allocations.
Lee O'Neil	42065	91/93 High Street	6,000,000	74,200	4,792,000	-1,208,000	Public consultation completed in July. Targeting autumn planning submission. Inflation on costs may impact adversely on forecast. Expected to be delivered within budget.
Lee O'Neil	42066	Tothill MSCP	4,500,000	328,030	4,500,000	0	To be reviewed upon Local Plan & Staines development framework. Budget split from Elmsleigh Redevelopment budget of £18m. To early to forecast level of expenditure.
Lee O'Neil	42067	Decathlon Unit, Elmsleigh	2,150,000	0	150,000	-2,000,000	Full capital budget not required as current plan is for SCC to take on lease and redevelop in return for rent free lease for Staines Library. £150k required to install new passenger lift.
Lee O'Neil	42068	Elmsleigh Centre W.C	50,000	0	60,000	10,000	Designs completed, works expected to start end of Oct - cost expected to be £60k offset by £40k grant funding.
		WC Grant	-25,000	0	-40,000	-15,000	Grant funding received Aug '22.
Lee O'Neil	42069	Ashford Community Centre	3,500,000	0	3,500,000	0	This is with strategic planning team for further advise on the project.
Lee O'Neil	42070	Cedar Rec Toilet Block	250,000	0	250,000	0	This project is on hold and to commence subject to the Community Lettings Policy being reviewed by Councillors. A task group is to be set up to discuss the CLP. An updated forecast will be prepared once the CLP has been agreed.
Lee O'Neil	42071	Greeno Rec	1,200,000	0	1,200,000	0	This project is on hold and to commence subject to the Community Lettings Policy being reviewed by Councillors. A task group is to be set up to discuss the CLP. An updated forecast will be prepared once the CLP has been agreed.
Lee O'Neil	42072	Manor Park Pavilion	750,000	0	750,000	0	This project is on hold and to commence subject to the Community Lettings Policy being reviewed by Councillors. A task group is to be set up to discuss the CLP. An updated forecast will be prepared once the CLP has been agreed.
Lee O'Neil	42073	Revelstoke	400,000	0	400,000	0	No decision has been made about what to do with this piece of land yet. Forecast at budget.
Lee O'Neil	42075	Benwell II	0	119,241	0	0	Public consultation completed in July. Targeting autumn planning submission. Inflation on costs may impact adversely on forecast. Current forecast shows expected cost to complete project now.
Lee O'Neil	42076	Sandhill Meadow Bridge	200,000	0	200,000	0	approved by Dev Sub Com 16/5/22 - budget provision for £200k
<b>Committee Total</b>			<b>£371,982,821</b>	<b>£78,230,798</b>	<b>£394,881,721</b>	<b>£22,898,900</b>	

## CAPITAL MONITORING REPORT AT 30 SEPTEMBER 2022

Portfolio / Service Head	Cost Centre	Description	Current Cumulative Budget	Cumulative Actuals to date for the project	Managers Projected Outturn at 30 September	Cumulative Budget vs Projected Outturn Variance	Comments
<b>Administration</b>							
Lee O'Neil	42010	KG Car Park Improvements	120,000	120,274	120,274	274	Project complete. Budget virement has been processed to fund capital works from planned maintenance revenue budget.
<b>Total</b>			<b>£120,000</b>	<b>£120,274</b>	<b>£120,274</b>	<b>£274</b>	
Paul Taylor	43602	Centro Upgrade - Integra	30,000	21,070	28,000	-2,000	This project is expected to be completed in this financial year, the system is live and in the final stages, we need to iron out all the problems before we can proceed with the sign off, some funds have been saved due to less consultancy time.
Paul Taylor	43609	Centros Upgrade	190,000	0	190,000		Phase 1, will start once the Centros system has gone live.
<b>Total</b>			<b>£220,000</b>	<b>£21,070</b>	<b>£218,000</b>	<b>£0</b>	
Kamal Mehmood &	43604	Leisure Board	15,000	0	15,000	0	Discussions with Assets over the location of the board, but unlikely to be installed until the end of the financial year.
<b>Total</b>			<b>£15,000</b>	<b>£0</b>	<b>£15,000</b>	<b>£0</b>	
Alistair Corkish	43607	Recabling	200,000	0	200,000	0	Port audit is complete and results show we are unlikely to need to undertake a full recabling of Knowle Green. Some isolated work will be needed but is not expected to cost more than £20K
Alistair Corkish	43610	General Hard/Software - annual programme	50,000	0	50,000	0	Expected to be spent by end of this financial year
Alistair Corkish	43613	VDI Hosts	18,100	0	18,100	0	Expected to be spent by end of this financial year
Alistair Corkish	43614	Network Infrastructure	170,000	0	170,000	0	This project will begin Q3/Q4 and will carry on into 2023-24
Alistair Corkish	43615	Members Tablets	41,900	0	41,900	0	Procurement will be done in Q3
<b>Total</b>			<b>£480,000</b>	<b>£0</b>	<b>£480,000</b>	<b>£0</b>	
Roy Tilbury	43625	Customer Portal	8,000	0	8,000	0	To be spent in next few months as Council has chosen Granicus.
Roy Tilbury	43626	Customer Services Contact Cent	40,000	5,538	40,000	0	The remaining budget will be spent on further development of webchat and Ai during 22/23 and 23/24 as staff changes and resource issues paused development which is now being picked up
Roy Tilbury	43629	Net call Contact Centre	70,000	53,515	70,000	0	This will form part of the digital upgrade to be complete in 22/23 and 23/24 with remaining spend needing to be spread over two years due to resourcing issues
<b>Total</b>			<b>£118,000</b>	<b>£59,053</b>	<b>£118,000</b>	<b>£0</b>	
Sandy Muirhead	43502	Digital Spelthorne	50,000	0	50,000	0	Delays occurred in implementation as a result of strategy development and queries by Customer Services which has been resolved. Monies will be spent in this financial year.
Sandy Muirhead	43512	SharePoint redesign & Relaunch	155,000	0	155,000	0	SharePoint launch is being delayed as a result of staff recruitment delays. New member of staff has started in July 2022 but due to workload spend is expected in 22-23 & 23-24.
Sandy Muirhead	43515	Corporate EDMS Project	100,000	0	100,000	0	A substantial amount of the work will be dealt with from the SharePoint budget (Cost centre 43512 below) and this will be spent along with above work.
<b>Total</b>			<b>£305,000</b>	<b>£0</b>	<b>£305,000</b>	<b>£0</b>	
<b>Committee Total</b>			<b>£1,258,000</b>	<b>£200,397</b>	<b>£1,256,274</b>	<b>£274</b>	
<b>Total</b>			<b>£374,293,221</b>	<b>£78,546,093</b>	<b>£397,293,895</b>	<b>£23,002,674</b>	

## CAPITAL MONITORING REPORT AT 30 SEPTEMBER 2022

Committee	REVISED BUDGET	ACTUALS YTD	MANAGER'S PROJECTED OUTTURN	PROJECTED VARIANCE
Community Wellbeing & Housing- DFG Annual Programme	0	-0	0	0
Community Wellbeing & Housing	49,900	0	49,900	0
Neighbourhood Services & Enforcement	300,000	0	300,000	0
Environment & Sustainability	702,500	114,899	806,000	103,500
Corporate Policy & Resources	371,982,821	78,230,798	394,881,721	22,898,900
Administration	1,258,000	200,397	1,256,274	274
	<b>£374,293,221</b>	<b>£78,546,093</b>	<b>£397,293,895</b>	<b>£23,002,674</b>

This page is intentionally left blank

### Defra funded Electric Vehicle Taxi Project

*Following the Environment and Sustainability Committee Meeting on the 5<sup>th</sup> July where the Committee agreed to approve the amended project scheme, the legal opinion required by Defra with regard to the State Subsidy and Control Regulations was issued to Defra on the 24<sup>th</sup> of August with a view to Defra deciding whether the project could continue.*

*To date there has been no response from Defra. A reminder message was sent to Defra on the 15<sup>th</sup> November which has not yet been responded to.*

*The Environment and Sustainability Committee were concerned that the project did not facilitate accessible vehicles, it was explained that one London style Low Emission Capable vehicle was included in the project, but this was designated for Epsom and Ewell Borough Council due to demand amongst licenced drivers. These vehicles cost considerably more, and the project budget can only support the provision of the one London style vehicle to Epsom. The vehicle types on offer are reflective of the vehicles that drivers were utilising in Spelthorne at the time that the grant was applied for. Due to Spelthorne's Licencing Policy when the grant funding was applied for in 2020 Spelthorne's taxi fleet did not include London style vehicles, which are the only accessible zero emission capable vehicle that is widely available to taxi drivers on a hire arrangement as Spelthorne's Hackney Carriage and Private Hire Licencing Policy did not allow them to be licenced.*

*The Hackney Carriage and Private Hire Licencing Policy has been amended as below to improve this situation in the future and the policy allows a reduced fee for accessible vehicles to try and encourage better uptake amongst drivers.*

*A report was taken to the Licencing Committee on the 12<sup>th</sup> July 2022 to inform the Committee members of the project and to facilitate low and zero emission vehicles and improve accessibility which allowed the licencing of electric vehicles as taxi's in Spelthorne as an amendment to the Hackney Carriage and Private Hire Licencing Policy, and the licencing of London style cabs ("London LTI, Fairway and Metrocab or similar style of vehicle), for use as a Hackney Carriage. It was identified that these vehicles are wheelchair accessible, and by licencing them the accessibility of Hackney Carriages in Spelthorne could be improved.*

*The project will not be able to continue until approval is received from Defra who are providing the project funding.*

**Claire Lucas**  
**Principal Pollution Control Officer**

This page is intentionally left blank



## River Thames Scheme Members' Planning Briefing January 2023

### Background

The River Thames Scheme (RTS) extends from Runnymede through Spelthorne Borough and a small part of Elmbridge to the London Borough of Richmond. Many of the properties within the Thames floodplain have experienced repeated flooding, most recently in 2014, and the flooding risk will be exacerbated by climate change.

In response to this, the Environment Agency (EA) and Surrey County Council (SCC) will be submitting a Development Consent Order (DCO) to the Planning Inspectorate in 2024. This is a single application which will cover all boroughs and will seek to obtain permission to construct and maintain a Nationally Significant Infrastructure Project.

The RTS is designed to reduce the flooding risks to properties within its floodplain by improving the flow of water downstream. The scheme will involve the construction of a new river channel which will be built in 2 sections at Spelthorne and Runnymede. The scheme will also include capacity improvements within Elmbridge (Desborough Cut) and aims to enhance the natural environment around the river.

Officers at Spelthorne have been working in an internal joint technical group to address local issues raised as the RTS progresses. The group includes Planning DM, Environmental Health (contamination, air quality and noise), biodiversity and climate change. Regular meetings have been taking place, as an Officers Project Group, between the planning officers of Spelthorne Runnymede, Elmbridge and SCC. Stantec, a large international organisation with expertise in infrastructure design and delivery and in the DCO process, is supporting the authorities involved.

A web page providing information on the RTS has been set up here [The River Thames Scheme - RTS - latest - Spelthorne Borough Council](#) This will be updated during 2023/24 by planning officers.

### Scoping Opinion

In October 2022, as part of the DCO process, Spelthorne received a consultation by the joint applicants (EA and SCC) on an Environmental Impact Assessment (EIA) Scoping Report for the RTS in the Borough.

Scoping is the stage that sets out what needs to be assessed in the EIA to help define how to approach the assessment and what information may be needed to identify the likely significant effects from the development. The EIA will be submitted at a later date as part of the formal planning process which will take the form of an application for a Development Consent Order (DCO) to the Planning Inspectorate.

Officers were required to give feedback by the end of October and Members were advised of this in an email dated 12/10/2022. The consultation was referred to on the weekly publicity schedule of planning applications which all councillors received. The scoping documents were highly technical and the DM planners worked closely within the joint officer technical group and with other planning officers at SCC and Runnymede and Elmbridge Councils. A joint response from Spelthorne, Runnymede, Elmbridge and Surrey CC was submitted to the Planning Inspectorate on 02/11/22 and is attached as Appendix 1.

### Non Statutory Consultation

As part of the DCO process, the applicants undertook an additional (non-statutory) consultation in November 2022. This aimed to gather opinions from the general public, landowners, local authorities, community groups and environmental and regulatory organisations, on the proposals for the RTS. A joint response from Spelthorne, Runnymede, Elmbridge and Surrey CC was submitted to the Planning Inspectorate on 16/12/22 and is attached as Appendix 2. The response set out a number of principle areas of environmental concern and made several recommendations including advocating further engagement and technical workshops with the Council Officers Project Group to inform on-going design work for the RTS before design work advances.

The technical response to the non-statutory consultation was discussed with the Chairman and Vice Chairman of the Environment and Sustainability Committee and both expressed support for the approach taken.

Further member planning briefings will be issued during the DCO process.

Esmé Spinks  
Planning Development Manager  
06/01/23



November 2, 2022

**Dear Emily Park (Planning Inspectorate)**

**Reference: River Thames Scheme**

**PINS REF NO:** WA020001 (River Thames Scheme)

**DESCRIPTION:** Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 - Scoping Opinion Consultation

**PROPOSAL:** Application by Surrey County Council and Environment Agency for an Order granting Development Consent for the River Thames Scheme

I write in response to the statutory consultation received by Surrey County Council, Elmbridge District Council, Runnymede District Council and Spelthorne District Council (hereafter referred to as the Project Group) on 5th October 2022 in relation to the Environmental Impact Assessment (EIA) Scoping Report concerning the above development proposal.

The development is classed as a Project of National Significance, a Section 35 Direction was given by the Secretary of State (SoS) on 24 December 2020 and confirms that the project is nationally significant, and it should be treated as development for which development consent is required.

This letter (and Annex A) therefore constitutes the Project Groups' response to the River Thames Scheme EIA Scoping Report (2022) (hereafter referred to as the EIA Scoping Report) consultation issued by the Planning Inspectorate.

It should be noted that there is a clear separation of responsibilities and an information barrier in place between the officers performing a regulatory function within Surrey County Council and those advising and promoting the River Thames Scheme on behalf of the Applicant. Stantec will be supporting officers of The Project Group in performing Host Authority duties, as part of the Planning Act 2008 under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

If you have any queries, please do not hesitate to contact us. For any new consultations, or to provide further information on this consultation please send your correspondence to [claire.sorrin@stantec.com](mailto:claire.sorrin@stantec.com)

Kind Regards,

Caroline Smith (Surrey County Council - Planning Group Manager)



Victoria Gibson (Runnymede Borough Council - Development Manager Runnymede Borough Council)



Kim Tagliarini (Elmbridge Borough Council - Head of Planning and Environmental Health)



Esmé Spinks (Spelthorne Borough Council - Planning Development Manager)



# 1 Annex A - Scoping Opinion Response

## 1.1 Legislation

- 1.1.1 The project will be subject to an Environmental Impact Assessment (EIA), and the environmental effects reported within an Environmental Statement (ES). The proposed project meets the criteria of Schedule 2 paragraph 10 (h) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), being an “inland-waterway construction not included in Schedule 1 of these Regulations, canalisation and flood-relief works”.
- 1.1.2 The Project Group agree with the Applicant (Surrey County Council and the Environment Agency) that in relation to Schedule 3 of the EIA Regulations there is the potential for significant environmental effects based on the characteristics of the development, the location of the development and the type and characteristics of potential impact and an ES should be produced and submitted with a Development Consent Order (DCO) application,
- 1.1.3 Under Section 5(1) of the Planning Act 2008 (PA08), National Policy Statements (NPS) are designated by the Secretary of State (SoS) which set out national policy in relation to one or more specified descriptions of development (Section 5(1)) and the application would be decided under Section 104. However, there is no applicable NPS for the River Thames Scheme, therefore the application will be decided under Section 105 of the PA08. Despite this, parts of the draft NPS (dNPS) for Water Resources Infrastructure published in November 2018 and updated in August 2019 may be important and relevant to the SoS’s consideration of the project for the purposes of Section 105(2)(c) as it is considered that water resources projects are the closest projects in form to the RTS that are covered by a NPS. Notably elements of Section 3 on ‘Assessment Principles’ and Section 4 on ‘Generic Impacts’ are particularly relevant to the River Thames Scheme (RTS).
- 1.1.4 The Project Group agree with the policies relevant for the dNPS set out in Appendix M of the EIA Scoping Report.
- 1.1.5 Other matters that the SoS will consider include relevant national and local planning policy. The National Planning Policy Framework (NPPF) (MHCLG, 2021a) is relevant national policy. The NPPF sets out the UK government’s planning policies for England and how these ought to be applied. The NPPF must be considered in the preparation of local and neighbourhood plans and is a material consideration in granting development consent. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out guidance under thirteen subheadings that contribute to delivering sustainable development, as follows:
- Y Delivering a sufficient supply of homes;
  - Y Building a strong, competitive economy;
  - Y Ensuring the vitality of town centres;
  - Y Promoting healthy and safe communities;

- Y Promoting sustainable transport;
- Y Supporting high quality communications;
- Y Making effective use of land;
- Y Achieving well-designed places;
- Y Protecting Green Belt land;
- Y Meeting the challenge of climate change, flooding and coastal change;
- Y Conserving and enhancing the natural environment;
- Y Conserving and enhancing the historic environment; and
- Y Facilitating the sustainable use of minerals

1.1.6 The Project Group agree with the extensive list of policies relevant to the RTS set out in Appendix M of the EIA Scoping Report.

## 1.2 Structure of ES

1.2.1 The Project Group broadly agrees with the structure of the ES. However, at Paragraph 22.3.1.4 of the EIA Scoping Report, an indicative outline structure of the technical topic chapters is provided. The structure of the technical chapters should be revised. To understand the summary and the likely impact of a receptor, mitigation should be considered prior (embedded mitigation) and after the 'Assessment of Effects', which will determine the Residual Impact, which should also be included in the structure of the technical chapters. As cumulative effects should be included within the structure of each technical topic. Suggested format below:

- Y Introduction;
- Y Legislation and Policy;
- Y Consultation and Engagement;
- Y Assessment Methodology;
- Y Existing and Future Baseline;
- Y Key Environmental Considerations and Opportunities;

- Y Assessment of Effects;
- Y Cumulative and in combination effects
- Y Mitigation and Management
- Y Residual impacts
- Y Summary of Significance

### 1.3 Non-technical summary

Page	Reference	Comment
General		
Scoping Non-Technical Summary	iii RTS Vision	The increase in the number and size of flood events due to climate change is a concern to SBC. Future flood events will be expected to have increasingly severe environmental and health impacts if no intervention is made regarding flooding.
	v Existing Environmental Conditions	<p>Shepperton is missing from the settlements list.</p> <p>Land uses paragraph at bottom of pg. v infers that landfills are raised, this is not the case, fill has taken place around the lakes left by mineral workings and there will be fill below ground level.</p> <p>There is a location to the northeast of the lake identified in Figure 4-1 Sheet 2 as Littleton North where Middlesex County Council Committee records indicate that experimental tipping of household waste to a wet pit/lagoon may have taken place in the early 1960s.</p>

### 1.4 Project Description and Alternative Options Considered

Page	Reference	Comment
General		
22	4.1.2.2	Will the maintained water level in the channel for purposes of preventing fish death for example after a flood event, be the only means of control to prevent fish death or will oxygen level monitoring and if necessary, aeration of the channel be considered during adverse conditions? This query is raised as fish

		death can lead to foul odour, pest issues and if carcasses are left without clearance, they can become a potential public health concern particularly during hot weather.
26	4.1.2.14	Reference is made to potential re shaping of smaller lakes and to shallowing of the existing lake banks to reduce their gradients. Reference is also made to the redistribution of silts due to the operation of the RTS. What testing regime will be applied to these materials bearing in mind the flow regime may have carried contaminants from nearby landfill which could be present in silts? Will this be assessed in the source-receptor-pathway models for soils and water? There may be public access to the reshaped lake margin, for example for angling.
26	4.1.2.16	Information is given regarding the Abbey Meads Floodway, however no corresponding information is given for the Brett Aggregates land/lake on the opposite bank which is a lake that is part of the RTS and has culverts beneath the M3 through to the former Lavenders pit area referred to as Littleton South on Figure 4-1 Sheet 2.
33	4.1.4.2	Regarding bed lowering within the Thames and excavations along the channel route in an area with high ground water levels. What will happen to the waste silt and dredging arisings? Will there be any onsite dewatering on land and if so what methods of odour and silt control/mitigation will be applied for example sludge de-watering bags/membranes? The Project Group expect such measures to be secured within a Construction Environmental Management Plan (or similar).
37	4.1.5.7	The use of excavated arisings on site for constructions/ landscaping where materials is chemically and geotechnically suitable, and in accordance with the MMPs and necessary permits, is welcomed by the Project Group. Where will the geochemical parameters that are considered suitable for use be published/ secured?
45	4.2.4.1	There will be extensive re-use of site won soils – what testing will be applied to soils for which end use? Will placed soils (including any imported soils), be tested and at what frequency? How will the testing be secured?
40	4.1.9 – Environmental Mitigation	The Project Group welcomes the Applicant's commitment to embedding the Waste Hierarchy within the design of the RTS development (to minimise waste and maximise reuse) as one way of mitigating the environmental impacts of the development (paragraph 4.1.9.1). The MWPA agrees that sustainable waste management will save resources and reduce traffic and vehicle emissions which will in turn have wider economic and environmental benefits.
45	4.2.4 – Materials Management	Paragraph 4.2.4.2 of the scoping report sets out that (where possible) excavated material will be stored at materials processing sites within the DCO application project boundary and then re-used for features identified as part of the landscape and green infrastructure works. The Minerals and Waste Planning Authority (MWPA) would advise that excavated material used elsewhere as part of the RTS development should be fit for purpose, suitable and limited to the minimum volume requisite.  At paragraph 4.2.4.4 the scoping report explains that the applicant is in the process of determining the possible use of sites outside of the project boundary for EIA scoping for placement of non-hazardous material. The MWPA would welcome clarification as to what is meant by 'placement' in this context. The

		applicant should be aware that the deposit of waste on land is a material change of use of that land and that a material change of use of land requires the benefit of planning permission. Consequently, the applicant should ensure that any sites outside of the development boundary and used for the purposes of 'placing' waste benefit from a lawful use or express consent for the temporary or permanent storage of waste. The MWPA will be pleased to work with the applicant to ensure that any sites identified are suitable in this regard.
45	4.2.4.3	How will measures to prevent the cross contamination of soils be secured where potentially contaminated site won soils are stored, but may not be classed as hazardous waste?
45	4.2.5	<p>The Project Group would request that Environmental Health at the Host Authorities are consulted regarding the haul routes in order to provide information regarding areas that are sensitive in terms of air quality and noise.</p> <p>Has the alternative of routing traffic directly to the scheme construction areas via a dedicated entry/exit point from the M3 motorway in Spelthorne been considered/scoped? This would prevent some of the HGVs from contributing to poor air quality at the Sunbury Cross junction, on the Upper Halliford Bypass and along the A308. Given the scheme is so close to the M3 motorway at Shepperton and the long duration of the construction program a temporary works area with access to the motorway would allow HGVs to route directly to the scheme and then along the scheme route reducing traffic on local roads which would reduce cumulative impacts on congestion, air quality and noise. motorway.</p> <p>Areas of poor air quality in Spelthorne are strongly associated with the strategic road network and the junctions used to access that network therefore the strategy of using main thoroughfares and arterial roads to focus traffic on A roads alone will not be as effective as direct routing from the M3 to the scheme during the construction phase.</p>
47	4.2.9	<p>For noise and construction dust purposes as well as safety regarding storage of materials the compounds should not be located adjacent to residential properties, and consideration of the wind direction from which the strongest wind speeds arise and also the predominant wind direction should be given when selecting the locations. This information can be determined from Heathrow Airport meteorological data.</p> <p>Note that the use of Heras fencing with debris netting is discouraged by the Project Group as this fencing is not sufficient to prevent dust migration from storage areas and construction compounds. A solid boundary fence/site hoarding is more effective at preventing dust migration.</p> <p>The Applicant should consider the following best practice guidance:</p> <p style="padding-left: 40px;">IAQM Air Quality Monitoring in the Vicinity of Demolition and Construction Sites. IAQM &amp; EPUK Guidance on land-use planning and development control: Planning for air quality. IAQM Assessment of dust from demolition and construction 2014.</p>



48	4.3.1	<p>Has the scenario whereby surrounding land could become flooded and overtop into the channel been considered? Or will this be prevented by the design &amp; elevations. SBC raise this as the effectiveness of the sheet piling in preventing water in the channel being contaminated by soils from the surrounding land may be compromised in that scenario.</p> <p>Will there be an assessment of whether there is any increased risk of flooding to the landfills that are currently further back from the Thames, for example on Littleton Lane?</p>
51	4.3.2.9	<p>Will the annual Public Safety Risk Assessment (PSRA) review consider water chemistry, the potential for the presence of microorganisms for example blue green algae regarding areas where the public can access the water's edge and the quality of drinking water at abstraction points/supplies?</p> <p>The Project Group's Environmental Health Team's should be consulted on the PSRA.</p>
60	4.5.3.19	<p>It is noted that the route presented does not include the Littleton South Lake or Old Littleton Lane Lake, although the Littleton South Lake is linked by culvert to the Littleton North Lake. Will the impact of the scheme on the Littleton South Lake and Old Littleton Lane Lake be assessed in terms of soils, flood risk and water environment?</p>

## 1.5 Approach to EIA

Page	Reference	Comment
General		
64	5.2.1.3	<p><i>"The EIA Scoping Opinion will further inform the data gathering and survey requirements to inform the detailed assessment that will be presented within the ES."</i></p> <p>As well as the EIA Scoping Opinion, data gathering and survey requirement should also be confirmed through further engagement and consultation with the Host Authorities and other statutory bodies to support the detailed assessment of the EIA.</p>
67	5.4.1	<p>Additional guidance to consider:</p> <p>The Institute of Environmental Management &amp; Assessment (IEMA) proportionate EIA strategy and best practice (e.g. Delivering Proportionate EIA (IEMA, 2017) and the EIA Guide to Delivering Quality Development (IEMA,2016))</p>
68	5.4.3.1 (third bullet)	<p><i>"Tertiary (best practice): Actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or</i></p>

		<p><i>actions that are considered to be standard or best practices used to manage commonly occurring environmental effects.”</i></p> <p>Best Practice could be defined as the requirement for a Construction Environmental Management Plan (CEMP) or a Code of Construction Plan (CoCP). A CEMP and/or a CoCP should be defined as Primary (embedded mitigation) or Secondary (additional) mitigation. Tertiary mitigation is defined as standard sectoral practices like the Considerate Contractors Practices and would not be assessed as part of the EIA. IEMA’s Environmental Impact Assessment Guide to: Delivering Quality Development (2016)</p>
69	5.4.3.4	<p>A CEMP would not be considered as Tertiary mitigation. In accordance with IEMA’s Environmental Impact Assessment Guide to: Delivering Quality Development (2016) (statement on tertiary mitigation):</p> <p><i>“It is helpful, but not strictly necessary, to include tertiary mitigation related to construction activities, within a draft Construction Environmental Management Plan (CEMP) (or similar) included in the ES, to ensure that these actions are highlighted to the principal contractor.”</i> Such as</p> <ul style="list-style-type: none"> <li>- <i>“Applying emission controls to an industrial stack to meet the requirements of the Industrial Emissions Directive (Directive 2010/75/EU). •</i></li> <li>- <i>Considerate contractors’ practices that manage activities which have potential nuisance effects)”</i></li> </ul> <p>Standard sectoral practices that could be included in a CEMP are considered tertiary mitigation, not the CEMP itself.</p>
69	5.4.3.5	<p><i>“Primary and tertiary mitigation are considered to form part of the RTS, and therefore have been considered when determining if a project effect is likely to be significant”</i></p> <p>As part of the EIA, Primary and Secondary mitigation should be considered within the assessment, not Tertiary (see above for explanation). IEMA’s Environmental Impact Assessment Guide to: Delivering Quality Development (2016)</p>
70	5.4.3.6	<p>The examples given in the bullet point list for typically expected management plans secured through the DCO as a Requirement are a mixture of Secondary and Tertiary mitigation. This is confusing to the reader, Tertiary mitigation such as Handling of soils in accordance with good construction practice and relevant guidance (such as BS3882) would not be secured via a DCO Requirement as is industry best practice.</p>
	Summary	<p>Mitigation section – This section is generally confusing due to the incorrect use of terminology.</p> <p>As stated in IEMA’s Environmental Impact Assessment Guide to: Delivering Quality Development (2016)) - A key principle of secondary mitigation is “Best managed through an environmental management plan.”</p>

## 1.6 Air Quality

Page	Reference	Comment
General		
	General	The Project Group are concerned that construction HGVs travelling through the strategic road junctions has the potential to further impact poor air quality in the area and also cumulative impacts with other construction works and mineral extraction/landfill traffic locally. A direct access/egress from the M3 to a scheme compound would be beneficial, if possible, to reduce impacts at the strategic road junctions, where there are nearby sensitive receptors (for noise and air quality).
Data/survey		
79	6.2.1.9	In accordance with IAQM 2014 guidance for a scheme of this size, appropriate dust / PM monitoring would be required where there is a risk of dust impacts during the construction phase. It is recommended that monitoring is undertaken at least 3 months prior to construction in order to obtain a baseline for comparison. The monitoring methodology should take into account IAQM 'Guidance on Monitoring in the Vicinity of Demolition and Construction Sites' (2018).
81	6.2.2.8	If the qualitative odour assessment indicates that moderate or substantial adverse impacts on receptor locations are likely, dispersion modelling of odour impacts would be expected.
Scoping area / area of assessment		
84, 85 and 86	6.2.3.3, 6.2.3.9 and 6.2.3.12	Houseboats should be included as relevant human receptor locations when assessing construction dust, as well as construction and operational odour and road traffic impacts.
87	6.2.3.16	Roads where the RTS results in a reduction in traffic should be included within the assessment if they are within 200m of a receptor which has been included due to an increase in traffic on any adjacent roads.
87	6.2.3.18	It is agreed that the screening criteria referenced in the EPUK – IAQM guidance should be used to determine the study area.
87	6.2.3.19	In addition to European designated sites, Sites of Special Scientific Interests (SSSI), National Nature Reserves, Local Nature Reserves, Ancient Woodland and Local Wildlife Sites should also be considered in the assessment of air quality impacts on ecological receptors, in accordance with the IAQM's 'A guide to the assessment of air quality impacts on designated nature conservation sites' (2020).
Approach to Mitigation		
96	6.6.2	Best practice measures in relation to Non-Road Mobile Machinery (NRMM) should be taken into account such as:

		<p>Committing to ensuring that equipment is maintained in accordance with the manufacturer's instructions and requirements particularly regarding the use of filters to ensure emissions of air pollutants are minimised.</p> <p>Where practicable, low emission NRMM or a recent Euro engine specification should be sourced to ensure emissions are minimised.</p>
96	6.6.2.2	If contractors are being housed in local hotels and accommodation would there be an opportunity to provide low emissions minibus transport to site where hotels are situated beyond walking/cycling distance. Alternatively, accommodation could be selected near to public transport routes.
97	6.6.2.7	<p>As previously mentioned, the dust and air quality management plan should cover adequate boundary dust monitoring where there are receptors downwind of a compound or areas of excavation. The plan should cover mitigation measures during prolonged dry weather, such as during the summer months, when dust control is most challenging.</p> <p>Suitable wheel wash facilities should also be specified to reduce trackout of dust onto the highway.</p>
97	6.6.2.8	Securing a communications plan for subjects like odour, dust and spills would be advised so that there is a well-defined communications channel between the site and the community, and the site and the local authorities.
<b>Assessment Methodology</b>		
94	6.4.1	Whilst impacts from river transport emissions resulting from the RTS, such as those associated with construction material movement by use of barge, particularly during capacity improvement construction works, are unlikely to be significant, further detail should be provided in the Air Quality Chapter of ES on the number of river transport movements predicted as a result of the RTS and the class of vehicles to be used.
95	6.4.2.1	Air quality impacts on future users of green open space proposed as part of the RTS and any Habitat Creation Areas as part of the proposed plans, particularly in proximity to the M3, should be considered.
98	6.7.1.1	The IAQM 2014 guidance is accepted as appropriate as a basis for the construction dust assessment. However, should excavation and / or processing exceed 200,000 tonnes per annum (tpa), the IAQM 2016 'Guidance on the Assessment of Minerals Dust Impacts' would be more suitable.
100 / 103	6.7.1.21 / 6.7.2.2	<p>Further consultation should be undertaken with the Project Group once the traffic data forecast years and model study area are known in order to agree monitoring sites to be used for model verification, sensitive receptor locations, emission factor and background data years to be used in the assessment.</p> <p>As peak hour congestion is likely to be present in the model study area, a diurnal profile to account for changes in traffic flow weighting throughout the day will be important for producing realistic predictions and should be included in the dispersion model.</p>
101 / 103	6.7.1.23 / 6.7.2.3	The traffic data scenarios should be defined in the Air Quality ES chapter. It is considered that 2019 is accepted as being a suitable year for model verification, and adjustment purposes.

101	6.7.1.25	The latest version of the Defra emission factor toolkit at the time of the assessment should be used. Traffic congestion should be taken into account in the dispersion modelling, particularly a reduction of speeds on the approach to junctions.
101	6.7.1.26	Heathrow Airport meteorological data is considered to be suitable for use in the assessment.
101	6.7.1.27	Multi-zonal verification factors may be required to improve model performance rather than one single factor being calculated across the entire model area.
102	6.7.1.31	The EIA Scoping Report indicates that the PM <sub>2.5</sub> limit value of 20 µg/m <sup>3</sup> will be used for comparison against predicted concentrations at human receptors. Given Elmbridge Borough Council's and the Mayor of London's target to achieve annual mean PM <sub>2.5</sub> concentrations of less than 10 µg/m <sup>3</sup> across their administrative areas by 2030, an annual mean of 10 µg/m <sup>3</sup> should be used when assessing impacts on PM <sub>2.5</sub> concentrations at human receptor locations.
102	6.7.1.32	Acid deposition and concentrations of ammonia resulting from road traffic emissions and their contribution to nitrogen deposition should also be considered in relation to impacts on ecological receptors.

## 1.7 Biodiversity

Page	Reference	Comment
General		
		As mentioned in the Scoping Report, the project presents an opportunity to deliver net gains in biodiversity. It is advised that the Applicant differentiates clearly in the ES between design elements/mitigation required to mitigate significant effects to biodiversity receptors, and those required to deliver net gains in biodiversity.
Data/survey		
112	7.3.1.34	The ES should clearly state where species are listed Species of Principal Importance in England.
117-118	7.3.1.9	When discussing species which habitats support, the ES should include reference to relevant sections rather than stating further detail is provided below.
123	7.3.1.38	There are a few inconsistencies with the use of scientific names and common names. Some sections only reference common names others have both scientific names and common names. The ES should provide a standardised approach.
124	7.3.1.41	Within the ES, the desk study findings should be drawn out and some commentary on whether these were confirmed in the field. Or include number identified through desk study and then in subsequent field surveys
124	7.3.1.42	Reference to top mouth gudgeon but no other invasive non-native species (INNS) fish such as zander. The ES should confirm if other fish INNS were recorded or are absent.

125	7.3.2	The Future Baseline used to inform the ES should take into account changes brought about through climate change.
Scoping area / area of assessment		
115	7.2.3.2	The study area for habitats and flora currently includes the area within the project boundary. It is recommended that this is extended to include all habitats which may be subject to effects from the Project, including those outside the boundary.
128	7.4.1	The ES should include a detailed assessment of potential effects to sensitive species (including Special Protection Area (SPA) birds)) from noise, vibration, lighting and visual disturbance during the construction phase. This may need to include baseline monitoring and modelling of noise and vibration levels in locations where sensitive receptors, such as SPA birds, are found.
128 129	7.4.1 7.4.2	The ES should include all potential construction and operational effects to aquatic fauna such as isolation of fish during construction activities, or alterations to navigational channels.
129	7.4.2	The ES should include a detailed assessment of potential effect to sensitive species (including SPA birds) from recreational disturbance from new users of public spaces during the operational phase.
128 129	7.4.1 7.4.2	The EIA scoping report acknowledges the value of Open Mosaic Habitat (OMH) present within the site in a number of locations, including Manor Farm. The ES should fully assess potential effects to OMH from both construction effects such as habitat loss, and through operational effects such as recreation and dog walking.
Scoped in/out topics		
132	7.4.3.2	Mole Gap to Reigate Special Area of Conservation (SAC) is mentioned in Section 7.3. If this SAC is not taken forward to assessment stage the ES should present full justification for this.
132	7.4.3.2	Fish (certain species) listed but eels listed separately. The ES should clearly state which fish will be included within the assessment.
133	7.4.3.4	It is agreed that none of the biodiversity features should be scoped out from the EIA.
133	7.5.11	Given secondary mitigation measures are required to ensure potential effects from transportation of INNS and pollution from stored chemicals or fuel are avoided, these potential effects should be scoped into the EIA.
134	7.5.2.1 (3 <sup>rd</sup> bullet)	Where mitigation measures are required to avoid/minimize operational effects to designated sites, to a level where they would be not significant, this should be fully assessed and captured within the ES.
Mitigation		
135	7.6	Mitigation measures should follow the overarching principles of the Mitigation Hierarchy
135	7.6	The design of green and blue infrastructure including Habitat Creation Areas should be undertaken in full consultation with Host Authorities (including the Project Group), Natural England, Environment Agency, and other consultees.

135	7.6	Mitigation required to avoid significant effects to European sites or qualify species, should be informed by the requirements of the Habitats Regulation Assessment (HRS).
135	7.6	Timing restrictions for works in proximity to watercourses should be discussed and agreed with the EA.
135	7.6.3	Mitigation to offset potential operational effects may need to include strategic measures to mitigate effects to designated sites or qualifying features from likely increased recreational activities as a result of the RTS.
135	7.6.2	Where protected species will be affected, details of mitigation requirements should be provided, along with the mechanism to secure licenses where required. The Applicant may wish to produce draft protect species license applications and agree these with Natural England.
135	7.6.2	Measures to remove fish from working areas in rivers and other waterbodies to be considered as part of the assessment and appropriate licenses and/or mitigation sought.
135 138	7.6.2.1 7.6.3.1	There is potential to facilitate the migration of aquatic INNS which are present in the local stretch of the Thames into the proposed lakes along the RTS through Spelthorne, particularly as each lake is designated a Site of Nature Conservation Importance. Paragraph 7.4.2.1 states the potential benefits to fish and mobile aquatic species through the creation of fish passages, but these same mechanisms will enable undesirable species to transit too. <i>Crassula helmsii</i> and Himalayan Balsam are frequent in the area and will require strong control measures to prevent them spreading along new corridors or swamping habitat features created as part of the RTS. It appears the Applicant is consulting with the EA on an INNS management plan and that secondary mitigation for INNS is mentioned in Paragraph 7.6.2.1 and 7.6.3.1. It is expected that this is to be robust to prevent changes to the lake ecosystems which may stop the lakes being used by the overwintering birds for which the SNCIs are primarily valued.
Assessment Methodology		
139	7.7.1.6	The scope of the HRA should be agreed with Natural England. It is suggested this could be done through an HRA Evidence Plan (see <i>Advice Note 11 - Annex H Evidence Plans for Habitats Regulations Assessments of Nationally Significant Infrastructure Projects</i> (The Planning Inspectorate, 2017))
138	7.7	This section suggests that the CIEEM EclA methodology will be used alongside the assessment methodology used in the wider ES. If this approach is taken, it is recommended that the assessment presents the conclusions from both, stating whether effects are significant or not significant at the relevant geographical level of importance.
138	7.7	The ES should include details of all relevant planning policy against which the application will be assessed.

## 1.8 Climatic Factors

Page	Reference	Comment
Data Sources		
148	8.2.1.3	The ES should set out the emission factor data used in the assessment and set out why those selected are appropriate for use in the EIA.
148	8.2.1.3	Any assumptions made on activity data, material and on-site activities should be clearly stated in the ES. There is no mention of sourcing construction and operation transport data or the study area for the affected road network. This should be obtained from the transport model for the affected road network.
149	8.2.1.5	This section does not confirm the source of the future climate projections that are referred to, however it is noted that later on in the EIA Scoping Report reference is made to the Met Office UKCP18 projections. Clarification is required.
Baseline		
150	8.2.3.1	This paragraph states that during operation, changes in trip generation for roads in the local area will not be significant to require additional assessment for greenhouse gases (GHGs). This should be confirmed through review of traffic data at PEIR and ES stage before this can be scoped out of further assessment.
151	8.3.1.1.	It's not clear how 'material emissions' has or will be defined. This is key to understanding the scope of the GHG assessment.
152	8.3.1.6	The assessment should consider relevant publications, including more recent information published by the Met Office than the 2016 climate profile of Southern England alone, to aid in establishing a more up to date baseline.
152	8.3.2.2 – 8.3.2.5	It's agreed that RCP8.5 is an appropriate emissions scenario and this should be used to establish the future baseline. No other information is provided on the UKCP18 data that will be used to establish the future baseline. The ES should clearly set out the model selected (e.g. probabilistic 25km, regional 12km or local 2.2km) and provide the rationale for this. The assessment should be based on the 50th percentile and account for the uncertainties that exist around climate projections. Lifecycle stages should be assessed in the short, medium, and long term (i.e., 2030s, 2050s and 2080s). The climatic baseline should consider extremes in short-term weather events, such as heatwaves; long-term climatic variability, such as seasonal changes in precipitation; and average climate norms, such as ambient temperature.
Effects scoped in / out		
156	8.5.1.1	It is not clear what has been scoped out for construction phase GHG effects. Some movement of plant and materials appears to be scoped out with little evidence as to why. Further justification should be provided
Mitigation		



157	8.6.2.3	The mitigation is welcomed, although it's noted that no primary mitigation has been identified. Other opportunities for mitigation should be explored, for example, the use of floating photovoltaics. Further information of mitigation and how it will be secured should be set out in the ES.
Methodology		
159	8.7.1.3	The ES should set out the inventory of GHG emissions for each life cycle stage, as defined in PAS 2080.
159	8.7.1.4	It's difficult to understand the full scope of assessment without further information on the emissions that are to be excluded. Further engagement is required on this topic. In line with IEMA guidance and PAS 2080, emissions should only be excluded where expected emissions are less than 1% of total emissions and where all such exclusions total a maximum of 5% of total emissions; all exclusions should be clearly stated.
159	8.7.1.3	There is no reference to the life span of the project within the Climate Change Mitigation assessment methodology and, while it's noted that the project is anticipated to have a long term design life, the assessment should consider the net impact of GHGs over its life time. This may be done by selecting an appropriate time frame of, for example, 60 years. It is unclear how the GHGs for the scheme will be assessed against the future baseline set out in section 8.3. The ES should clearly set out the assessment scenarios, temporal boundaries and how the scheme's emissions may be projected forward to a future year.
160-161	8.7.1.8-8.7.1.12	The methodology for determining significance in this chapter is very unclear and sets out two contradictory approaches. The PEIR should confirm the approach to be adopted in the ES along with the rationale for this.
162	8.7.2.1	It is not clear if the construction stage is being scoped out of further assessment in the Climate Change Adaptation assessment. It is not scoped out in section 8.5, however there are several references to " <i>not envisioning climate will have any effect on the project during the construction phase</i> ". No justification is given to support this statement. If the construction stage is being proposed to be scoped out, further justification is required given that there is an abundance of evidence that climate change is having impacts already and the construction period will go into the next decade.
162	8.7.2.2 – 8.7.2.4	No information is provided on how significance will be determined, or how the risk-based approach will be undertaken. This makes it difficult to comment if the methodology is appropriate. The PEIR and ES should clearly set out how this has been done.

## 1.9 Cultural Heritage, Archaeology and Built Heritage

Page	Reference	Comment
General		
166-206	General - Cultural	There are concerns regarding monitoring potential hydrological changes caused by the RTS and how these might impact the designated archaeological sites in particular. It is noted that there is not a lot in the

	Heritage Overview	<p>EIA Scoping Report about the location and nature of the proposed Habitat Creation Areas in relation to cultural heritage. It is assumed that Habitat Creation Areas are still at an early stage and that there will be more discussion, therefore, further engagement will be required.</p> <p>The County Council's Historic Environment Planning Team look forward to archaeological prospection works continuing within the study areas to inform the EIA and any required mitigation.</p>
166-206	General – Archaeology	<p>The RTS runs through a landscape which previous investigations have demonstrated has a high potential to contain significant archaeological and paleoenvironmental deposits, particularly from the prehistoric and medieval periods. This archaeological sensitivity is acknowledged by the decision to scope in archaeology within the EIA.</p> <p>The EIA Scoping Report contains a chapter on Cultural Heritage, Archaeology and Built Heritage that identifies that the RTS will have an impact on potentially sensitive and significant archaeological deposits and sets out a summary of the baseline work carried out to date by York Archaeology as well as identifying appropriate methods of further investigations and mitigation works that will be taken forward in the EIA.</p> <p>A comprehensive suite of investigations has been carried out since 2016 including desk based research, geophysical and LIDAR survey and geoarchaeological and archaeological evaluation. This work has produced a good understanding of the likely impact of the proposals on below ground deposits and enabled areas of particular sensitivity to be identified and evaluation strategies designed accordingly. Some areas have not been subject to physical investigation due to logistical reasons and some further work remains to be carried out but we can confirm that the work undertaken so far, together with the approach set out in the EIA Scoping Report confirms best practice and will allow all significant effects that the development will have on cultural heritage to be identified and allow appropriate measures to be put in place to mitigate any adverse impact on the archaeological resource.</p>
166-206	General – Built Heritage	<p>It is noted that the Applicant is intending to scope in the impact on built heritage as part of this scheme. In paragraph 9.4.1.1 (p.194) the Applicant makes clear they will consider the impact on the setting of heritage assets as part of construction effects. In paragraph 9.4.2.1 (p.196) the Applicant states they will consider the impact on the setting of heritage assets as part of operational effects. As there is no direct impact on built heritage assets as part of this scheme the County Council's Historic Buildings Officer is content that this will be sufficient to allow the scheme to be properly assessed.</p> <p>It is agreed that the impact of general maintenance activities, or the removal of non-hazardous materials (not including construction traffic) is scoped out of the EIA as outlined in Paragraph 9.5.1.</p>

## 1.10 Flood Risk

Page	Reference	Comment
General		
207-235	General	The Applicant should be made aware of the following: Where proposed works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.
210	10.2.2.4	A Flood Risk Assessment (FRA) will be produced to comprehensively assess flood risk and would form an appendix to the ES
48	4.3.1.2	It is noted that a peak flow value of 150m <sup>3</sup> /s has been stated as a design value for the new channel. It is not clear what return period is the scheme being designed to / protect against (if applicable)?
212	10.2.2.13	Level for level floodplain compensation should be provided for any loss of floodplain storage capacity.
211	10.2.2.11	Evidence should be provided within the FRA that the components of the RTS are located in appropriately compatible Flood Zones as per PPG Table 2.
223	10.4.2.1	Will the FRA include analysis of sensitivity testing of structures (i.e. blockage scenarios of any new bridge crossings/culverts etc)? Will changes in channel capacity due to sedimentation (possibly due to changes in velocity of the water and altering the channel capacity) also be included in the sensitivity testing?
		How will the Flood Zones be defined? (i.e. as the definition ignores the presence of formal defences, will the baseline flood zones remain as the pre-construction scenario or will a new baseline be defined post construction e.g. based on a reduced scheme operation?
214	10.3.1.4	It is noted that the EA are considering the updated definition of Flood Zone 3b Functional Floodplain of the 1 in 30 annual probability flood event (rather than 1 in 20). It is assumed this change would only formally take place once the revisions have passed through local planning policy documents (i.e. SFRA).
Data/survey		
208	10.2.1.2 - 10.2.1.3	Lower Thames 1D-2D Flood Mapping Model (EA, 2019) is to be used as a basis for the assessment, locally refined and run for the baseline and post-development scenario. Important to consider if any phases of construction will result in constraint to flow/potential detrimental impact
234	10.8.2.1	It is noted that the post development will be subject to an independent review in-line with the EA's standard review process.

Scoping area / area of assessment		
212	10.2.3.1	The study area is stated as the 'upstream and downstream boundaries of the 1 in 100 annual probability floodplain to be affected by the project' as defined in Figure 10.1. This should include climate change impacts
Baseline		
213	10.3.1.5	Will this connectivity be considered in terms of the mobility of contaminants? The Littleton South Lake is situated to the south of the connected to the north lake by a culvert under the M3 for example, so although not part of the scheme water can flow between the two lakes.

## 1.11 Health

Page	Reference	Comment
General		
n/a	n/a	The comments provided within this review do not include comments on air quality, noise, and other environmental health hazards, as these have been covered by the comments provided elsewhere in this EIA Scoping Response.
Data/survey		
236	11.2.1.1	The EIA Scoping Report identifies the baseline year to be used in the assessment as 2021. There were pandemic restrictions throughout this year, and the Applicant should consider if there any associated implications with using 2021 as opposed to 2019 or 2022 without such restrictions as a base year, for example activity levels may have varied due to workplace restrictions and disruptions to commuting etc. Due to the reductions in air pollution associated with decreased traffic flows in 2021 the health data for asthma, heart attacks and other air pollutant linked health conditions may not reflect a more normal traffic flow year. This should be noted in limitations where relevant.
239	11.2.2.9	Engagement list does not include Local Authority Environmental Health Departments but rather is through the County Public Health Team. In order to reach specialists in air quality and noise it would be prudent to also consult the Senior Environmental Health Managers for the Project Group
239	11.2.2.9	In addition to understanding the baseline characteristics, engagement with local authority public health officers should include discussion of local health priorities and how the Scheme can support these. The Applicant should seek the public health officer's local knowledge of vulnerable groups, to be considered in the assessment.
242	11.3.1	The health baseline should include data that is relevant to the potential impacts of the RTS, where available. For example, in Paragraph 11.4.1.1 the Applicant identifies a potential impact during construction to be temporary adverse effects on air quality. The baseline studies should therefore identify the percentage of the community with respiratory diseases/ chronic obstructive pulmonary

		disease and deaths from respiratory disease. This data is available from the Office for Health Improvement & Disparities health profiles, Fingertips public health data, and National General Practice Profiles. In Paragraph 11.4.2.1 the Applicant identifies that the RTS could provide a beneficial effect by encouraging more outdoor recreation. The baseline should therefore set out the current activity levels of the population in the Study Area, for example using Sports England Active Lives data tables. The assessment should then identify how the RTS could influence this baseline.
256	11.7.1.5	Through the baseline studies, key vulnerable groups should be identified who may be disproportionately affected by the RTS. The Wales Health Impact Assessment Support Unit (WHIASU) provides a list of potential vulnerable groups that should be reviewed to ensure all potential groups are captured. Consideration should be given to relevant vulnerable groups in the assessment and during consultation, and any specific mitigation to reduce impacts on vulnerable groups should be identified.
<b>Scoping area / area of assessment</b>		
240	11.2.3	As noted in Paragraph 11.3.1.4 and within the limitations section, geographies do not always align with health datasets required to complete the health baseline. There are instances where ward level data is not always available for relevant health determinant data. It is advised that the Applicant use the Middle Super Output Area (MSOA) level data, as health data is aggregated at this level. This would allow for more direct comparisons between datasets. Furthermore, MSOA level data are more stable over time compared to wards.
<b>Scoped in/out topics</b>		
249	11.4	The EIA Scoping Report identifies potential creation of jobs and training opportunities. The assessment should set out how the Applicant will prioritise local job creation in the first instance and how this can be secured e.g. preparation of an Employment and Skills Plan. This should include consideration for apprentice provision.
252	11.5.1.1	The transport of hazardous materials is scoped out, yet this will generate emissions to air from the HGV vehicle exhausts, so should be scoped in with regards to air quality. The vehicles will also contribute to noise levels. Permits covering the processing and treatment of materials are unlikely to consider the impacts of the vehicles transporting the material on local air quality and noise so health impacts could be missed regarding the associated vehicles.
253	11.5.2.1	The EIA Scoping Report notes potential adverse effects from light pollution and states that this potential effect will be 'designed out'. Consideration should be given to the role that lighting may provide in reducing crime/ fear of crime, especially in areas of the RTS which may not benefit from natural surveillance. The lighting and open space design should be considered with the principles set out in the Secured by Design initiative and included with the Design Principle or Design and Access Statement (or similar) with the DCO application. This could also be raised during consultation with the local police force, which the Applicant has stated they will do in Paragraph 11.2.2.9.

255	11.6.2.1	Will there be a dedicated scheme ground gas risk assessment to secure appropriate monitoring and mitigation concerning ground gas migration?
255	11.6.3.1	Consideration should be given to how vulnerable groups will be considered within the consequent stages of the RTS's design and consultation. For example, shading and suitable paving along active travel routes, and provision of benches and a range of seating areas will help to ensure the elderly, pregnant women and those with pre-existing health conditions can benefit from the RTS, these provisions should be included in any future consultations/engagement. The mitigation section of the ES should set out how these elements will be considered and secured during the detailed design phases.
256	11.7.1.4	The magnitude of effect should also consider whether any vulnerable groups are likely to be affected by the impact, and whether the impact is linked to a local public health priority/ objective. The scientific literature/ strength of evidence base linking the aspect of the RTS to health outcomes should also be considered. The Human health: ensuring a high level of protection (International Association of Impact Assessment, 2020) paper sets out how contextual considerations should support a robust reasoned conclusion on significance.
257	11.7.1.5	The EIA Scoping Report states that an Equalities Impact Assessment (EQiA) will be undertaken. The purpose of the EQiA is to ensure the RTS promotes equality and does not discriminate against people with any of the nine protected characteristics as set out in the Equality Act 2010. It is advised that the EQiA should be prepared at the earliest stages of the design development so that the design can be modified should any impacts on protected characteristic groups be identified.
258	11.7.2	The Applicant has referenced the Healthy Urban Development Unit (HUDU) rapid HIA toolkit (2019) within Chapter 23 References, however it's not clear how the toolkit will be utilised in the health assessment. The toolkit can help identify determinants of health likely influenced by the RTS. Given the scale of the RTS, the HUDU Healthy Urban Planning Checklist (2017) may provide a more comprehensive analysis of all potential health and wellbeing impacts. The Applicant should review the Checklist to ensure all potential health and wellbeing impacts are captured. The methodology should clearly set out which determinants of health have been scoped into the assessment and why, and those that have been scoped out, and why.
259	11.8.1.1	As noted above, a key limitation is that the impacts of the covid-19 pandemic are still emerging and may not be reflected in the health baseline, especially if the only data available for some health determinants is prior to 2020. This should be acknowledged where relevant in the limitations and baseline. The covid-19 pandemic has also highlighted the need for local, high quality green open space. Impacts of the covid-19 pandemic should be considered in the assessment where relevant.

## 1.12 Landscape and Visual Amenity

Page	Reference	Comment
General		
261-295	General	<p>The Project Group is broadly content with the proposed scope, baseline information and methodology for the Landscape Visual Impact Assessment, although it is noted that the scheme design development is ongoing and further consultation will take place, including as part of the PEIR. The further design development will include the landscape (including new landforms) and biodiversity design elements. Once the scheme design is fixed a finalised Zone of Theoretical Visibility (ZTV) will need to be produced and the study area for the LVIA confirmed. Viewpoints will also need to be finalised and confirmed with the Host Authorities and further consultation will be required to enable appropriate technical input to this process.</p> <p>Commentary within Chapter 12 states that the effects of lighting will be considered within the LVIA which is welcome. Lighting should be assessed within the landscape and visual effects assessments and consideration should be given to the need for night-time viewpoint photography, particularly for key sensitive receptors / key representative viewpoints.</p> <p>With regard to proposed viewpoint photography and visualisations, Paragraph 12.7.1.4 states that where possible, photography will be undertaken in both summer and winter months. This is welcome, however for the avoidance of doubt, the Project Group would expect that for a scheme of this significance, as a minimum winter photography for all agreed viewpoints should be undertaken to demonstrate the worst-case scenario. It is also stated that visualisations will illustrate the project at Year 1 and Year 15. Consideration should be given to producing visualisations for any predicted significant construction effects, for example, in relation to large construction compounds and infrastructure including tall plant, as the construction phase is likely to be present in the landscape and within views for a significant period of time. Baseline photography and visualisations should accord with Landscape Institute Technical Guidance Note 06/19 – Visual representation of development proposals. For a scheme of this significance Type 4 visualisations are likely to be the most appropriate.</p>
	General	Engagement between the Applicant and Project Group required on the potential impact of the route on tree preservation orders (TPO's), particularly around Ferris Meadows (Spelthorne).

## 1.13 Materials and Waste

Page	Reference	Comment
General		

296-329	General	<p>The Project Group agrees that the proposed scope of the EIA should include the topics of materials and waste (Chapter 13). These matters are particularly relevant to the remit of the Minerals &amp; Waste Planning Authority (MWPA) which includes ensuring a steady and adequate supply of minerals and the provision of sufficient facilities to manage Surrey's waste.</p> <p>It is noted (Paragraph 4.2.1.1 of the EIA Scoping Report) that enabling works relating to the RTS are proposed to commence in mid-2026 and construction should be completed by early-2032 (some 6-years).</p>
Policy Framework		
296-329	Policy Framework	<p>Key policy documents that will need to be considered in relation to materials and waste</p> <ul style="list-style-type: none"> <li>• Surrey Waste Local Plan 2019 – 2033</li> <li>• Surrey Minerals Plan Core Strategy 2011 – 2026</li> <li>• Surrey Minerals Plan Primary Aggregates DPD 2011 - 2026</li> <li>• Surrey Minerals Plan Site Restoration SPD 2011 – 2026</li> <li>• Surrey Aggregates Recycling Joint DPD 2013 - 2026.</li> </ul> <p>Appropriate considerations should be given to emerging minerals and waste policy during the DCO process.</p> <p>Notwithstanding the above, the MWPA is preparing the county's first joint minerals and waste local plan which will seek to provide for a minerals and waste development framework for a period of 15-years (2024 to 2039). To this end a Reg18 Issues and Options public consultation was undertaken between November 2021 and March 2022, and the MWPA is presently preparing the associated Reg 18 Preferred Options public consultation which is set to take place in June 2023. Further public consultations and an examination in public will be held before the Minerals and Waste Local Plan (MWLP) is adopted by SCC at the end of 2024. Upon adoption the MWLP will supersede the existing DPDs and SPD listed in Appendix M.</p>
Stakeholder Engagement		
297-300	13.2.2 – Stakeholder Engagement	<p>It is noted at Paragraph 13.2.2.3 of the EIA Scoping Report that the materials management feasibility study and Materials Management Strategy (MMS) that are being developed in parallel to the DCO process and that these initiatives will provide further clarity on the waste management proposals and waste streams relating to the development including the exact quantity and types of material to arise from the proposal and how any surplus will be utilised. It is also noted (Paragraph 3.2.2.9) that consultation with Environment Agency's contaminated land and waste technical specialists and its National Permitting Service regarding material re-use, effects to landfills and waste recovery permits and applications is ongoing; and that, in consultation with the Environment Agency, a 'Contamination and Waste' advisory group will be formed to guide the project design and the MMS.</p>



		The Applicant's commitment (Paragraph 13.2.2.11) to additional engagement with stakeholders prior to the submission of the DCO, in order to fully understand baseline characteristics, significance of effect and potential approaches to mitigation and management for materials and waste, and the consenting approach is welcomed.
<b>Study Area</b>		
300-301	13.2.3 – Study Area	The approach set out in relation to the study area (Paragraphs 13.2.3.1 and 13.2.3.2) for the purposes of waste management and primary materials and waste is agreed.
<b>Permitted Landfill Site in Surrey</b>		
309-310	Table 13-2 – Permitted Landfill Sites in Surrey	It should be noted that Harlington Gravel Pit is not within the administrative boundary of Surrey or Spelthorne, it is located within the London Borough of Hillingdon.
299	13.2.2.6	The proposed landscape beacons will require suitable validation testing by an appropriately qualified person in accordance with the LCRM regime, to ensure that placed soils are geochemically suitable for the end land use and do not present a health hazard to the public using the facilities and landscapes provided by the scheme and necessary permits sought.
300	13.2.2.10	Has information from the Esso Southampton to London Pipeline scheme which was required to undertake ground investigations, within the RTS Application Boundary, under the granted DCO, been incorporated where relevant (including regarding the Soils chapter)?
<b>Key Environmental Considerations and Opportunities</b>		
314	13.3.3 – Key Environmental Considerations & Opportunities	The environmental considerations and opportunities in relation to materials and waste as set out in Paragraphs 13.3.3.1 and 13.3.3.2 are agreed.
<b>Construction Effects</b>		
314-315	13.4.1 – Construction Effects	The likely significant effects arising from construction as set out in Paragraph 13.4.1.1 are agreed. However, Paragraph 13.4.1.2 appears to require further consideration. The proposed route of the RTS development appears to (largely) pass through previously worked and infilled land and is therefore likely to have limited potential as an incidental source of primary material (windfall over and above mineral resources within Preferred Areas for mineral extraction as set out in the Surrey Minerals Primary Aggregates DPD). Where minerals have been previously worked, the relevant land should also be restored or otherwise reclaimed. In this regard it is more likely that the RTS would enhance or compliment previous restoration/reclamation efforts as opposed to contributing to the reclamation of historic landfills. Nevertheless, it is not clear how the excavation of closed landfills and removal of previously deposited waste (thereby reducing the volume of landfill material) would provide for significant

		<p>beneficial effects in and of itself. A large proportion of historic landfill material (particularly hazardous waste, contaminated waste, local authority collected waste, and commercial and industrial waste) is unlikely to be suitable for recycling or recovery and so would need to be re-disposed of either at an operational landfill elsewhere or through thermal treatment.</p> <p>Any incidental excavation of minerals to facilitate the RTS is unlikely to have adverse effects on the MWPA as a local planning authority. It is more likely to influence the local market for primary minerals (sharp sand and gravel) in the context of supply and demand. However, given the limited potential for mineral extraction this influence is not likely to be material. In this respect, unless windfall material is discarded, it is likely that incidental extraction of minerals from areas outside Preferred Areas for mineral extraction (as set out in the Surrey Minerals Plan Primary Aggregates DPD) will have a neutral/positive effect in that it would substitute for minerals that would otherwise have been extracted elsewhere and transported to and used as part of the RTS.</p>
Operational Effects		
315-316	13.4.2 – Operational Effects	<p>In relation to Mineral Safeguarding Areas (MSA) and the likely significant operational effects detailed in Paragraph 13.4.2.1, different land uses are classified according to their flood risk vulnerability as per Table 2 of the Planning Practice Guidance (Paragraph: 079 Reference ID: 7-079-20220825) with development classified as: essential infrastructure; highly vulnerable; more vulnerable; less vulnerable; and water compatible. Sand and gravel working is classified as a 'water compatible' use of land as per Annex 3 of the National Planning Policy Framework 2021. As a water compatible land use, sand and gravel working is considered appropriate in all Flood Zones subject to, at application stage, a site-specific flood risk assessment for development proposals in Flood Zones 2 and 3. Consequently, although the scope for mineral extraction may be reduced (by virtue of standoffs, severance, or access for example), the existence of flood channels in themselves is unlikely to prevent future working of minerals within these areas. In respect of other project components that arise from the RTS, future mineral development within MSAs could compliment or enhance such features through carefully designed restoration and long-term management schemes particularly where a landscape based approach is adopted.</p>
Effects not requiring Assessment		
316-317	13.5 – Effects not requiring Assessment	<p>It is agreed the construction and operational effects as set out in Paragraphs 13.5.1.1 and 13.5.2. do not require an assessment</p>
Approach to Mitigation		
317-318	13.6 – Approach to Mitigation	<p>In respect of mitigation, the Applicant's commitment to embedding the Waste Hierarchy within the design of the RTS development as one way of mitigating the environmental impacts of the development (Paragraph 4.1.9.1) should be considered a primary mitigation measure. The secondary mitigation measures under consideration for the construction phase of the RTS development (Paragraph 13.6.2.1)</p>

		are agreed. However, emphasis should be placed on waste prevention over reuse, recycling, and recovery.
317-318	13.6.2.1	Please explain how verification will be secured. Presumably through the MMP, which will be secured as a DCO Requirement?
Significance Criteria		
318-325	13.7.1 – Significance Criteria	The significance criteria set out in Paragraphs 13.7.1.1 to 13.7.1.19 is agreed.
Assessment of Effects		
326-328	13.7.2 – Assessment of Effects	In respect of the assessment of effects, receptors listed at Paragraph 13.7.2.2 should, in addition to Minerals Safeguarding Areas, include existing mineral infrastructure, Preferred Areas for mineral extraction and Areas of Search as identified in the Surrey Minerals Plan Primary Aggregates DPD and emerging planning policy. Approved restoration scheme requirements for mineral workings should also be given consideration in the context of the supply and availability of suitable restoration material. Otherwise, the operational and construction effects set out in Paragraphs 13.7.3.1 to 13.7.5.2 are agreed.
238	13.7.5.1	Note that any hub site attracting traffic to retrieve materials to be used on other sites, should be subject to an air quality assessment to account for the additional traffic.
329	13.8.1.9	Where will the scope of the waste classification testing be secured?  Will testing include geochemical testing to determine whether materials are suitable for the land end use where they will be re-used?
491-495	General	The MWPA can confirm that it has been previously engaged in advising the RTS with respect to EIA scoping and through the provision of pre-application advice. The MWPA will continue to engage and work with the applicant as the scheme progresses through the DCO process.
68-72	5.4.3 - Approach to Mitigation	The Project Group welcomes the Applicant's commitment (paragraph 5.4.3.6 of the scoping report) to the preparation of a Site Waste Management Plan (SWMP) as part of a MMS. This plan should seek to demonstrate how waste will be minimised and recycling and recovery of waste that does arise from the RTS development will be maximised (on or off-site). The SWMP should be prepared as a living document and be in place before any enabling works relating to the development commence.

## 1.14 Noise and Vibration

Page	Reference	Comment
Data/survey		
345	14.2.1.10	The results of the noise survey are included in a separate noise survey report, although this report has not been provided at this stage and therefore no comments with respect to measurements undertaken to-date are provided.
Scoping area / area of assessment		
348	14.3.1.1	<p>The classification of temporary accommodation receptors (including traveller sites and houseboats, if any exist within the study area as non-residential should be justified within the ES, if they are considered to be non-residential. Parks/outdoor amenity areas are not included within the list. Any existing or proposed parks/outdoor amenity areas within the study area should also be outlined within the PEIR and assessed within the ES.</p> <p>The ES should include a detailed assessment of potential effects to sensitive species (including SPA birds) from noise and vibration. This may need to include baseline monitoring and modelling of noise and vibration levels in locations where sensitive receptors, such as SPA birds, are found.</p>
Scoped in/out topics		
346	14.2.2.2	An indication of duration of exposure to construction noise and vibration should also be considered within the ES and considered within the assessment of significance. The assessment methodology should be confirmed within the PEIR and an indication of working hours provided for the construction methodology.
351	14.3.3.1	If outdoor amenity areas are proposed, there is an opportunity to provide outdoor amenity areas with suitable noise levels. The suitability of outdoor amenity space and suitability of footpaths should have consideration for noise levels experienced in these areas. The assessment should be outlined within the PEIR and the assessment should be provided within the ES.
352	14.5.2.1	Operational noise effects on and the suitability of new green spaces should be considered in terms of impact on human receptors and wildlife receptors. The assessment should be outlined within the PEIR and assessed within the ES.
352	14.5.2.1	Noise generating activities on new green spaces should be considered within the ES. Their anticipated use types should be considered and assessed for their suitability with respect to noise generation.
356	14.7.3.1	Noise impacts arising from the use of construction compounds and any haul routes as part of the construction work should be assessed within the ES.

356	14.7.3.1	Noise impact arising from potential noise and vibration works at night should be assessed within the ES.
356	14.7.3.4	The duration of exposure, required to consider effects to be significant, is not provided. The assessment of significant effects should be outlined within the PEIR and assessed in the ES.
360	14.7.3.14	This paragraph states that both the do minimum and do something scenarios include growth and committed development traffic, whereas Paragraph 14.3.2.1 advises that the baseline will be used without committed development traffic (to ensure a worst-case assessment). Best practice would be to include growth and committed development traffic within the assessment. The approach should be confirmed within the PEIR/ES as these paragraphs appear to conflict.
360	14.7.3.14	It is not confirmed which construction year is being assessed. The assessment within the ES should consider and assess impacts during the peak construction year, as a minimum.
360	Table 14-5	Any change in the resultant Leq,16hour, for roads with traffic flows below 1000 should also be considered within the ES.
361	14.7.3.16	Based on this paragraph, vibration from offsite construction traffic is to be assessed by reviewing road conditions and distances to receptors. The assessment should be presented within the ES.  The impact of vibration and underwater noise on the impact on aquatic wildlife should be assessed within the ES.
361	14.7.4.1	DMRB LA 111 paragraph 3.51 advises that the following scenarios should be assessed:  "1) Short term: DMOY compared against the DSOY; 2) Long-term: DMOY compared against the <i>DSFY</i> ; 3) <i>Non-project noise change: do-minimum future year (DMFY) compared against the DMOY.</i> "  Based on guidance within DMRB LA 111, effects should be assessed due to the change between the opening year do minimum and future year do something, rather than the future year do minimum and do something, which the scoping report proposes. The assessment of significance should also consider guidance within Table 3.60 of DMRB LA111.  The assessment should consider the proposed LOAEL and SOAEL values for traffic noise presented within DMRB LA 111.
361	Table 14-6	Any change in the resultant Leq,16hour, for roads with traffic flows below 1000 should also be considered within the ES.
362	14.7.4.6	The uses of the new green open spaces should be identified and confirmed in the ES to ensure the activities are appropriate for the local areas.

		An assessment of noise impact from use of the flood alleviation channels, including the flow of water, should be considered where appropriate.
--	--	--

## 1.15 Socio-economic

Page	Reference	Comment
General		
352	15.1	It is acknowledged that a separate Economic Appraisal, Equality Impact Assessment and Natural Capital Assessment is being prepared to accompany the DCO application. The Socio-Economic chapter should cross-reference these documents and their findings, where appropriate.
354	15.2.2.2	Despite Surrey County Council requesting a standalone socio-economic technical report (in 2019) rather than part of the EIA process, it is acknowledged that the previously proposed Population Chapter has been split and a separate Socio-Economic chapter and Health Chapter is now proposed as part of the PEIR/ES. The proposed approach is supported and allows for each chapter to specifically address the relevant issues.
374	15.7	The EIA Scoping Report does not specify whether the assessment of socio-economic effects will be quantitative or qualitative. Where possible, the assessment should be quantitative, for example stating how many jobs will be created, how much Gross Value Added (GVA) will be created etc., rather than just qualitatively stating it will support economic growth.
Data/survey		
353	15.2.1.1	2011 Census data is cited as being one of the data sources used to inform the socio-economic baseline. The Socio-Economic assessment in the PEIR/ES should ensure that the 2021 Census data is used, if published and available at the time of writing.
356	15.3	Need to ensure that the source of all baseline data is referenced accordingly, including the year it relates to when the PEIR/ES is produced. The EIA Scoping Report does not do this consistently.
358	15.3.1.12	Need to ensure that the most up to date baseline data is used in the assessment. For example, GVA data for the year 2016 is reported in the EIA Scoping Report. This is not the latest data available (2020 estimates are available from the ONS). Similarly, population data is reported from the 2011 Census. This is over 10-years old and therefore is considered to under report the population of the Study Area. Mid-Year Population Estimates (MYPE) published by the ONS or 2021 Census data should be used as the source of population data.
356	15.3	Total resident population is reported. The assessment should also consider the age profile of the population to identify key life stage cohorts in the Study Area's population (for example, children, working age and older persons).

	Figure 15-1 Appendix A	Figure 15-1 identifies the socio-economic receptors. For the PEIR/ES details of the individual receptors should be incorporated (i.e. in table format) and the distance of each individual receptor from the RTS reported. This will enable quantification of the number of places of worship, education establishments etc. that have the potential to be affected.
367	15.3.2.1	The future population of the Study Area should be reported in the future baseline using the ONS Sub-National Population Projections.
367	15.3.2	The future baseline currently presented references different years (mid-2030, 2039 and 2045). The future baseline should be consistent and represent the completion year where possible.
	15.3	The baseline should report on the number of homes in the Study Area (and each of the respective local authority boroughs).
Scoped in/out topics		
		The previous EIA Scoping Report (2017) identified the potential for temporary adverse effects during the construction phase on air quality and odour with potential implications for the health of the local communities and associated effects on livelihoods of commercial businesses. It is appreciated that the health of local communities will be covered within the separate Health ES Chapter. However, the socio-economic assessment should include an assessment on the associated effects on livelihoods of commercial businesses.
		Similarly, the previous EIA Scoping Report (2017) identified the potential for an adverse effect on local residents by overlook from the 'beacons' to private residential properties but this is not mentioned in the latest EIA Scoping Report. Such effects should be scoped into the assessment.
		Surrey County Council requested the inclusion of noise and vibration effects on the amenity of nearby residential properties to be considered. This does not appear to have been scoped into the EIA but should be included even if just through cross-reference to the Noise assessment and subsequent findings.

## 1.16 Soils and Land

Page	Reference	Comment
<b>General</b>		
380	16.1.1.2 & 16.1.1.4	It is noted that this paragraph indicates that effects from contamination on water quality is covered in this section, and then Paragraph 16.1.1.4 contradictorily indicates that the assessment of groundwater and surface water quality in relation to land potentially affected by contamination is covered in Chapter 18: Water Environment. This is acceptable providing the interaction between land potentially affected by contamination and the impacts and effects on water quality are adequately covered in Chapter 18: Water

		<p>Environment and adequately cross referenced in this chapter. The assessment should also include potential impacts and effects on private water supplies within the study area.</p> <p>In Chapter 18 - It is noted that the suite of testing determinands for the groundwater monitoring, referred to in Reference 18.2.1.11 is not described or justified. Groundwater baseline monitoring must be carried out, covering a range of appropriate determinands that are agreed with the Host Authorities and the EA. An appropriate hydrogeological risk assessment of the potential impacts on groundwater quality from the project including the potential to mobilise existing contamination and create new pathways for contamination must be carried out in accordance with appropriate best practice, to a scope agreed with the Host Authorities and the EA.</p>
381	16.2.1.1	The baseline methodology is indicated to have been informed by a Desk Based Assessment (DBA). The DBA has not been submitted with the EIA Scoping Report and therefore cannot be commented upon at this stage.
405	16.8.1.4	The stakeholders should be defined and include the LA's and the EA where controlled waters are concerned
	General	The EIA Scoping Report identifies that there is agricultural land of quality grades 2 and 3 (very good and good to moderate) within the study area. Agricultural land of grades 2 and 3a is defined by Natural England as the Best and Most Versatile (BMV). It is not entirely clear whether Soils as a resource, and agricultural land are proposed to be scoped into the ES, although it may be that Reference 16.4.1.1 (1) and (2) are intended to convey that, but it in any case we consider that Soils as a resource, and agricultural land are scoped into the ES. This should include, as previously requested by NE, an assessment that takes account of the ecosystem services they provide as a resource. The Scoping Report does not set out the methodology by which any assessment of soils and agricultural land will be undertaken, and we advise that this must be completed in accordance with best practice and measures to protect soil resources should be in accordance with the 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' (Defra 2009).
	General	The Geology and Soils chapter of the EIA Scoping Report does not make any reference to land stability and/or geological hazards. It is advised that a preliminary land stability risk assessment should be undertaken, with the findings used to inform the EIA.
Data/survey		
381 & 382	16.2.1.2 & 16.2.1.4	<p>The EIA Scoping Report refers to historical ground investigations, however the locations and therefore coverage of the scoping boundary has not been submitted and the adequacy of the coverage cannot be commented on. It is incumbent on the Applicant that the GI coverage is adequate to inform a robust ES, engagement with the Host Authorities on this topic is required</p> <p>It is noted that further baseline surveys are proposed to inform the ES. The scope and methodology of such surveys should be agreed with the Host Authorities and EA before the works are undertaken.</p>



		<p>There is likely to be relevant ground condition information available in the public domain for some areas of the project, associated with the Esso Southampton to London Pipeline scheme – which was required to undertake ground investigations as part of the DCO.</p>
382	16.2.1.4	<p>The EIA Scoping Report describes that sources of potential land contamination have been identified within the land quality study area, that there are likely significant effects relating to land contamination, and that 'remediation of contaminated land will be considered where appropriate' (Reference 16.6.2.1 (1)).</p> <p>We advise that as the project could give rise to significant environmental effects in relation to land contamination, the full process of ground investigation, risk assessment, options appraisals and preparation of a mitigation and/or remediation strategy (as appropriate) will be needed to support the DCO application and inform the EIA. This process must be undertaken in accordance with that set out in Land Contamination Risk Management (LCRM), published by the Environment Agency.</p> <p>The need for further baseline surveys is noted. We advise that in accordance with Stage 1 risk assessment (LCRM) the Applicant will be required to provide a Phase 1 desktop study and walkover for the entire land quality study area. This should include a preliminary risk assessment that identifies and evaluates all potential sources and impacts of land and/or groundwater contamination relevant to the site. This should comply with BS10175: Investigation of potentially contaminated sites code of practice and be undertaken by a competent person. It is acknowledged that a DBA is indicated to have been carried out – however this has not been submitted with the EIA Scoping Report. It is advised that the Phase 1 desktop study must include all potential sources of contamination (including ground/landfill gas) at the time of preparation and be informed by data as up to date as practicable.</p> <p>Landfill information has been provided for licensed activity and we advise that details regarding unlicensed activities should also be provided.</p> <p>Given the nature of the project and anticipated ground conditions within the scoping boundary, a Phase 2 intrusive investigation is likely to be required to fully and effectively characterize the nature and extent of any land and/or groundwater contamination and provide information for a detailed assessment of the risks to all receptors that may be affected. This should include ground gas and a ground gas risk assessment, as appropriate. As a minimum Tier 2 Generic quantitative risk assessment is anticipated but it may also be necessary, depending on the outcome of the Tier 2 GQRA, to undertake Tier 3 Detailed quantitative risk assessment (DQRA). This should comply with guidance provided by LCRM and be undertaken by a competent person (whose details should be included in the ES).</p>

		<p>Depending on the findings of the Stage 1 risk assessment (LCRM), Stage 2 options appraisal (LCRM) may be required to address any contamination linkages. The results of the Phase 2 intrusive investigation and detailed risk assessment should be used to prepare the options appraisal and remediation strategy. It should provide full details of the remediation measures required, how they are to be undertaken and a plan for how they will be verified and reported. It should also identify the need for any longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The options appraisal and remediation strategy will need to be agreed in writing by the LPA and EA prior to commencement and implemented to the satisfaction of the LPA and EA, by a competent person (whose details should be included in the ES).</p> <p>The reports produced at the various stages of risk assessment must be appended to the ES.</p> <p>There is potential for direct impacts on ground conditions and both groundwater and surface water quality arising from implementation of any remediation strategy. Therefore, the mitigation and / or remediation strategy will need to be developed to the stage where the environmental impacts of implementing the strategy can be assessed as part of the EIA. In addition, there may be inter topic effects from the implementation of the remediation strategy, including in relation to dust, noise, traffic, waste etc, and therefore the impacts of the remediation strategy must also be considered within the assessment of other relevant ES topics as appropriate.</p>
405	16.8.1.6	Notwithstanding that further GI will be required to inform design – sufficient GI must be undertaken to inform the ES. The GI must itself be informed by the Phase 1 desktop study and preliminary risk assessment based on all current and historical land uses where there is potential for contamination sources. Geoenvironmental sampling and testing of soils must be appropriate to the anticipated ground conditions based on the current and historical land uses e.g. including PFAS testing in landfill areas.
Scoping area / area of assessment		
384	16.2.3.4	<p>The study area for Land potentially affected by contamination is proposed to be 250m. In the context that the scope of this chapter is described as being limited to soils (Reference 16.1.1.2) and notwithstanding the contradiction highlighted above (References 16.1.1.2 &amp; 16.1.1.4), the study area is acceptable. However, where Land potentially affected by contamination has the potential to impact on groundwater quality, the study area is likely to need to be much greater.</p> <p>Further engagement with the Host Authorities is required on this topic.</p>
Scoped in/out topics		
402	16.7.3.1	It is proposed that a Hydrogeological Risk Assessment is undertaken to assess the magnitude of effects in relation to groundwater flow and pathways. It is advised that Hydrogeological Risk Assessment will also be required to assess the magnitude of effects in relation to groundwater quality.

395	16.5.1.1	The management of material, including movement of hazardous material/waste off site should be undertaken in accordance with a Materials Management Plan (MMP) and in accordance with the Deposit of Waste Code of Practice (DoWCoP).
403	16.7.3.4	The scoping report makes reference to chemical suitability of materials for re-use, but not geotechnical suitability. Where material is proposed for re-use – both the geotechnical and geochemical suitability must be assessed. Material for re-use must be assessed and re-used in accordance with a MMP and in accordance with the DoWCoP.
Significance Criteria		
399	16.7.2	Geological receptors should be included in the significance criteria
399	16.7.2	Soils and agricultural land should be included in the significance criteria
399	16.7.2.3	Any human receptors should be considered as high sensitivity.
400	16.7.2.7 to 16.7.2.9	The definitions of magnitude of effects should include reference to acute and chronic risk to human health, or a definition of 'harmful'. The magnitude of effects should include definitions for all identified receptors e.g. soils and agricultural land, land stability, controlled waters, geology etc and should be defined beyond reference to 'statutory guidance'.
401	16.7.2.12 to 16.7.2.17	The definitions of significant effects should be aligned with the S-P-R risk assessment method for contaminated land and defined for each receptor identified, e.g. soils and agriculture, land stability, geology, controlled waters etc

### 1.17 Traffic and Transport

Page	Reference	Comment
General		
407-430	General	The County Highway Authority does not have any comments to make at this stage on the proposed scope of the EIA for the scheme. A Transport Assessment (TA) would be required with the DCO application. The County Highway Authority has been engaged in discussions with the Applicant in respect of the TA for the RTS over a number of years, including through previous EIA Scoping and pre-application planning advice. The County Highways Authority would expect that such engagement would continue, through the Technical Working Group proposed above, as the scheme develops and progresses through the DCO process.

410	17.2.2.8	Barge movements will need to be considered within the air quality assessment. Should there be mitigation applied, for example signage to prevent idling of vessel engines. Paragraph 17.3.2.12 mentions the potential effects on navigation associated with the bed lowering downstream of the Desborough Cut. Will this lead to increased waiting times at locks etc where boats may be idling their engines?
412	17.2.4.1	This approach will take traffic through areas of the AQMA that are sensitive to a deterioration in air quality and increases in noise. Given the position of the scheme route in Spelthorne adjacent in places to the M3, has the option of having a project specific temporary exit into a compound directly from the M3 not been considered in order to take HGVs directly to the worksites?  Potential cumulative impacts could occur with the traffic related to the operation of the recent Shepperton Studios development. Filming tends to involve HGVs for materials/supplies, welfare and to bring in sets and catering.
418	17.5.1.1	Will there be upgrades to any of the existing infrastructure that is identified as congested and thereby contributing to poor air quality such as the Sunbury Cross M3 Junction? As the RTS could potentially attract traffic to visit the amenity areas. Traffic from West London is likely to access via the A316 and exit at that junction.
420	17.6.3	Some of the proposed land uses such as water sports and cycling are likely to attract visitors, namely by car. which may car traffic to carry equipment such as canoes and family bicycles to the facilities.  Will there be infrastructure measures such as secure cycle parking to allow visitors to lock up bicycles whilst using these facilities?  The closest railways station in Spelthorne is Shepperton, there are no bathroom facilities for families to use at that station. Improving the facilities at the station and providing more public bathrooms along the scheme route would help to enable families visiting the scheme to use the public transport and active travel modes rather than drive. This would also help the Borough to facilitate more active travel for school pupils between Staines, Shepperton and Sunbury where currently there is one public toilet in Shepperton Highstreet for a walk along the river and scheme of approximately 4 to 5 miles.
421	17.7.1	These thresholds are different to those required for air quality modelling, can clarification be given as to whether a separate criteria will apply to the traffic data supplied for screening for air quality assessment purposes?
422	17.7.1.7	Please confirm what denotes a sensitive area.
422	17.7.1.8	The local authorities that make up the Project Group are actively encouraging public transport use and active travel. Although it is recognised the construction period is temporary this will be a prolonged period

		<p>of disruption. Minimising disruption to services is necessary for the Project Group to continue to promote and encourage active travel across the County.</p> <p>Many of the bus routes are long and are relied upon particularly by college students and school pupils and the elderly. These services are vital to keeping car trips down in the already congested morning peak.</p> <p>Earlier in the chapter the congestion is acknowledged, and delays are referenced which is contrary to this statement. Mitigation would be strongly encouraged from the perspective of SBC.</p>
423	17.7.1.10	<p>Community severance regarding the RTS may not be solely the result of issues concerning the roads. The IEMA Severance Criteria presented are based on AADT screening.</p> <p>Is an additional broader approach needed in terms of assessing transport severance geographically given this is a channel and there will be impacts on footpaths, bridleways etc and access to local facilities by those modes also. How the scheme, where traffic flows will increase, can physically be navigated in terms of crossings will be very important in supporting active travel.</p> <p>Many of the existing crossings in Spelthorne rely on pedestrians waiting for vehicles to stop to allow them to cross, that will become harder where traffic flows increase, and alternative crossing facilities may be required.</p> <p>The RTS could generate pinch points where there are an increased number of cyclists and pedestrians at an entrance point encountering an increased volume of traffic for example on or crossing links on the routes to car parks, will this be assessed in terms of the physical mitigation to give adequate priority to pedestrians and cyclists safely?</p>
429	17.8	<p>There seems to be an increase in weekend traffic flows compared with prior to the Covid-19 pandemic (within Spelthorne). That may be of relevance to the RTS assessments, therefore the Transport Planning team at Surrey County Council should be consulted regarding post pandemic traffic behaviour.</p>

## 1.18 Water Environment

Page	Reference	Comment
Data/survey		
433	18.2.1.5	Fluvial assessment has been undertaken with a more detailed hydromorphological assessment planned to gain information on sediment transport, deposition, and erosion in the proposed RTS channel. This should include surveying the waterbodies upstream and downstream to establish any change to existing conditions since 2017 and prevent any impact from the design impacting these reaches.
435	18.2.1.14	Sediment samples have occurred and been used to determine if site material can be used elsewhere. What are the proposals for re-use / Can it be utilised for the proposed works? This will need to be considered within the Material and Waste ES Chapter. Can the bed substrate be site-won material? Further engagement with the Host Authorities is required on this topic.
435	18.2.1.17	Modelling has been undertaken / is being carried out, but neither the model or outputs have been provided at this stage. The modelling has been undertaken to establish surface water, groundwater hydrodynamic water quality and sediment transport in the proposed flood channel. Was this done for flood flows and normal 'low' flows to establish all conditions? Has current abstraction been included? Further engagement with the Host Authorities is required on this topic.
436	18.2.1.19	Modelling of the Jubilee River, a surrogate system, has been undertaken to establish the minimum flow with no detrimental impact on water quality. Has monitoring of the Jubilee River been undertaken and can it be included to aid this design to establish what works well and what could have been done differently? Further engagement with the Host Authorities is required on this topic.
437	18.2.1.22	Sediment transport modelling has been completed for the flood channel, to establish long term balance of sediment movement which has been used to establish maintenance. What are the main conclusions? Does the channel become a sediment sink in non-flood conditions?
	General	As modelling has been carried out/is being carried but was not provided with the EIA Scoping Report, further engagement with the Host Authorities is required to determine the suitability of the data and the assessment.
Scoping area / area of assessment		

446	18.3.1.12	Historic modification has been assessed for the lower water bodies. Their impacts on sediment movement and surface water have been noted. Has a more in depth historic modification check been done? Has this been done for all waterbodies?
451	18.3.2.2	It has been noted that new River Basin Management Plan (RBMP) is due to be released. It should be noted, that if the new RBMP is released before the start of the construction works, the WFD assessment should be updated to match the changed objectives and condition classifications.
452	18.3.2.4	Construction works may impact abstraction sites and rates through potential changes to flow and water quality. Any potential changes to abstraction sites and rates will be required to be assessed in the EIA.
453	18.3.3.1	It is noted that multiple licensed abstraction points occur. The ES will need to clearly state these are a limitation as the proposed works will need to ensure flow is still available for them, but that flow may / will change if these licenses are not continued into the future, this should be assessed in the EIA.
Scoped in/out topics		
453	18.4.1.1	It is noted that sheet pile construction could impact groundwater, however sheet piles will also reduce the riparian cover and have a detrimental impact to habitat variation and availability, which would need to also be considered within the Biodiversity chapter of the ES
453	18.4.1.1	It is noted that the impact of using site won material has been highlighted. The proposed scheme passes through landfill and there is a risk this could impact the surface water and groundwater water quality and pollute the water systems.
453	18.4.1.1	Movement of hazardous material has been highlighted to have an adverse impact on the watercourses, however, it is not clear how. Further explanation is required. The assessment should consider impacts to water quality and sediment processes.
454	18.4.1.1	River bed and bank lowering has been highlighted as having an impact. However, reducing bank levels could also impact habitats and impact the sediment processes in the watercourse. Lowering the bed will also impact flow as you are altering the gradient in a least one location. This will impact low flow conditions and sediment processes, this will need to be considered as part of the EIA.
454	18.4.2.1	Mention of adverse impacts to water quality, flow, hydromorphology and biological conditions as a result of the proposed flood channel and operation of flow control features has been highlighted.
455	18.4.2.1	Impact to sediment processes downstream is highlighted as a result of augmented flow, but flow in downstream reaches will also be impacted, therefore habitats could be impacted and should therefore be considered within the EIA.
456	18.4.2.1	Dredging will also impact the sediment processes (transport, deposition and erosion) in downstream reaches, not just water quality. This needs to be considered within the EIA.
458	18.5.2.1	Moving the weir location at Sunbury and Teddington weirs to downstream of the weir pools will mean a change in sediment processes. The upstream weir pool (existing weir pool) will be infilled by deposition

		caused by the weir impoundment, and the downstream section will form a new weir pool. The overall impact is minimal as the sediment processes will eventually change back to existing conditions, but this change needs to be highlighted and should therefore be in Paragraph 18.4.2 effects scoped in. Moving the structure at Molesey will also have an impact on sediment processes.
458	18.5.2.1	Bank erosion protection built in should be green where possible, to ensure riparian cover is continuous and the channel is as 'natural' as possible to minimise net loss of biodiversity and encourage aquatic flora and fauna to become established on the new channel walls
459	18.6.2.1	Installing silt traps, clearly state that this will be at the downstream of all works.
Approach		
483	18.7.4.1	Examples should be given of other topics that will influence the reception and require additional assessment.

### 1.19 Cumulative Effects Assessment

Page	Reference	Comment
General		
484-490	General	The Project Group has no comments to make at this stage of the process on the proposed scope of the cumulative effects assessment (CEA) as set out in Chapter 19 and Appendix L of the EIA Scoping Report. The proposed approach appears consistent with that recommended in Advice Note 17 for NSIPs. The Project Group is content that the schemes listed in Appendix L as major developments for which planning applications has been sought is accurate at this point in time. The Project Group will engage with the Applicant to ensure that the CEA captures all relevant schemes as the project progresses through the DCO process.



# River Thames Scheme

## Non-Statutory Consultation Response

On behalf of **the Project Group**



## Contents

- 1 Introduction..... 1**
  - 1.1 Purpose of document ..... 1
  - 1.2 Scheme Overview ..... 1
  - 1.3 Need for the Scheme ..... 1
- 2 Approach to Consultation ..... 3**
- 3 Response to Non-Statutory Consultation Brochure..... 5**
  - 3.1 Integrated scheme/Scheme Description ..... 5
  - 3.2 Changes to the River Thames Scheme / Alternative Schemes ..... 5
- 4 Response to Non-Statutory Consultation Brochure - Review of Environmental Considerations ..... 6**
  - 4.1 Introduction ..... 6
  - 4.2 Flood Risk and Water Quality ..... 6
  - 4.3 Materials and Waste ..... 7
  - 4.4 Ground contamination ..... 7
  - 4.5 Landscape and Visual ..... 8
  - 4.6 Socio-economics ..... 9
  - 4.7 Transport ..... 10
  - 4.8 Heritage and Archaeology ..... 10
  - 4.9 Biodiversity ..... 11
  - 4.10 Health and Social Value ..... 13
  - 4.11 Noise and vibration ..... 13
  - 4.12 Air quality ..... 14
  - 4.13 Climate ..... 15
- 5 Summary and Next Steps ..... 16**
  - 5.1 Summary ..... 16
  - 5.2 Next Steps and recommendations ..... 17

## Figures

No table of figures entries found.

## Tables

No table of figures entries found.

## Appendices

Appendix A Proposal for use of land associated with the RTS for Suitable Accessible Natural Greenspace

*This page is intentionally blank*

# 1 Introduction

## 1.1 Purpose of document

- 1.1.1 This document sets out the Project Group's (Surrey County Council, Runnymede Borough Council, Spelthorne Borough Council and Elmbridge Borough Council) response to the River Thames Scheme (RTS) Non-Statutory Consultation (8 November 2022 - 20th December 2022). The Project Group are the Host Authorities for the RTS, as they are Council's in which the development is situated. The RTS is an infrastructure project of national significance and will be consented through a Development Consent Order (DCO). As part of this process, the Applicant (Surrey County Council and the Environment Agency (EA)) is undertaking a Non-Statutory Consultation, hereafter referred to as the Consultation, to inform stakeholders of the proposed scheme.

## 1.2 Scheme Overview

- 1.2.1 The RTS proposes an integrated scheme comprising of three parts: flood alleviation, community spaces and habitat creation areas.
1. Flood Alleviation – Creation of a new river channel in two sections through Runnymede and Spelthorne, totalling over 8.5km. These will act as new flow routes for excess water when water levels in the River Thames rise too high. Downstream of Desborough Cut, the river bed will be lowered. Additionally, improvements will be made to the Sunbury, Molesey, and Teddington weirs, to include installing more gates that can be opened when river levels rise.
  2. Community Spaces – Proposed opportunities to create recreational spaces for the community. This is expected to include new foot and cycle paths and play and picnic areas. There will also be new ways to access the river and take part in activities such as fishing, canoeing, and boating.
  3. Habitat creation areas – the scheme also proposes to improve and create high quality natural habitats (also known as habitat creation areas) to increase biodiversity This will help to preserve and encourage wildlife in the area.
- 1.2.2 Each element of the RTS is proposed to work together to deliver benefits for communities and the environment. The RTS proposes to reduce the risk of flooding to the surrounding homes, businesses, and infrastructure, provide habitats for wildlife and a new landscape feature, increase access to green open spaces and sustainable travel routes, drive inclusive economic growth, and enhance biodiversity.
- 1.2.3 The RTS will be the first flood and climate mitigation project which is described as nationally significant.

## 1.3 Need for the Scheme

- 1.3.1 The River Thames between Egham and Teddington runs through the largest area of populated but undefended floodplain in England. In addition to the towns and villages in this area, the landscape has been heavily shaped by major infrastructure and extensive mineral workings. This has resulted in an area in which many homes and businesses are at risk of flooding. The River Thames has a long history of flooding, in 2014, over 900 homes flooded, with major impacts on families, roads and supply of services. With climate change, the risk of flooding is growing. The proposed new flood channel will aim to reduce the risk of flooding to homes, businesses, and infrastructure.
- 1.3.2 The stretch of the River Thames between Egham and Teddington has lots of potential to provide economic, health and environmental benefits to the community. However, flood risk, lack of

access to open space areas, and poor-quality natural habitats mean that it is currently unable to fulfil this potential.

### **History of the Scheme**

- 1.3.3 In 2009, a consultation on the Lower Thames Risk Management Strategy was held by the EA. This strategy was agreed in 2011 with a recommendation for the RTS.
- 1.3.4 Planning and design commenced in 2014 and the first public consultation was held in 2016. The 2016 consultation concentrated on what routes the (then) three proposed channel sections would take, and how the River Thames could be altered to increase water capacity and flow. Since the 2016 consultation, the proposed three channels have been reduced to two channels due to lack of funding.
- 1.3.5 In December 2020, The Government declared that the RTS is a project of national significance and therefore it requires a DCO.
- 1.3.6 In June 2021, Defra and HM Treasury approved the outline business case, comprising details of the scheme, approach, and budget.

## 2 Approach to Consultation

- 2.1.1 The RTS has progressed further since the 2016 consultation. It now incorporates design elements to reduce flood risk and aims to create better access routes to enhance exercise and recreational opportunities for the public. In addition, it intends to create a better habitat network and drive sustainable, inclusive economic growth.
- 2.1.2 This Consultation aims to gather opinions from the general public, landowners, local authorities, community groups and environmental and regulatory organisations, on the proposals for the RTS.
- 2.1.3 The Consultation aims to gain an understanding on opinions regarding the proposal to lower the riverbed downstream of the Desborough Cut, the provision of a more sustainable travel network, better access to open green spaces, and improved connections to wildlife and habitat quality. In addition, the consultation intends to develop insight into what is required for inclusive economic growth, and how to ensure the construction process prioritises sustainability.
- 2.1.4 The Consultation is a hybrid consultation, incorporating online and in person events. The Project Group has the following comments regarding the approach to consultation:
- Consultation content – The Consultation consists of high-level information lacking in detail on the proposed design of amenity features and any potential environmental impacts. There is also a lack of clarity on the details of the scheme proposed and no clear position on matters such as the proposed landscape strategy and if the beacons/ mounds that were proposed in the previous consultation, will still form part of this proposed scheme. These are key elements of the scheme where community engagement and involvement of the host authorities would be required, yet this Consultation does not appear to deal or address this. It is understood that further information will follow as part of a series of technical workshops with statutory stakeholders and, and the Project Group look forward to having an active role in these, and a Statutory Consultation will be held toward the end of 2023.
  - Online information – The online consultation events were well organised and engaging. The Project Group were issued a Consultation brochure, however, consultation information online is presented in a series of web pages. The web pages are slightly difficult to navigate through. Downloadable documents would have made for easier reading for stakeholders.
  - Consultation events – The Project Group understand that the Applicant is in the early stages of design and more information will be given in due course, however, details on landscape/habitat creation areas would have been useful to review and comment on at the early stages of design.
  - In-person events – The in-person consultation events were well organised, and stakeholders were given further information when requested. It may have been prudent to not have an in-person event on the launch of the Consultation (8 November 2022). Hosting an in-person event after the launch date allows stakeholders to digest the consultation information and attend consultation events better informed to ask questions. Furthermore, whilst it is recognised that the scheme extends over a large area, locals only have the opportunity for one in-person event per town. For example, the two in-person events within the Borough of Runnymede are in Egham on a Tuesday or Chertsey on a Wednesday. None in the Borough are during the weekend and none are in areas such as Thorpe which is also affected by the proposal.
  - Online consultation events – Some of the online events were fully booked, which may have been a deterrent to stakeholders to request attendance. This was fed back to the Applicant and further dates were added to the programme of online consultation events. It is also

noted that in order to attend a virtual event you have to sign up via an email which is not very user friendly

- 2.1.5 Once this Consultation stage is completed, there will be further consultation proposed for late 2023. This will be specifically related to the proposed design of the scheme. There is a concern that much of the design work that will be on-going throughout 2023 will be presented as a *fait accompli* at the following consultation (late 2023) and therefore the Project Group is engaged with at early stage, before design work advances.

## 3 Response to Non-Statutory Consultation Brochure

### 3.1 Integrated scheme/Scheme Description

- 3.1.1 The RTS will run from Egham to Teddington. As part of this, the RTS proposes a new river channel comprising two sections: the Runnymede channel section and the Spelthorne channel section. When water levels rise too high, these channel sections will provide new flow routes for the excess water. The channel route will go through existing lakes and watercourse, enabling it to blend in with the existing landscape.
- 3.1.2 The information provided within the Consultation brochure does not contain any detail or drawings to understand how the elements of the RTS; new channel, active travel routes and links to communities, recreational areas and habitat creation areas are sensitivity designed to integrate into the existing landscape. Further information is sought.

### 3.2 Changes to the River Thames Scheme / Alternative Schemes

Chapter 2 of the Consultation brochure, 'Considered so far', provides different options that were considered as part of the RTS. However, there is no information on alternative route options or how alternatives were assessed. An alternatives assessment will be required as part of the Environmental Impact Assessment (EIA) process:

- 3.2.1 *"A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."* The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Schedule 4 (2)
- 3.2.2 Comments are provided below on the alternative options provided within the Consultation brochure as part of the RTS:
- Datchet to Hythe End Channel section - Originally, there were three channel sections incorporated into RTS. The third channel section was proposed to run from Datchet to Hythe end. However, insufficient funding meant that this was too costly to deliver, and therefore removed from the scheme. Has the RTS been altered further to accommodate the removal of the Datchet to Hythe End Channel section? Further information needs to be submitted regarding the impact of the removal of the RBWM part of the channel on the areas of Englefield Green and Thorpe.
  - Desborough Cut - It is understood that following the 2016 consultation there was strong opposition not to widen Desborough Cut and lowering of the Desborough Cut was rejected on the grounds of environmental impacts, costs, impacts on traffic, maintenance and health and safety concerns. The Consultation brochure highlights that environmental impacts would be less downstream of Desborough Cut than Desborough Cut itself, but no further information is provided to confirm this.
  - Local flood defences - where flood defences are provided for the RTS, these should take into consideration the locality of the area and be sensitively designed to integrate into the existing environment.



## 4 Response to Non-Statutory Consultation Brochure - Review of Environmental Considerations

### 4.1 Introduction

- 4.1.1 The information provided within the Consultation is high-level and lacks detail on potential environmental impacts. This chapter therefore highlights information that the Project Group requires further engagement on, expects to see at the next round of consultation, and provides a response to the Consultation brochure.

### 4.2 Flood Risk and Water Quality

#### Flooding

- 4.2.1 The Consultation brochure makes several references to the flood alleviation benefits associated with the RTS, and the modelling used as a basis for this statement. However, the modelling referred to is not provided as part of the Consultation and it remains unclear how the flood zones would change as a result of the construction of the RTS proposals. Therefore, the 'with' and 'without' scenario modelling is sought.
- 4.2.2 This modelling would aid the review of Runnymede's 2030 Local Plan which commenced in January 2021. Over the next year, Runnymede need to understand what the difference is likely to be to the flood zones in Runnymede. This will help Runnymede Council plan for future growth in the Borough in the next iteration of the Local Plan which will plan up to at least 2040. Additionally, the Planning Policy team at Runnymede Council attends quarterly meetings with the Residents Associations whereby a number of the groups expressed concern and frustration that the RTS 'with' and 'without' scheme models had not been made available to the public, making it difficult for them to understand the benefits of the scheme, and to draw conclusions as to whether the improvements to flood risk will be realised. It would be helpful to understand when this modelling will be available to both the Project Group and the public. The Project Group also seek confirmation as to whether the modelling has been updated to account for the new definition of the functional floodplain as published in the Planning Practice Guidance (August 2022).

#### The importance of the floodplain

- 4.2.3 Connecting the floodplain helps to store water and reduce flooding downstream and will help to reconnect areas of open floodplain that can be used as storage. Having open floodplains allows infiltration to occur which also acts as storage, and therefore it is important not to use impermeable materials when designing the leisure, recreation and community uses of the floodplain. The RTS should not reduce the floodplain capacity.
- 4.2.4 The Consultation provides a high-level overview of the flood risk benefits of the scheme summarising both its goal of reducing flood risk to the area and ensuring no increased risk to upstream and downstream communities. Further information would be needed, as the scheme progresses, to review these goals.

#### Water Quality

- 4.2.5 Monitoring of the water quality throughout the scheme area will help to prevent deterioration and will show any benefits; as long as monitoring is continued throughout construction and post construction. There is a potential risk of pollution to the groundwater from contaminated land, therefore monitoring of the groundwater quality throughout the construction phase is vital to

prevent any deterioration of groundwater quality. For example, if a pollution sample is recorded, work should be stopped to control the contamination and prevent future pollution.

- 4.2.6 The constant supply of water to the reach will allow flow variation and different sediment processes to occur within the channel; which will help control fine sediment distribution through the scheme. Therefore, it is necessary to ensure that the non-flood water levels are high enough to maintain a flow through the scheme and prevent stagnation of water to occur.

#### **Groundwater Quality**

- 4.2.7 Within the Consultation brochure, it is described that monitoring of rivers, lakes and groundwater within the RTS has been undertaken over the last decade, and the information will be used to limit impacts, where possible. It is considered that an objective of the scheme should be to improve water quality, not just limit the impacts of the scheme on water quality. Further information should be provided regarding the nature of the monitoring that has been undertaken, what the information shows, and how this will be used and assessed as part of the scheme development. Information regarding the proposed monitoring and validation of the potential impacts on groundwater and surface water quality should be provided. Open water swimming in the Thames is noted within the Consultation brochure as a potential benefit of the scheme, water quality should be considered from a health perspective.

#### **Local Flood Defences**

- 4.2.8 New localised flood defences will be utilised, where required, in the form of raised embankments, walls, small barriers in ditches or individual property protection. Local flood defences should be sensitively designed in keeping with the local environment.

### **4.3 Materials and Waste**

- 4.3.1 The Project Group welcomes the Applicant's commitment to embedding the Waste Hierarchy within the design of the RTS. However, within the Materials Management section (page 36) it outlines the process of reduce, reuse, recycle, but does not provide details of the lifecycle of potential materials utilised in the scheme and other finer details associated with materials use and management. Further engagement is sought on the material re-use strategy.
- 4.3.2 Surrey benefits from a full set of up-to-date minerals and waste development plan documents and supplementary plan documents. The Minerals and Waste Planning Authority (MWPA) is currently preparing the County's first joint minerals and waste local plan which will seek to provide for a minerals and waste development framework for a period of 15 years (2024-2039). Appropriate consideration should be given to emerging minerals and waste policy during scheme development and the DCO process.

### **4.4 Ground Contamination**

#### **Ground Investigations**

- 4.4.1 Ground investigation and associated geochemical and gas data should be shared with the Project Group, given the jurisdiction of the Council's over land contamination matters under both Part 2A of the Environmental Protection Act 1990 and within the planning process.

#### **Land Contamination**

- 4.4.2 The Consultation brochure is generally lacking in any detail regarding the potential for impacts on human health, controlled waters and the environment, from potentially contaminated soils/materials.

- 4.4.3 There is no mention of agricultural land, designated sites or minerals in the Consultation brochure. Information regarding the consideration of, and assessment of, impacts to these aspects is required.
- 4.4.4 The Project Group has concerns about the proposed channel going through landfill sites. There is no specific information in the Consultation brochure as to which landfills would be impacted and how the Applicant will protect the rest of the landfill, the water channel and the environment. In the Consultation brochure, it is indicated that a barrier will be designed for incorporation into the new channel sections, to prevent contamination from the landfills getting into the channel. However, where the excavated landfill material is intended for re-use within the scheme, assessment of the risks to human health and livestock is required and should be undertaken and provided. It is acknowledged that there is a degree of risk in going through the landfill, but the Consultation contains no information on what is happening to that material. Future information is required to understand the potential impacts the re-use of material will have on the environment and end users.
- 4.4.5 There is no discussion regarding landfill/ground gas in the Consultation brochure. Information regarding the current ground gas regime, how this will change, and the potential impacts of this is required.
- 4.4.6 The Consultation brochure states that there will be opportunities for recreational community space such as foot paths, cycle paths, play and picnic areas. There will be a requirement to ensure that soils are suitable for the intended end use in accordance with relevant best practice guidance. In some areas remediation may be required to achieve geochemically suitable soil for the intended end use. If there is the intention of any agricultural use such as grazing of animals, then that land end use would need to be considered.
- 4.4.7 The methods of assessing excavated waste material for suitability for re-use (geochemically and geotechnically) should be provided. The Consultation brochure does not mention geohazards or land stability and details of how these aspects are being considered and assessed is required.
- 4.4.8 There is no reference within the Consultation brochure of the process for any mineral that is encountered as part of the scheme. Would minerals be extracted prior to works commencing on site, and if so, what would happen with the minerals?
- 4.4.9 With increased volumes of water coming into waterbodies such as Littleton Lake this could agitate sediment and lead to turbidity and sediment in the water column. However, there is no detail in the Consultation brochure on the wide-ranging monitoring that will need to be carried out post the construction of the RTS. The Applicant may want to familiarise themselves with planning conditions for existing MWPA permissions in the area, some of which include environmental monitoring requirements which may be of interest.

## **4.5 Landscape and Visual**

### **Landscape design**

- 4.5.1 It is important that the next stage of engagement provides further information on landscape and biodiversity design elements, such as new green infrastructure features, new landforms, habitat creation areas or other changes to topography and local landscape character, including from the influence of excavated materials or otherwise.
- 4.5.2 RTS is proposed in an area that is predominantly rural and flat in profile. For example, within the Borough of Spelthorne, the whole of the Laleham and Shepperton area is flat in character. Policy EN1 of Spelthorne Borough Council Core Strategy and Policies DPD states that proposals for new development should demonstrate that they will create buildings and places that are attractive with their own distinct identity; they should respect and make a positive

contribution to the street scene and the character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.

- 4.5.3 The previous consultation proposed beacon style hills up to 15m in height. It is understood from the Consultation that the Applicant intends to re-use excavated material for the habitat creation areas. Further clarification is sought and strong concerns raised on the quantum/volume of material to be removed and re-used and where /what implications this has for the landscaping design. The Project Group is concerned with regards to the potential design of the habitat creation areas, and how these will be integrated into the surrounding area. The Project Group feel it would have been valuable if the initial design of the habitat creation areas was provided within the Consultation to give the public an opportunity to comment on the landscape features, before the design advances too far. The Project Group is also concerned that the potential beacon-style hills proposed at the last consultation will be out of character with the existing area that is flat in profile.
- 4.5.4 Viewpoints will need to be agreed with the Project Group and further engagement is sought to enable appropriate technical input to this process. In due course, consideration should be given to producing visualisations for any predicted significant construction effects such as construction compounds and infrastructure including tall plant.
- 4.5.5 Further detail is sought on the 'raised walkways', in order to understand the implications on the landscape character of the area and amenity of existing residents (overlooking, loss of amenity)
- 4.5.6 We acknowledge that as part of the RTS further appropriate infrastructure may be required, such as car parking, in open spaces, however, this would need to be designed appropriately with the existing landscape character and Green Belt. For example, further clarification is sought and concerns raised on the possible future use of the Ferry Lane area, which should be appropriate to the Green Belt.

## **4.6 Socio-economics**

### **Economic Viability**

- 4.6.1 The RTS has the potential to generate a number of economic benefits. Such benefits should be clearly demonstrated, highlighting the net additional benefits that the RTS will deliver from those which already exist in the area.
- 4.6.2 The economic impact should the RTS not be delivered, should also be clearly reported, to further demonstrate the benefit of the RTS to the local economy.
- 4.6.3 Any impacts, both positive and adverse relating to increased visitor numbers should also be considered.

### **New public areas of green open space**

- 4.6.4 The provision of new public facilities including sports pitches, bike tracks, sculpture trails and spaces for play and performance is welcomed. The facilities proposed by the RTS should be informed by a needs assessment, to ensure that any additional provision addresses any identified local deficits to ensure that the needs of the local community are met.
- 4.6.5 The socio-economic benefits of providing such facilities (and new areas of green open space) should be reported.
- 4.6.6 Any adverse impacts on increased visitor numbers should also be considered.

## 4.7 Transport

### Sustainable travel routes/connection

- 4.7.1 The Project Group supports the provision of sustainable transport routes as part of the RTS, such as a public footpath routes running alongside the proposed channel. The Project Group are keen for the Applicant to consider a footbridge over the River Thames at Lower Sunbury as a component of active travel improvements, given existing community support for.
- 4.7.2 The Surrey County Council Local Transport Plan 4 (LTP4) was approved in July 2022 and sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. The commitment to support delivery of improved active travel networks through the scheme is in line with the aspirations of LTP4.
- 4.7.3 At a district and borough level, work is underway to develop Local Cycling and Walking Infrastructure Plans (LCWIPs). LCWIPs are currently being developed in Elmbridge, Spelthorne and Runnymede. They are the best practice approach nationally for planning walking and cycling improvements and seek to prioritise where investment should take place. Development of sustainable travel routes through the RTS should take the LCWIP work already underway into account. Best practice for designing cycling infrastructure is set out in LTN1/20, the government's guide for designing cycling infrastructure.

### Construction movements

- 4.7.4 With regard to the excavation and transportation of material, it is noted that by applying the waste hierarchy the Applicant proposes to minimise the amount of material that is required to come on-site as well as material that needs to be taken off site to landfill. This is welcomed and further information is sought on potential HGV numbers/movements. However, there are still concerns about the principle of transporting and depositing inert material from Elmbridge to Spelthorne and the consequent level of lorry movements.
- 4.7.5 The Project Group encourages the use of the river for transportation of material during the construction, however, the location of jetties for barge loading is a potential concern due to the noisy nature of this activity. The potential impact on existing residential properties needs to be fully understood and considered.
- 4.7.6 There is no information on how connectivity with the river will be maintained during the works, whilst it is recognised that the RTS seeks to enhance this, the construction programme is lengthy and there could be negative impacts on active travel and leisure through reduced access to land and existing footpaths or river frontage.

## 4.8 Heritage and Archaeology

### New public areas of open green space/Education Areas

- 4.8.1 The RTS runs through a landscape which previous investigations have demonstrated has a high potential to contain significant archaeological and paleoenvironmental deposits, particularly from the prehistoric and medieval periods. There is very limited reference to heritage considerations within the Consultation, however the Project Group is aware that a comprehensive suite of investigations has already been carried out during the planning for the project since 2016. This includes desk based research, geophysical and LIDAR survey and geoarchaeological and archaeological evaluation. This work has produced a good understanding of the likely impact of the proposals on below ground deposits and has enabled areas of particular sensitivity to be identified and evaluation strategies designed accordingly, which should be shared with stakeholders. Some areas have not been subject to physical investigation due to logistical reasons and some further work remains to be carried out.

- 4.8.2 It is noted that proposals for the location and nature of proposed habitat creation areas are still at an early stage of design and further engagement will follow.

## **4.9 Biodiversity**

### **Lowering the riverbed from Desborough Cut**

- 4.9.1 The existing Desborough Cut channel is uniform and heavily modified, any further deepening won't be impacting any natural channel bed formation but rather a trapezoidal channel design with minimal bed variability. However, there is a risk of disturbance of fine sediment resulting in the mobilisation of silts which could lead to water quality impacts, if not managed appropriately.
- 4.9.2 A comprehensive package of pollution prevention measures would be required to avoid accidental pollution events during works, and to minimise silt pollution to the River Thames. Measures could include source control, settlement tanks, silt fencing, and dust suppression. Works to the River Thames should be carried out in accordance with Construction Industry Research and Information Association (CIRIA) guidance, in particular C532 Control of water pollution from construction sites, C650 Environmental Good Practice on Site, and CIRIA C648 Control of water pollution from linear construction projects.
- 4.9.3 Works should be undertaken in consultation with the EA and in accordance with any restrictions on in-river working to avoid sensitive periods for fish passage or spawning. In particular the Applicant should also consider the timing of the deepening of the channel to avoid sensitive coarse fish spawning season (March – mid-July) and the risk of direct impact on depressed river mussel. The areas should be surveyed, and appropriate mitigation developed to avoid impacts within the zone of influence of the works.
- 4.9.4 Consideration should be made to the functionality of the upstream reaches which may change as a result of increased capacity, as well as consideration of sediment movement and deposition in low flow conditions which may refill the deepened sections over time. Specialised contractors will be required to complete the dredging works and consultation with the EA should be sought with regard to design, mitigation and management of dredged material.

### **New Public Areas of open green space/Education Areas**

- 4.9.5 Whilst the provision of new public open space and education areas is welcomed, it is important that the RTS considers potential adverse effects from increasing public access and associated recreational activities.
- 4.9.6 A number of the waterbodies within the study area support overwintering birds associated with the Southwest London Water Bodies Special Protection Area (SPA). Dependent on their level of usage by the birds, these waterbodies may be considered Functionally Linked to the SPA as they support the functionality and integrity of the SPA. There is a requirement for competent authorities (the Planning Inspectorate) to consider the importance of functionally linked habitats in Habitats Regulation Assessments (HRAs) when assessing new plans or projects to ensure the Conservation Objectives for the site can still be delivered. As such the RTS will need to fully consider potential effects to South West London Waterbodies SPA from the proposed new public open space and education areas and associated recreational activities.
- 4.9.7 In addition, the RTS will need to fully consider potential adverse effects from increasing public access and associated recreational activities to other sensitive habitats and species. For instance, sensitive habitats such as unimproved hay meadows and open mosaic habitat (OMH) could be affected by trampling or nutrient impacts from dog faeces. Species such as otter and some breeding bird species are likely to be sensitive to elevated levels of noise and visual disturbance.



- 4.9.8 Increased recreation could also result in higher risk of impacts to sensitive habitats and species through the import of invasive non-native species (INNS), which are present in this stretch of the River Thames. Species such as *Crassula helmsii* could be transported between waterbodies through movement of people, pets (e.g. dogs), or equipment (e.g. paddleboards).
- 4.9.9 The proposed lakes along the RTS are designated as Site of Nature Conservation Importance (SNCI) and their value to wildlife would potentially be impacted by changes to the ecology brought about by the introduction of INNS. Robust mitigation measures will need to be provided to prevent changes to the lake ecosystems which may stop the lakes being used by the overwintering birds for which the SNCIs are primarily valued.

#### Suitable Accessible Natural Greenspace (SANG)

- 4.9.10 The Consultation brochure sets out that, 'Alongside the channel there will be opportunities to create recreational spaces for the community'. There is an opportunity for a new SANG to be delivered as part of the RTS as part of the recreational offer. An ongoing supply of SANG land will enable the Project Group to continue to support new housing development in the County, due to the proximity of the Thames Basin Heaths Special Protection Area (TBHSPA) which forms part of the National Site Network, and which is afforded the highest level of habitat protection against harm arising from development and other actions.
- 4.9.11 Runnymede Borough Council have provided a briefing note (see **Appendix A**) which provides more information about the TBHSPA and SANG, where it is believed a SANG could be located within the RTS and the benefits of providing a SANG.
- 4.9.12 Consideration would need to be given as to whether any SANG provisions would be part of the BNG solution for the scheme or in addition to it.

#### Habitat Creation

- 4.9.13 The inclusion of significant areas of habitat creation is welcomed and will assist the RTS in meeting national targets for biodiversity recovery and legal and planning requirements around biodiversity net gain (BNG). However, the Consultation does not explicitly include reference to BNG.
- 4.9.14 The type of habitats provided should be guided by the local context (i.e. the existing habitats and species present in the local area), and by regional and local priorities set out in Local Biodiversity Action Plans or similar. Species provided should be of native origin and be resilient to likely changes associated with climate change.
- 4.9.15 Habitat creation areas should be designed with regard to standard industry guidance, in particular: *Biodiversity Net Gain. Good practice principles for development. A practical guide* (2019).
- 4.9.16 In areas where both habitat creation and open space provision are proposed, consideration will need to be given to the potential for negative effects to habitats from recreational use of these areas. In particular, nutrient impacts from dog faeces, trampling of vegetation by people, and burning of vegetation and soils through the use of BBQs can all have detrimental effects.
- 4.9.17 Furthermore, clarification is sought if the BNG provisions will serve only the RTS or if a surplus will be provided for allowing developers to make a financial contribution to deliver part of the BNG improvements associated with the RTS.
- 4.9.18 In addition to habitat creation areas, it is recommended that the RTS also considers enhancement of existing habitats within the project boundary. This could include vegetation management, removal of INNS, strategic management to reduce recreational impact. Habitats to be created should be subject to long-term monitoring and management to ensure they meet their design parameters.

### **Severance**

- 4.9.19 The RTS has the potential to result in severance of terrestrial habitats, creating an island sandwiched between the RTS and the River Thames. The only way to move from this island onto land will be via roads and bridges. This will potentially force terrestrial animals whose territories and foraging routes are now bisected by the channel to use the roads and could lead to increased mortality from vehicle collisions. It is recommended that consideration be given to construction of green bridges or other engineering solutions to facilitate animal movement through the landscape away from roads and road bridges. Careful consideration and design should be given to terrestrial fauna navigation routes.

## **4.10 Health and Social Value**

### **New public green space areas**

- 4.10.1 In addition to the welcome focus on open space to support physical activity, the Consultation brochure would benefit from framing provision and access to new green open space primarily as an opportunity to improve physical, mental health and wellbeing. Re-framing open spaces through a health lens will align the RTS closer to the strategic priorities outlined in Spelthorne, Runneymede and Elmbridge councils' Health and Wellbeing strategies, which are more widely informed by Surrey County Council's Health and Wellbeing strategy. These strategies frame open space as enabling greater physical activity, improving mental health outcomes, and acting as a wider determinant of health.
- 4.10.2 We recommend that the RTS expands its focus beyond the provision of 'leisure activities' in open spaces to embrace a wider range of activities that would capture the attention of people not willing or able to be engaged in physical activities. Health benefits can also arise from using open spaces in other ways e.g., being in the space, through art and culture, or as an informal place to gather. This is particularly important for ensuring the RTS reaches out and is inclusive of as many people as possible. In addition, Surrey's and Spelthorne's Health and Wellbeing Strategies supports social prescribing. It would be helpful to explore with the public how open space can act as a platform to deliver social prescribing.

### **New habitats**

- 4.10.3 Whilst the creation and improvement of natural habitats is a key objective of the RTS, the Project Group recommend integrating this with individual and community health and wellbeing, by involving communities in long-term habitat management and maintenance. Suggested activities include gardening, food growing, and wildlife education. Integrating communities with the local environment has potential to further improve physical and mental health and conserve the ecosystem. This recommendation would be dependent on whether the Applicant is willing to offer up opportunities for the public to be involved in maintenance and management. It would be prudent to consult communities and local wildlife groups on this.

### **Construction compounds**

- 4.10.4 There is no information provided on location of construction compounds to enable sustainable construction methods to occur as stated in the Consultation brochure. Construction compounds has the potential to give rise to health and well-being impacts relating to increased levels of lighting, noise, air quality and traffic implications.

## **4.11 Noise and Vibration**

- 4.11.1 It is noted within the Consultation brochure that more information on noise and vibration impacts will be provided in the next consultation.



- 4.11.2 To be able to consider and comment on potential noise impacts, details on construction and operational noise and vibration, impacts should be provided, along with any mitigation which is necessary.
- 4.11.3 The commitment to sustainable construction including the use of existing materials as far as possible, reducing the amount of material needed to be brought onto site and removed from the site is noted, and it is acknowledged that this should reduce the impact of noise in terms of reduced vehicle movements.
- 4.11.4 In relation to noisy works, the need for continuous construction noise monitoring should be discussed and agreed with the relevant Local Planning Authority, including works associated with barge movements/deliveries.
- 4.11.5 Operational noise impacts expected to be assessed and mitigated where necessary, include change in noise associated with water flow, the suitability of new amenity areas with respect to noise from new and existing sound sources, and noise impact from new amenity uses.
- 4.11.6 The use of sound survey data obtained during the Covid lockdown should not be used as this would provide an unrealistic baseline.

## **4.12 Air Quality**

- 4.12.1 It is noted in the Consultation brochure that more information on air quality impacts will be provided at the next consultation.
- 4.12.2 It is welcomed that one of the aims of the RTS is to create more sustainable travel network to link communities and increase access to open space for leisure, recreation, and active travel away from the busy road network which will encourage use of sustainable transport modes, thereby working towards reducing road traffic emissions.
- 4.12.3 In addition, it is welcomed that the waste hierarchy will be applied to reduce the amount of material waste from the RTS through the reuse of material on-site where possible. This in-turn will help to reduce the number of vehicle movements generated by the RTS during the construction phase.
- 4.12.4 The Applicant is encouraged to consider other ways to further reduce construction vehicle emissions such as using low emissions plant and vehicles where practicable and considering the routing of vehicles away from areas of poor air quality, placement of construction compounds and site access points in locations that minimise the impacts on local air quality, and route planning and optimisation such as routing strategies so that persistent impacts on the same stretches of road or road junctions are reduced.
- 4.12.5 The impact of road traffic emissions during the construction of the RTS will be a key issue. There are areas of known congestion and traffic-related air quality issues where construction traffic may travel, for example Walton Bridge / A244, Hampton Court Bridge / A309 and the A317 through Weybridge. In addition, the impact of road traffic emissions resulting from the RTS at the strategic road junctions (such as Sunbury Cross) are a concern especially where there may be cumulative impacts with other construction works and mineral extraction / landfill traffic locally. If possible, direct access from the M3 to a scheme compound should be considered as this would be beneficial in reducing air quality impacts at receptor locations where pollutant concentrations are already high.
- 4.12.6 Proposed leisure facilities, visitor centres and/or riverside businesses such as cafés may attract traffic, and this should be considered within the air quality assessment. Suitable EV charging infrastructure should be planned for parking and servicing areas to ensure that low emission

vehicles are accommodated. Supporting businesses that hire equipment for leisure such as paddle boards, canoes, fishing equipment and bicycles use would potentially reduce the need for people to access the leisure areas by car.

- 4.12.7 Tree planting and woodland improvement is welcomed and would help to maintain air quality benefits.

### 4.13 Climate

- 4.13.1 Section 1.3 (page 11 of the Consultation brochure) states that the challenges of flooding are forecast to increase with climate change. It also mentions properties being flooded in 2014. It should be noted that climate change is already causing impacts, and this includes more recent extreme rainfall events that followed a period of drought, leading to flooding this summer/autumn across the country. Without this context there is a risk that the importance of the RTS is underplayed or worse, that climate change is a phenomenon being seen as something in the future not something that is already happening.
- 4.13.2 In Section 4 of the Consultation brochure, the topics to be included within the Environmental Statement are listed, however climate change has been excluded. The Project Group would expect to see climate change feature in the EIA for the scheme, not least because it should result in significant beneficial effects in terms of climate change adaptation. We acknowledge that in the EIA Scoping Report for the scheme that climate change has been scoped in.
- 4.13.3 Section 4.3 of the Consultation brochure *“by applying the hierarchy, we will minimise the amount of material that needs to come on-site, as well as materials that need to be taken offsite to landfill. This will help to reduce construction traffic, air quality and noise impact, and reduce our carbon footprint”*. There is no other reference to the potential lifecycle carbon impact of the scheme. Reducing waste and embodied carbon in materials will assist to reduce the negative effects and is likely to be an important part of the climate change impact assessment. Carbon emissions from other sources should also be assessed and mitigated.
- 4.13.4 The RTS has an opportunity to consider climate change in habitat creation proposals to maximise carbon sequestration and to provide resilient habitats and landscaping. Further opportunities to reduce emissions should be identified at early design stages and should include, for example, selection of materials with less embodied carbon, sourcing local materials, construction practices that reduce reliance on diesel plant and equipment.

## 5 Summary and Next Steps

### 5.1 Summary

- 5.1.1 The Consultation seeks opinions regarding the RTS proposals to lower the riverbed downstream of the Desborough Cut, the provision of a more sustainable travel network, better access to open green spaces, and improved connections to wildlife and habitat quality. However, there is a lack of detail for stakeholders to review design and provide feedback. The Consultation should have provided greater detail on the design of the public provisions.
- 5.1.2 There is also a lack of clarity about the scheme proposed and no clear position on matters such as the proposed landscape strategy and if proposed beacons/ mounds will still form part of the proposed scheme. These are key elements of the scheme where community engagement and involvement are required yet this Consultation does not appear to deal or address this. It is understood that further information will follow as part of a series of technical workshops with statutory stakeholders and a Statutory Consultation will be held toward the end of 2023. There is a concern that stakeholder will be overloaded with information at the Statutory Consultation in 2023 and have limited time to influence proposals.

#### Principle areas of environmental concern

- The Project Group has concerns regarding the channel going through landfill sites. There is no specific information in the Consultation brochure as to which landfills would be impacted and how the Applicant will protect the rest of the landfill, the water channel and the environment.
- Where excavated landfill material is intended for re-use within the scheme, assessment of the risks to human health and livestock is required, as well as the potential impacts of this re-use on groundwater and surface water quality. Additionally, the methods of assessing excavated waste material for suitability for re-use (geochemically and geotechnically) should be provided.
- The movement and management of material is key to understanding the potential environmental impacts for transport, air quality, noise, climate and waste. Further information is required on construction logistics (i.e. barge movements) of material movement and re-use.
- The impact of road traffic emissions during the construction of the Scheme will be a key issue. Walton Bridge / A244, Hampton Court Bridge / A309 and the A317 through Weybridge are areas of known congestion and traffic-related air quality issues, where construction traffic may travel. In addition, the impact of road traffic emissions resulting from the RTS at the strategic road junctions are a concern especially where there are cumulative impacts. Direct access from the M3 to a scheme compound should be considered to reduce air quality impacts at receptor locations where pollutant concentrations are already high.
- The constant supply of water to the reach will allow flow variation and different sediment processes to occur within the channel; which will help control fine sediment distribution through the scheme. Therefore, it is necessary to ensure that the non-flood water levels are high enough to maintain a flow through the scheme and prevent stagnation of water to occur.
- The proposed scheme will be located in an area that is predominantly rural and flat in profile. The previous consultation proposed beacon style hills up to 15m in height. It is understood from the Consultation that the Applicant intends to re-use excavated material for the habitat creation areas. Further clarification is sought on the quantum/volume of material to be removed and where /what implications this has for the landscaping design. There is a lack

of detail about the quantity of material being deposited within the County and the consequence of this on the landscape environment. The Project Group are concerned with regards to the potential design of the habitat creation areas and how these will be integrated into the surrounding area.

- In areas where both habitat creation and open space provision are proposed, consideration will need to be given to the potential for negative effects to habitats from recreational use of these areas. In particular, nutrient impacts from dog faeces, trampling of vegetation by people, and burning of vegetation and soils through the use of BBQs can all have detrimental effects.
- Due to the potential increase in visitor numbers to the area as a result of the RTS and the potential pressure this may have on the TBSPA, there is an opportunity for a new SANG to be delivered as part of the RTS as part of the recreational offer.

## 5.2 Next Steps and Recommendations

5.2.1 Further engagement and technical workshops are recommended with the Project Group to inform on-going design work for the RTS. The Project Group recommend the following:

- Whilst the creation and improvement of natural habitats is a key objective of the RTS, the Project Group recommend integrating this with individual and community health and wellbeing, by involving communities in long-term habitat management and maintenance. The Project Group recommends that further information/engagement is undertaken with the local community to gain local 'by-in' of the scheme design relating to the public amenity provisions.
- It is recommended that consideration be given to construction of green bridges or other engineering solutions to facilitate animal movement through the landscape away from roads and road bridges. Careful consideration and design should be given to terrestrial fauna navigation routes.
- In addition to habitat creation areas, it is recommended that the RTS also considers enhancement of existing habitats within the project boundary. This could include vegetation management, removal of INNS, strategic management to reduce recreational impact.
- We recommend that the RTS expands its focus beyond the provision of 'leisure activities' in open spaces to embrace a wider range of activities that would capture the attention of people not willing or able to be engaged in physical activities. This is particularly important for ensuring the RTS reaches out and is inclusive of as many people as possible.
- Development of sustainable travel routes through the RTS should take LCWIP work already underway into account. Additionally, more information should be provided on how active travel networks will be incorporated and implemented into the scheme. The Project Group would also request a footbridge to be provided over the River Thames at Lower Sunbury.
- The Applicant should also consider the timing of the deepening of the channel to avoid sensitive coarse fish spawning season (March – mid-July) and the risk of direct impact on depressed river mussel. Consideration should be made to the functionality of the upstream reaches which may change as a result of increased capacity, as well as consideration of sediment movement and deposition in low flow conditions which may refill the deepened sections over time.
- The design of the habitat creation areas should be designed with the community in mind and be a space for the community to enjoy, not just on a physical level but also in terms of place setting and health and wellbeing.

# Appendix A Proposal for use of land associated with the RTS for Suitable Accessible Natural Greenspace

**The following proposal has been put forward by Runnymede Borough Council**

Background

The Thames Basin Heaths Special Protection Area (SPA), including the Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC) is a network of heathland areas stretching across parts of Surrey, Berkshire and Hampshire. The SPA (& SAC) forms part of the National Site Network which is afforded the highest level of habitat protection against harm arising from development and other actions.

The closest areas of SPA (& SAC) to Runnymede are at Chobham Common which abuts the Borough's western boundary and Horsell Common just to the south. From 2005 onwards, mitigation for the increase in visitor numbers on the SPA/SAC and urbanisation arising from residential development has been required.

In this respect, Natural England advises that no net additional residential units should be granted planning permission within 400m of the SPA/SAC, mitigation in the form of SANG at 8ha per 1,000 population is required for development within a 400m-5km radius and SANG at 2ha per 1,000 population is required for net residential development of 50+ units within a 5km-7km radius.

The majority of Runnymede Borough lies within the 400m-5km zone of influence, with areas in the north of the Borough within the 5-7km zone. A small proportion of the Borough at Longcross is within 400m of the SPA/SAC and a small proportion at the northern edge of the Borough is outside any zone of influence.

SANG can either be provided by the local authority (using its own land or through CPO) or through third parties who bring forward bespoke SANG to mitigate their particular development. The majority of SANG in Runnymede have been brought forward by the Borough Council on land within its ownership. For this type of SANG, the Borough Council carry out works to bring the land up to SANG standard (see below) and then manage/maintain in perpetuity. The costs associated with this are passed on to developers who make financial contributions to the Borough Council on a per occupant (net) basis through S106 agreements.

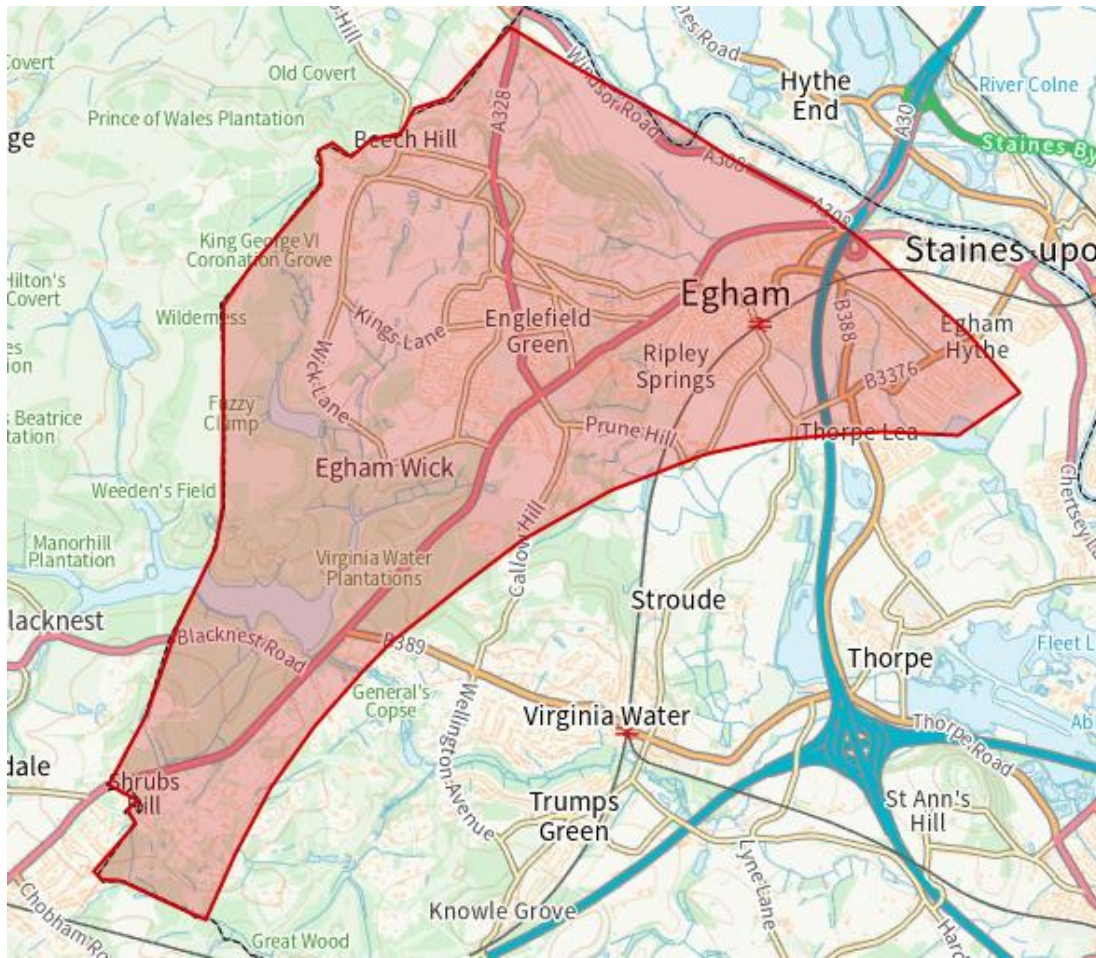
Developments of 9 net additional units can be assigned to any SANG within the Borough, however developments of 10+ net additional dwellings must be assigned to a specific SANG and be within that SANG's catchment area (see below).

Current SANG Capacity in Runnymede

Runnymede Borough Council currently manages 6 SANG sites. As at July 2022, the remaining SANG capacity of all 6 sites is 2,578 occupants or around 1,050 dwellings. However, of the 6 SANG sites, only the SANG at St Ann's Hill has a catchment which includes the north area of the Borough either within the 400m-5km zone or the 5-7km zone. As such, when capacity at St Ann's Hill SANG runs out there will be no effective mitigation for development within the north of the Borough. The map below shows the extent of Runnymede's SANG catchments and SPA zones of influence.

The current capacity at St Ann's Hill SANG is 130 occupants (around 50 units). When this runs out, as can be seen in the map below, this effectively means that a large part of Egham Hythe, land west of the M25 including Egham town centre and the whole of Englefield Green would have no SANG mitigation, effectively barring housing development of 50+ units in Egham and 10+ units in the south of Englefield Green (area shaded red on the map).





#### The Need for Additional SANG Capacity

Runnymede does not have sufficient SANG to implement all development allocated in the Runnymede 2030 Local Plan. This was acknowledged during the Local Plan Examination in Public (EiP) and the Plan was still found to be sound on the basis of there being a reasonable prospect that additional SANG would be found over the plan period. Without additional SANG, particularly to cover the north of the Borough, allocation sites at Blay's House, Englefield Green and Thorpe Lea Road North, Egham would be at risk. If the Egham Gateway East allocation and Egham Library Opportunity Area proposed 50 or more units these would also be at risk.

In addition, based on the Government's Standard methodology for calculating housing need, over the next plan period (most likely to be 2026-2041), the Council should be seeking to accommodate 8,235 dwellings. Assuming three quarters of this comes forward in the 400m-5km zone and one quarter in the 5-7km zone this would give an estimated SANG capacity requirement between 2025 – 2040 of around 134ha. This would be in addition to any residual requirement for the 2030 Local Plan estimated at 30ha<sup>1</sup>. As such, there is an estimated additional requirement of 164ha to 2040.

Existing SANG capacity at July 2022 is 2,578 occupants or around 20.5ha<sup>2</sup>. Potential new SANG, their capacity and catchments are also identified at the following locations:

30ha at the Longcross Garden Village site – catchment will only serve Longcross.

11.5ha (Hardwick Lane) – 4km catchment covering Addlestone (including Rowtown), Chertsey, Lyne, Longcross, Ottershaw, Thorpe & Thorpe Lea, Virginia Water

Even with these additional SANG factored in, a high level estimate is that 102ha of SANG still needs to be identified to support growth up to 2040.

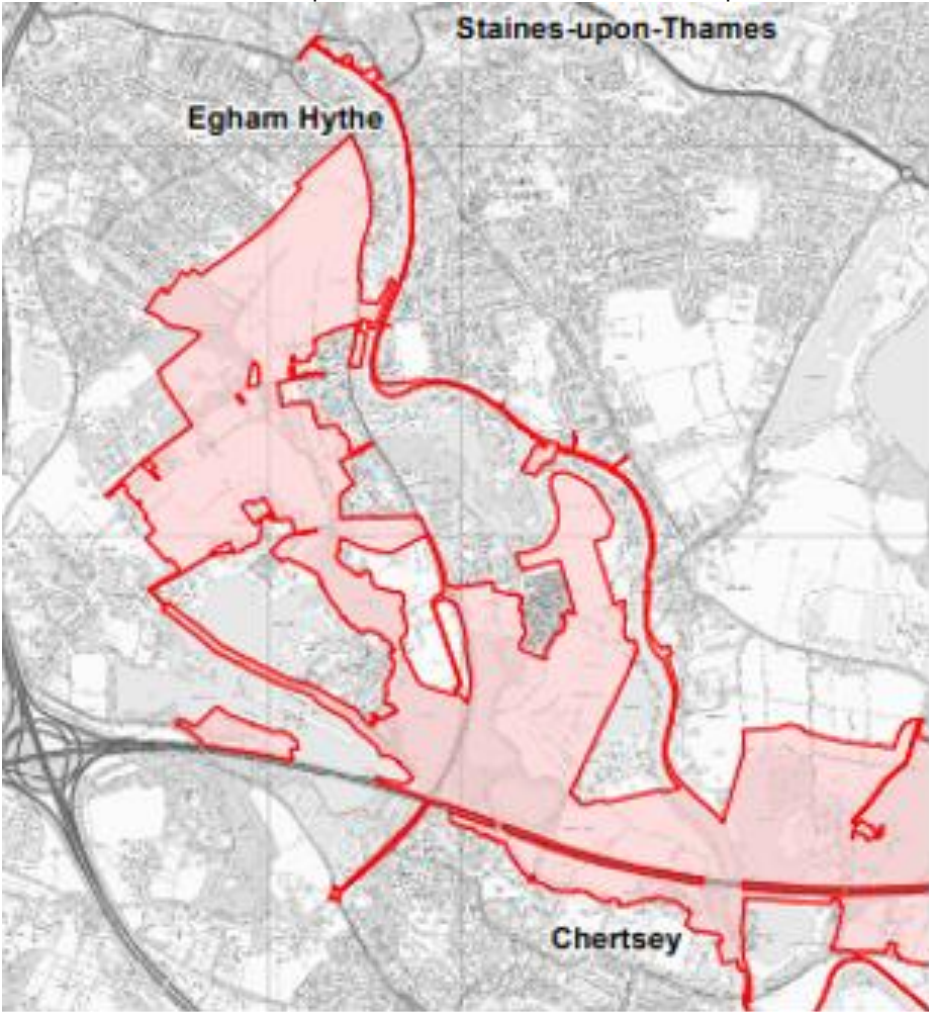
---

<sup>1</sup> Based on 3 years of 2030 Local Plan annual requirement (2022-2024) at 500dpa = 1,500 dwellings or 3,750 occupants (using Census 2011 occupancy ratio for Runnymede of 2.5) and 8ha per 1,000 occupant standard.

<sup>2</sup> Assuming an 8ha per 1,000 standard given the limited capacity at St Anns Hill SANG.

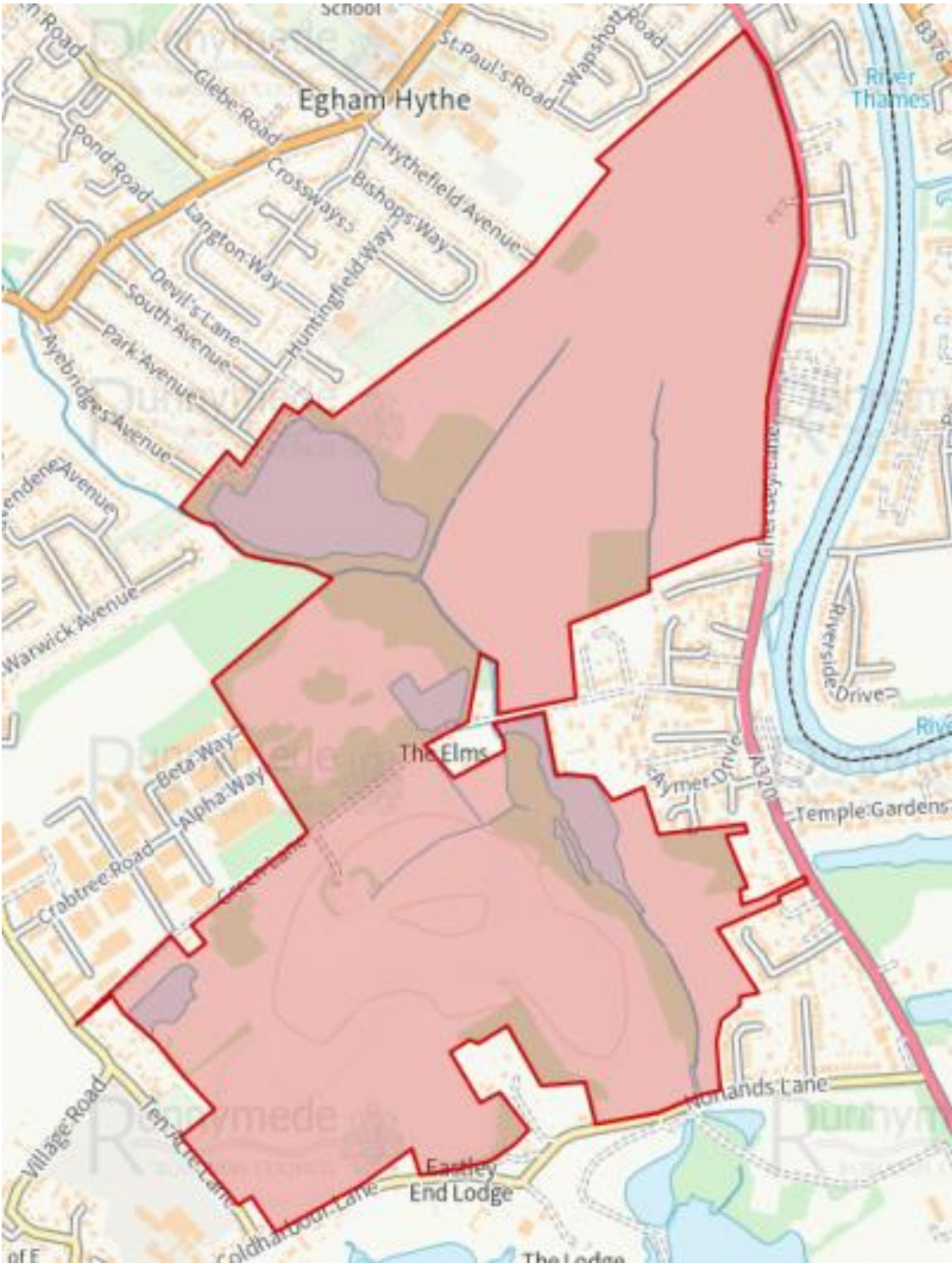
RTS as an opportunity for SANG

Current estimated land requirement for RTS set out in the map below.



This includes a substantial amount of land that could (subject to Natural England agreement) be used as SANG, particularly an area to the south of Egham and east of Thorpe as shown in the map below. This area covers approx. 112ha (discounting the area for the RTS channel itself and the Thorpe Hay Meadow SSSI). Whilst it is acknowledged that competing uses for this land may be proposed (such as sports pitches, open space etc), it could still be possible to deliver these alongside a substantial area of SANG which would go a long way to ensuring sufficient SANG capacity to 2040 for the Borough and also cover an area of the Borough where only limited SANG capacity remains.





Natural England have provided guidance on the different elements required to make a SANG. These are set out in Appendix 5 of the Runnymede Thames Basin Heaths SPA SPD<sup>3</sup>. To summarise, there are a number of elements that a SANG must have, the most relevant includes a 2.5km circular walk, adequate public car parking, must be perceived as semi-natural, SANG over 12ha to provide a variety of habitats, unrestricted access to dogs and dog walkers and be free from unpleasant intrusions.

---

<sup>3</sup> [Supplementary Planning documents and other guidance – Runnymede Borough Council](#)



Other desirable features for SANG include linking to longer 5km walks, gently undulating topography, provide areas of open (non-wooded) countryside, areas of dense & scattered trees/scrub and open water, larger SANG to have 5km circular walks.

It is considered that the land associated with the RTS and shown in the map above is capable of achieving all of the SANG 'must have' criteria and many of the desirable criteria.

Natural England also set out guidance for the extent of SANG catchments based on the size of the SANG. SANGs of 2-12ha in area have a catchment of 2km, for those between 12-20ha this rises to 4km, and SANG of 20+ha have a catchment of 5km. The RTS has the ability to deliver an area of SANG greater than 20ha and as such would have a 5km catchment. This would cover development in Egham, Chertsey, Englefield Green, Thorpe, Virginia Water and potentially parts of Addlestone.

#### Other Benefits

SANG would achieve a multi-functional role including a number of other benefits on top of TBH mitigation, such as:

- Creation of a large accessible space of natural/semi-natural habitat with potential to link to wider strategic green & blue infrastructure network i.e. River Thames, Colne Valley Regional Park, Runnymede Meadows
- High potential for Biodiversity Net Gain (BNG) including enhancement of priority habitat (deciduous woodland and lowland meadow) and helping to deliver Thames Valley Biodiversity Opportunity Area (BOA) (Unit TV04 Thorpe & Shepperton) objectives and targets which include:
  - Priority habitat restoration and creation which includes:
    - Standing open water
    - Floodplain grazing marsh
    - Acid grassland
    - Wet woodland
    - Reedbeds
  - Priority species recovery which includes: by 2020 evidence of at least stabilisation and preferably recovery in the local populations of listed priority species including:
    - Greater water parsnip<sup>4</sup>
    - Marsh stitchwort<sup>3</sup>
    - Lapwing
    - Watervole<sup>3</sup>
- Helping to deliver climate change mitigation through carbon sequestration in natural environment/habitat creation

#### Conclusion

The delivery of SANG within the RTS has the potential to make a substantial contribution to the delivery and implementation of the Runnymede 2040 Local Plan. At the same time as helping to deliver Local Plan growth aspirations it can also fulfil a multi-functional role in delivering accessibility and connectivity to the Runnymede and wider GBI network, help deliver BNG and BOA objectives/targets as well as help to achieve climate change mitigation through carbon sequestration.

---

<sup>4</sup> Noted as probably extinct within the BOA area.

This page is intentionally left blank

# Community Wellbeing & Housing Committee



Tuesday 17th January 2023

<b>Title</b>	Housing Register Applications by Housing Register Banding and Calculated Bedroom Need
<b>Purpose of the report</b>	To note
<b>Report Author</b>	Karen Sinclair Group Head Community Wellbeing Ken Emerson Team Manager: Housing Options
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	Not applicable
<b>Corporate Priority</b>	Community Affordable housing Service delivery
<b>Recommendations</b>	<b>Committee is asked to:</b> Not applicable – For information only
<b>Reason for Recommendation</b>	Not applicable

## 1. Summary of the Report

- 1.1 This report summarises the number of applicants on the Housing Register by their Housing Register Banding and calculated bedroom need.
- 1.2 Members have approved a New Allocations Scheme which will be implemented in April 2023 following a re-registration exercise. This will ensure the Register is fully up to date

## 2. Background

- 2.1 By law every Local Authority has to have a scheme to show how social housing is allocated. There is no legal right to housing but eligible households are able to join Spelthorne's Housing Register and have an assessment of their circumstances.
- 2.2 The Council operate a Housing Register not a waiting list. Priority is determined by need and there is a banding system in place. Customers accepted onto the Housing Register bid for properties, which are advertised online through Search Moves. Should more than one customer in the same band be shortlisted then a priority date is applied.
- 2.3 Transparency and self-service are key elements of the Allocations Scheme. Having a web-based application form and bidding system means that customers can see how many properties are available to bid on and their relative priority.

2.4 The Housing Register is a live document, and the numbers can change rapidly as can a customer's relative position.

### 3. Key Issues

3.1 The below table shows the number of applicants on the Housing Register by their Housing Register Banding and calculated bedroom need.

3.2 Interpreting the data. It might appear counter intuitive, but a higher banding does not confer a sense of immediacy to a household's need. Some of the cases of Band A are existing social tenants living in property that is too large and they wish to downsize. We prioritise them to free up family size accommodation for those who need it. Other Band A clients may include for example be wheelchair users living on the second floor of a block of flats with no lift.

3.3 Similarly in Band D there are households in need but because their income is above the qualifying threshold, they are demoted to Band D. Our new Allocations scheme has a higher income threshold to rectify this. We anticipate as a result up to 261 households currently excluded due to income may have a higher banding.

Housing Register Applications by Banding and Calculated Bedroom Need							
Housing Register Banding	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom	Grand Total
Band A1	30	1	2	0	0	0	33
Band A2	4	0	1	0	1	0	6
Band B1	190	255	56	8	3	0	512
Band B2	30	22	31	13	3	1	100
Band C1	328	239	133	35	1	0	736
Band C2	72	138	144	28	2	0	384
Band D	1,048	578	172	13	3	0	1,814
<b>Grand Total</b>	<b>1,702</b>	<b>1,233</b>	<b>539</b>	<b>97</b>	<b>13</b>	<b>1</b>	<b>3,585</b>

### 4. Housing Register Banding

All applications are assessed and awarded a Band to reflect the level of need of the applicant and local connection. There are seven bands:

- Band A1 – Emergency / Priority (excluding transfer cases)
- Band A1 – Emergency / Priority – transfer cases
- Band B1 – Urgent need to move (excluding transfer cases)
- Band B1 – Urgent need to move – transfer cases
- Band C1 – Identified need to move – all applications including transfer cases
- Band C2 – Cases with a reasonable preference need but no local connection
- Band D – Low housing need and no 'deemed' housing need

4.1 A detailed list of the factors taken into account when awarding these Bands is set out in Appendix 1 of the Housing Allocations Policy. (attached in Appendix C with calculated need)

4.2 For Bands A1 – C2, transfer cases, where the applicant has previously been housed but now needs to move due to a change of circumstances, they have a lower priority than new applicants.

4.3 All Band A cases are reviewed on a six-monthly basis.

## 5. Case Study A

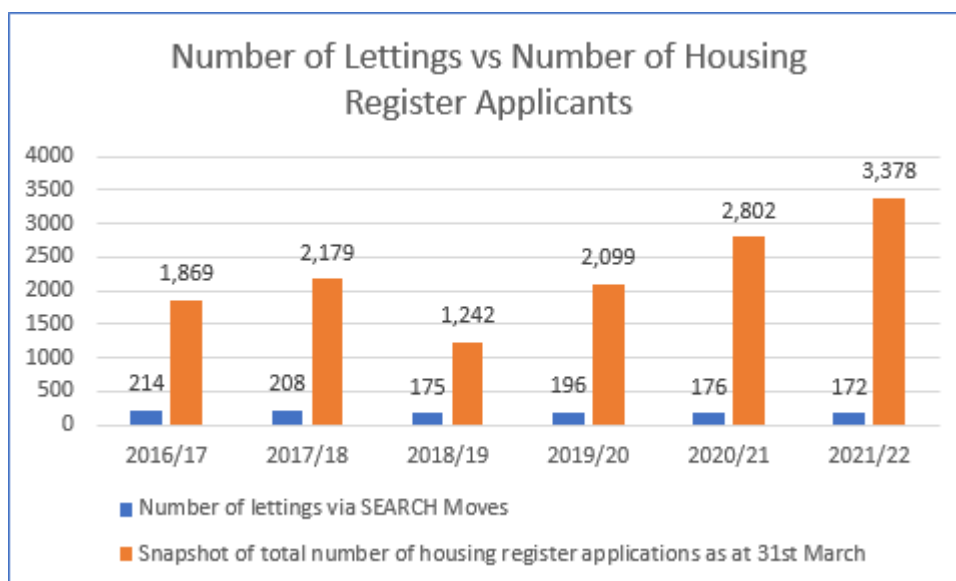
5.1 Customer A has worked for the NHS for many years. They were able to secure their home through the shared ownership scheme. Due to health issues, they were medically retired and now require a wheelchair. As a result the home is no longer suitable and they have a Band B1 on our Housing Register. As the property was bought as shared ownership there is insufficient equity for them to buy somewhere else. They are bidding for properties but the prospective landlord has rejected them as a tenant because they have an interest in the property.

## 6. Case Study B

6.1 Customer B is a young adult who lived with her parents on the first floor of a block of flats. She developed bone cancer and became an amputee and now requires a wheelchair. Because her parents' property was no longer suitable she became homeless and is now in our temporary accommodation. Although she is in a Band B, she has been there over a year and is highly unlikely to be made an offer quickly as many one-bedroom properties cannot be adapted and those which are bungalows or in low density blocks have an age restriction applied on the prospective tenant.

## 7. Demand & Supply Pressures

7.1



7.2 The Housing Register figures give a limited perspective to a complicated picture. There can be no movement without looking at supply issues and other demand issues. The above chart shows how supply has dropped over a 5 year period. A2D our largest provider have 27 new properties becoming available in February 2023. Apart from this there is no new development coming up soon and we will rely on existing properties being re-let and Knowle Green properties

- 7.3 In the last year we prevented 250 households from becoming homeless. Many of these were through accessing the private rented sector. There is a huge amount of uncertainty in the sector as a result of mortgage rate increases, changes in taxation and legal reforms around security of tenure. Some landlords are choosing to sell up and leave the sector.
- 7.4 The potential impact is an increase in households we accept the main homeless duty to. We already have the highest numbers of people in Bed & Breakfast in Surrey, and the concern is that this will increase without an adequate supply of new properties.
- 7.5 The Domestic Abuse Act places additional responsibilities on Local Authorities, one of which is that existing social tenants who are the victims of abuse are entitled to social housing if they approach as homeless. This reduces our supply of social housing and limits are options in preventing homelessness.
- 8. Options Analysis and Proposal**
- To continue to provide summary figures for number of applicants on the Housing Register by their Housing Register Banding and calculated bedroom need on a 6-monthly basis via the Council website.
- 9. Financial Implications**
- There are none.
- 10. Risk Considerations**
- Not applicable, the report is for information only.
- 11. Procurement Considerations**
- Not applicable, the report is for information only.
- 12. Legal Considerations**
- Not applicable, the report is for information only.
- 13. Other Considerations**
- No other considerations.
- 14. Equality and Diversity**
- An Equality and Diversity Impact Assessment has been carried out, and this assessment has not identified any significant impact on equalities. There are services and policies to support other groups who may not be able to access services or who have greater difficulty accessing settled housing (e.g., 16 to 17-year-olds, or disabled people).
- 15. Sustainability / Climate Change Implications**
- There are sustainability and climate/change concerns with social housing provision. However, the report itself does not have any impact on the Council's sustainability / climate change position.
- 16. Timetable for Implementation**
- New figures will be run on a 6-monthly basis.
- 17. Contact**
- Housing Strategy and Policy Team: [HousingStrategy@spelthorne.gov.uk](mailto:HousingStrategy@spelthorne.gov.uk).

**18. Background papers: There are none.**

**19. Appendices**

Appendix A – Equality Impact Assessment for Housing Register Banding Report\_22.09.2022

Appendix B - Summary of changes to the Allocations Scheme.

Appendix C – Calculated Need

This page is intentionally left blank



## Equality Analysis

<b>Directorate:</b> Community Wellbeing  <b>Service Area:</b> Housing Strategy & Policy	<b>Lead Officer:</b> Marta Imig  <b>Date completed:</b> 21 October 2022
<b>Service / Function / Policy / Procedure to be assessed:</b>  Housing Register Applications by Housing Register Banding and Calculated Bedroom Need – 22 September 2022	
<b>Is this:</b> New / Proposed <input type="checkbox"/> Existing/Review <input checked="" type="checkbox"/> Changing <input type="checkbox"/>	<b>Review date:</b> The figures are reviewed every 6 months for inclusion on the Spelthorne Borough Council website or otherwise available for information purposes as may be required.

**Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.**

**What are the aims and objectives/purpose of this service, function, policy or procedure?**

The purpose of the report is to summarise the number of applicants on the Housing Register by their Housing Register Banding and calculated bedroom need, to be included on the Spelthorne Borough Council website and otherwise available for information purposes as may be required.

**Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?**

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	✓	
Advancing equality of opportunity	✓	
Fostering good community relations	✓	

**If not relevant to any of the three equality duties and this is agreed by your Head of Service**, the Equality Analysis is now complete - please send a copy to **NAMED OFFICER**. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

## PART B: Full Equality Analysis

### Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

<b>What outcomes are sought and for whom?</b>	The outcome is to ensure that up-to-date figures for the demand for social housing through the Housing Register, banded according to need as per the Council's Housing Allocations Policy, are available for inclusion of the Spelthorne Borough Council website and otherwise for information purposes as may be required.
<b>Are there any associated policies, functions, services or procedures?</b>	Corporate Plan Health & Wellbeing Strategy Local Plan Economic Development Strategy Housing Act 1996 (as amended by various) Housing Strategy Homelessness and Rough Sleeping Strategy
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	Spelthorne Borough Council is reliant on the provision of social housing by registered providers, primarily by A2 Dominion, for the properties available through the Housing Register.

### Step 2 – What does the information you have collected, or that you have available, tell you?

**What evidence/data already exists about the service and its users?** (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

#### General Spelthorne context

According to the Indices of Deprivation 2019, the most deprived borough in Surrey is Spelthorne. Spelthorne has the highest number of lone parent families and the highest level of child poverty in Surrey; it also has the highest under-18 conception rate in the county. That said, residents are largely healthy, with life expectancy for both males and females slightly above the national average.

Spelthorne has a low rate of unemployment: 1.4% of those economically active aged 16 to 64, compared to the South East (2.2%) and UK as a whole (3.5%). Heathrow Airport is a significant local employer, with 8.3% of Spelthorne's working population employed there. Significantly, 21.5% of those in work in Stanwell North are in low level employment compared to an average of 11.6% in Surrey. Average wages are slightly above regional averages at £630 per week for full-time employees.

Whilst house prices remain well above the national average, most residents are owner-occupiers (73%), followed by private rented (13%) and social rented (12%).

We're awaiting the full release of the 2021 census data so existing data is based on the 2011 census. First release of the new census data highlights a population increase in Spelthorne by 7.7%, from around 95,600 in 2011 to 103,000 in 2021. Spelthorne is the 14<sup>th</sup> most densely populated of the South East's 64 local authority areas with 2,295 of residents per square kilometre. Initial data also provides updates to both categories of age and sex as outlined below.

#### Gender / gender identity

Census data from 2021 shows that 50.9% of residents in Spelthorne were female, with the remaining 49.1% being male. There is no data known to be held in relation of other gender identities.

Source: ONS Census, 2021 – Population and household estimates, England and Wales: Census 2021

A White Paper published in December 2018 (Help shape our future: the 2021 Census of population and housing in England and Wales) set out the ONS recommendation for what the census should contain and how it should operate. The White Paper recommended that the census in 2021 include a question about gender identity, asking respondents whether their gender is the same as the sex they were registered as at birth. The question is separate from the question about sex (i.e., whether the respondent is male or female), which is phrased in the same way as previous years. There is currently no official data about the size of the transgender population (the word 'transgender' is used here to describe people whose gender identity does not match the sex they were assigned at birth). The Government Equalities Office (GEO) has said that there may be 200,000 to 500,000 transgender people in the UK, but stresses that we don't know the true population because of the lack of robust data. The ONS has identified user need for official estimates in order to support policy-making and monitor equality duties and has added a voluntary question on gender identity for people age 16 years and over. The 2021 data set has not yet been published by the ONS.

Source: <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8531>

#### Age

Spelthorne has a slightly lower population of under-30s (33%) compared to the rest of the country (36%), and a slightly higher population of 30-69 year olds (53%) compared with the national average of (51%), The number of 70+ is 14%, which is broadly in line with the rest of the nation.

Source: ONCS Census, 2021 – Population and household estimates, England and Wales: Census 2021.

#### Ethnicity

The ethnic make-up of Spelthorne is largely in line with the UK average, although we have more residents who identify as Asian and fewer residents who identify as Black than the national average.

Ethnic group	Spelthorne		Region	UK
	Number	%	%	%
White	83,455	87.3%	90.7%	87.2%
Mixed	2,382	2.5%	1.9%	2.0%

Asian	7,295	7.6%	5.2%	6.9%
Black	1,545	1.6%	1.6%	3.0%
Other	921	1.0%	0.6%	0.9%
Total	95,598	100.0%	100.0%	100.0%

Source: <https://commonslibrary.parliament.uk/home-affairs/communities/demography/constituency-statistics-ethnicity/>

### Disability

As of July 2019 there were around 2,020 PIP claimants in Spelthorne constituency. In comparison, there was an average of 2,500 claimants per constituency across the South East. Within Spelthorne, psychiatric disorders were the most common reason for claiming PIP. They accounted for 37% of awards, compared to 36% in Great Britain. 'Psychiatric disorders' include anxiety and depression, learning disabilities and autism. The second most common reason for awards was musculoskeletal disease (general), which accounted for 17% of awards within the constituency and 21% in Great Britain. Musculoskeletal disease (general) includes osteoarthritis, inflammatory arthritis and chronic pain syndromes.

Source:

<http://data.parliament.uk/resources/constituencystatistics/personal%20independence%20payment/PIP%20claimants%20in%20Spelthorne.pdf>

### Religion

Residents of Spelthorne predominately identify themselves as either Christian or having no religion. There is a smaller Muslim population compared with the national average, but a larger Hindu and Sikh population.

	Constituency		Region	UK
	Number	%	%	%
<b>Has religion</b>	<b>67,392</b>	<b>70.5%</b>	<b>65.0%</b>	<b>66.7%</b>
of which				
Christian	60,954	63.8%	59.8%	58.8%
Muslim	1,808	1.9%	2.3%	4.5%
Hindu	2,332	2.4%	1.1%	1.4%
Buddhist	420	0.4%	0.5%	0.4%
Jewish	206	0.2%	0.2%	0.4%
Sikh	1,325	1.4%	0.6%	0.7%
Other	347	0.4%	0.5%	0.4%
<b>No religion</b>	<b>21,511</b>	<b>22.5%</b>	<b>27.7%</b>	<b>26.1%</b>
<b>Not stated</b>	<b>6,695</b>	<b>7.0%</b>	<b>7.4%</b>	<b>7.2%</b>

Source: <https://commonslibrary.parliament.uk/home-affairs/communities/constituency-data-religion/>

### Sexual orientation

*There is no accurate dataset which can be used to reflect solely Spelthorne. The White Paper recommends asking a new question about sexual orientation. The ONS has identified a user need for better data on sexual orientation – particularly for small areas – to inform policy-making and service provision, as well as monitoring equality duties. The ONS has previously used the Annual Population Survey (APS) to estimate the size of the lesbian, gay and bisexual (LGB) population in the UK. According to these estimates, just over 1 million people identified as LGB in 2016 (around 2% of the population). However, the sample population used in the APS isn't big enough to provide robust estimates of the LGB population in smaller areas.*

Source: <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8531>

### Marriage / Civil Partnership

More people in Spelthorne are married compared to the rest of England and Wales, and fewer people identify as single.

Marital Status	Spelthorne		England and Wales	
All usual residents aged 16+	78,089		45,496,780	
Single (never married or never registered a same-sex civil partnership)	24,562	31%	15,730,275	35%
Married	38,984	50%	21,196,684	47%
In a registered same-sex civil partnership	153	0%	104,942	0%
Separated (but still legally married or still legally in a same-sex civil partnership)	2,042	3%	1,195,882	3%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	6,870	9%	4,099,330	9%
Widowed or surviving partner from a same-sex civil partnership	5,478	7%	3,169,667	7%

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

No, the report is for information purposes only

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

No, the report is for information purposes only

## Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

**Barriers:**

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g. the facilities/premises;
- **Who** provides it, e.g. are staff trained and representative of the local population/users?
- **How** it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g. opening hours?
- **What** is provided, e.g. does the service meet everyone's needs? How do you know?

\* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.

**Solutions:**

What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:

- Other arrangements that can be made to ensure people's diverse needs are met;
- How your actions might help to promote good relations between communities;
- How you might prevent any unintentional future discrimination.

<b>Equality Themes</b>	<b>Barriers/Impacts identified</b>	<b>Solutions (ways in which you could mitigate the impact)</b>
<b>Age</b> (including children, young people and older people)	Young people aged 16-17 cannot hold tenancies and so housing options are severely limited.	Young people aged 16-17 receive enhanced services via the Surrey Joint Protocol. They have access to specialist young peoples' homelessness accommodation.  Families that require additional help are referred to North East Surrey Family Support Team who work with the family as a unit and the children individually

		to understand and address support needs. Safeguarding of children is a priority.
<b>Disability</b> (including carers)	Anecdotally we know that physically disabled people accessing settled accommodation in Spelthorne have much more limited options available to them due to potential property adaption requirements.	The Council is responsible for administering Disabled Facility Grants. Where appropriate and households are allocated properties that do not meet current needs relating to physical disabilities, Disabled Facility Grants or solutions under the principles of the Better Care Fund will be utilised to adapt properties
<b>Gender</b> (men and women)	Within the Housing Allocations Policy, sex is included within the calculation of assessing bedroom need. This is governed by the Governments guidance on calculating bedroom need for benefit entitlement purposes.	The Policy aims to be inclusive as possible for people who identify as non-binary or gender fluid.  Please note data collection through monitoring of outcomes (as mentioned below) for the Council to better understand if there are any differences in success rates between different genders.
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)	Accommodation for people seeking asylum is the responsibility of the Home Office. Provision for pitches for gypsies and travelling showpeople are dealt with under the Local Plan.	N/A
<b>Religion or belief</b> (including people of no religion or belief)	No negative impacts have been identified.	Information is collected on ethnicity and diversity within the Housing Register application forms.  The Council aims to use this data to inform future policy improvements and will be able to determine success rates between different groups, e.g. genders, people of different ethnic origins, etc.
<b>Gender Re-assignment</b> (those that are going through transition: male to female or female to male)	No negative impacts have been identified.	Please note data collection through monitoring of outcomes (as mentioned above) for the Council to better understand if there are any differences in success rates between different genders.
<b>Pregnancy and Maternity</b>	No negative impacts have been identified.	Families that require additional help are referred to North East Surrey Family Support Team who work with the family as a unit and the children individually to understand and address support needs. Safeguarding of children is a priority.



<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	No negative impacts have been identified.	Please note data collection through monitoring of outcomes (as mentioned above) for the Council to better understand if there are any differences in success rates between different genders.
---	---	---

### Step 4 – Changes or mitigating actions proposed or adopted

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?**

There are no changes necessary based on this assessment, but the Banding system will be changed in line with the updated Housing Allocations Policy to include only 5 Bands for the level of need (Bands A1 and A2 will be combined into a single Band A for “Emergency/Priority” need, and Bands B1 and B2 will be combined into a single Band B for “Urgent need to move”).

### Step 5 – Monitoring

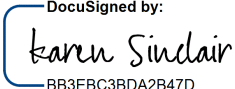
**How are you going to monitor the existing service, function, policy or procedure ?**

The numbers of households on the Housing Register are regularly monitored as part of the existing ongoing regular reporting process, and all households on the Housing Register will be asked to re-apply when the new Homes4Spelthorne Locata system is implemented.

### Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
N/A	N/A	N/A	N/A

### Equality Analysis approved by:

Group Head:  <small>DocuSigned by:          karen Sinclair          BB3EBC3BDA2B47D...</small>	Date: 24 October 2022   12:40 PM BST
--	--------------------------------------

**Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team and ensure the document is uploaded to the EA Register which will be available to the public:**

**This Equality Analysis Template is the intellectual property of The National Equality Analysis Support Service Ltd (NEASS) and must not be distributed to or used by any other private or public body, any commercial organisation or any third party without the express permission of NEASS who can be contacted on:**

**The National Equality Analysis Support Service Ltd, 71 – 75 Shelton Street, Covent Garden, London, WC2H 9JQ**

**Office: 0203 500 0700    Email: [info@equalityanalysis.org.uk](mailto:info@equalityanalysis.org.uk)    Web: [www.equalityanalysis.org.uk](http://www.equalityanalysis.org.uk)**



## **Background**

Section 166a of the Housing Act 1996 requires local housing authorities to have a policy in place for determining priorities and procedures to be followed in allocating housing. The Allocation Policy must set out the Council's policies relating to the allocation of social housing and the procedures and processes used by officers to implement those policies. Priority for accommodation must be given to the groups who fall within the statutory reasonable preference categories, namely:

- People who are homeless (within the meaning of Part 7 of the Housing Act 1996);
- People who are owed a duty by a local housing authority;
- People occupying insanitary or overcrowded housing, or otherwise living in unsatisfactory housing conditions;
- People who need to move on medical or welfare grounds;
- People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others).

The latest Housing Allocation Policy was last published in Spring 2018 and is due to be updated to reflect wider policy and law changes. In response to increasing demand for social housing and the existing levels of homelessness, amendments to the allocations policy are needed to ensure that it reflects current priorities, and to ensure that applicants with most acute need are prioritised. There are currently over 3,000 households on the housing register with less than 200 lets being made per annum. It is therefore likely that many of those on Spelthorne Borough Council's housing register will never move into social housing.

In light of the above, a number of changes to the existing Housing Allocations Policy have been proposed to ensure the Housing Allocation Scheme more accurately reflects the rehousing priorities for the borough. The priorities for the Allocations Policy are:

- Reducing the number of homeless households who are living in unsuitable and costly emergency accommodation;
- Reducing under occupation and severe overcrowding;
- Supporting those who are fleeing domestic abuse;
- Delivering on our corporate responsibilities, including our role to support members of the armed forces who are in housing need;

Spelthorne Borough Council are now inviting the public to respond to the consultation and an outline of the main changes to the policy are summarised below.

## The Proposed Changes to the Housing Allocations Policy

### Changes to the banding structure (Section 2.9 and Appendix 1)

- Reducing the existing number of 7 bandings to 5. The new bandings will be:

Band A	Emergency/Priority
Band B	Urgent need to move
Band C1	Identified need to move – all applications including transfer cases
Band C2	Cases with a reasonable preference need but no local connection
Band D	Low housing need and no 'deemed' housing need

- Applicants assessed for overcrowding by the Council's Environmental Health team will now be placed in the associated banding depending on the assessment outcome and varying level of need. Those assessed as Statutorily Overcrowded (within the meaning of Part 10 of the Housing Act 1985) where the applicant has not worsened their housing situation without good reason will be placed into a band A. If the applicant is assessed under the Housing Health & Safety Rating System as a Category 1 Hazard, they will be placed in Band B or if assessed as a Category 2 Hazard, they will be placed in Band C.
- As in line with the Armed Forces statutory guidance introduced in June 2020 by Department for Levelling Up, Communities and Housing (DLUCH), banding priority will now also be awarded to divorced or separated spouses (or civil partners) of service personnel who need to move out of accommodation provided by the Ministry of Defence.

### Changes to the qualification criteria (Section 2.3 and 2.4)

- Where family connection is used as an applicant's only local connection to the borough of Spelthorne, the applicant must be able to demonstrate (through evidence) that the family member or the applicant has a current and ongoing unique welfare and / or health need and the applicant's reason for living in the Borough is to support the family member or to receive support from a family member, which must be evidenced by professionals supporting the household.
- Where employment is used as an applicant's local connection, the applicant must be able to demonstrate a certain number of hours worked based on household make-up. For a single person, this is 16hrs per week and for a couple, 24hrs per week. These hours are replicated from DWP's calculation of tax credits. Furthermore, this local connection has been amended to detail the considerations for zero-hour contracts, self-employed applicants who have a business registered in the borough of Spelthorne and Key Workers as detailed in a separate Key Worker policy.
- As in line with the Armed Forces statutory guidance introduced in June 2020 by DLUCH, any lump sum received by a member of the Armed Forces as compensation for an injury or disability sustained on active service will be disregarded from the savings threshold. All other applicants must not have a total household savings greater than £30,000.

- The maximum income threshold to qualify for the housing register has been updated and differentiated for single and joint applicants. To qualify, single person household applicants must not have an income higher than £30,000 net and applicants joint household income must not be greater than £60,000 a year net.
- Social housing tenants on a probationary tenancy without an identified housing need will not qualify for the housing register unless in exceptional circumstances per Spelthorne Borough Council's discretion.
- Applicants have the responsibility to satisfy the Council with appropriate information and evidence to demonstrate that they meet the qualification and eligibility criteria throughout the lifetime of the application. Such examples include, providing payslips to demonstrate continuous employment in Spelthorne for local connection or bank statements to demonstrate an applicant remains under the threshold for income and savings. All information may be subject to enhanced verification checks.
- People in prison who apply to join the register will now be unable to join, as they will be classified as not having a housing need whilst in prison. However, 56 days before release they can make a homeless application to the Council if they are threatened with homelessness. If they are assessed by the Council as being owed a homelessness prevention duty, they will be able to make a housing register application prior to release. Furthermore, applicants who are on the Register and subsequently serve a prison sentence, will have their application suspended during their prison stay. Any length of time that is accrued during the suspension of the application will not qualify towards the applicant's priority date and thus the priority date will be re-set upon any subsequent reactivation of the application.
- The disqualification criteria outlines a specific section for those who are deemed to have 'deliberately worsened' their circumstances and will therefore be disqualified from the housing register for a minimum of 5 years. Such examples include:
  - Applicants who give up a home they that owned, rented, shared, or had rights to but chose to leave or dispose of within the last 5 years of an application being made. This includes 'gifting' a home to friends and/or relatives, both within and outside the UK, where they could have reasonable been expected to reside, or to sell, using the proceeds to resolve housing difficulties
  - Applicants who have given up a social housing tenancy within the past five years, not due to violence / threats of violence / harassment / anti-social behaviour / domestic abuse / hate crime, or any other similar danger to life and welfare.
  - Applicants who deliberately overcrowd their home, either with or without the objective of obtaining priority for social housing (section 2.14 outlines assessment of overcrowding and bedroom shortages).

- Applicants who deliberately move to a home which was clearly unaffordable, either with or without the objective of obtaining priority for social housing.

### Other Changes

- Joint applications may now be made by friends in specific circumstances at the discretion of the Council
- Introduced auto bidding for all accepted homeless applicants. This maximises the number of properties available to let and where a bid results in an offer of accommodation, and this property is deemed to be suitable, this will normally be deemed to be a final offer of accommodation which will end the homelessness duty under Part 7 of the Housing Act 1996 and Homelessness Reduction Act 2017. This is subject to right of review.
- Moving from the 'SEARCH Moves' domain to 'Homes4Spelthorne' due to the partnership split between the Council's of Runnymede and Spelthorne. Homes4Spelthorne will be exclusive to applicants on Spelthorne Borough Council's housing register.
- Preferential advertising to working households has been updated to reflect the value placed in community contribution. The existing policy sets aside approximately 10% of all properties advertised to working households which are then further prioritised by band. This is to give special recognition to the importance of incentivising work. This section of the policy has now been expanded to give preferential advertising to applicants who are volunteers and who have volunteered for a minimum of 16 hours a week, for at least 6 months out of the last 12 months, for a registered charity which provides a service to the Spelthorne community.
- The overall policy has been updated to reflect wider policy and legislation changes since its last inception. For example, Homelessness Reduction Act 2017, Data Protection Act 2018, Improving Access to Social Housing for Members of the Armed Forces Statutory Guidance 2020, Domestic Abuse Act 2021, Homelessness Code of Guidance 2018 (updated 2021), and Allocation of Accommodation: Guidance for Local Housing Authorities in England 2012 (updated 2021).

## Appendix C

### 1.1 Calculated Bedroom Need

For the purposes of assessing applicants' bedroom need a separate bedroom is allocated to each of the following:

- The main applicant and spouse / partner
- Two children of either sex where they are both under 10 years of age
- Two children of same sex where there is an age gap of less than 10 years
- Two children of same sex where there is more than a 10-year age gap but where both are under 16
- An overnight carer

### 1.2 It should be noted that:

- A child will be considered to have a 'need' from birth
- A single adult within the household (who is not the applicant) would only be entitled to a separate room if there is no other person they can share with within the above list. However, an adult would not be expected to share a room with their own child.

### 1.3 In exceptional circumstances, such as a medical need, additional bedroom requirements may be considered. Children who are away from home, for example at university, will still be treated as part of the household provided that there is a clear intention to return.

A more detailed explanation is set out under the Housing Register section of the Housing Allocations Policy. [Housing Allocations Policy - Spelthorne Borough Council](#)

This page is intentionally left blank