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

Date 21 June 2022

Dear Jane

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

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

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

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

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

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

If you have any question, please contact me.

Yours sincerely

Judith Montford
Planning Specialist

Direct dial 0208 026 3064
E-mail Planning_THM@environment-agency.gov.uk

Cont/d..

LEVEL 1 SFRA

Appendix 1

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

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

Living Document

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

3.2 Flooding from Rivers

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

Flood Zone 3b Functional Floodplain

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

Climate Change

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

Flood Risk Management Strategies

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

Section 3.3 Flooding from Surface Water

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

Section 3.7 Assessing the cumulative impact of development.

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

4.2 Applying the Sequential Test for the Local Plan

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

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

4.3 Applying the sequential test for planning applications.

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

5.3 Safeguard land for flood risk management

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

5.4 Sustainable drainage systems

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

5.9 Finished Floor Levels

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

6.2 Access and Escape

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

7.0 Preparing Site Specific FRAs

- Email address has been corrected in section 7.3.5. **No further comments.**
- Section 7.3.6 has been updated to now state "*Where a proposed development site is in close proximity to a watercourse (Main River or Ordinary Watercourse) and either no modelling exists, or the available modelling is considered to provide very conservative estimates of flood extents (due to the use of national generalised JFLOW modelling), applicants may need to prepare a simple hydraulic model to enable more accurate assessment of the probability of flooding associated with the watercourse and to inform the site-specific FRA*". **Please beware of future updates and refer to [Updates to national flood and coastal erosion risk information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/updates-to-national-flood-and-coastal-erosion-risk-information-2016.pdf) for more information.**

Appendix

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

Level 2 SFRA

Section 1.3 Level 2 SFRA

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

Exception Test

- **No further comment** to Table 1.1

Section 1.6 Future Updates to the SFRA

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

Section 2.0 Datasets

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

Section 2.4 Groundwater Flooding

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

Section 2.7 RTS

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

Section 2.8 Cumulative impact of development

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

Section 3.2 Site Assessments

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

Site Allocations:

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

Access and Egress relating to the listed site allocations

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

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

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

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

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

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

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

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

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

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

5. Thameside House (ST1/037) – Small section of site (nearest river) includes Danger for Most and Access includes Danger for Most
6. Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street (ST4/002)- Danger for Most
7. 96-104, Church Street (ST4/004)- Hazard varies but includes Danger for Most
8. The Elmsleigh Centre and adjoining land, South Street (ST4/009) – Danger for most
9. Riverside Surface, Carpark, Thames Street (ST4/010) - Danger for Most
10. Debenhams site, 35-45, High Street (ST4/019)– Access Danger for Most
11. T wo Rivers Retail Park Terrace, Mustard Mill Road (ST4/023) – Access Danger for Most
12. Frankie & Benny’s/Travelodge, Two Rivers (ST4/024) – Access Danger for Most
13. Land at Coppermill Road, Coppermill Road (ST4/025)
14. Communications House (ST4/026) – Access Danger for Most
15. William Hill / Vodafone, Monsoon (ST4/028) – Access Danger for Most

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

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

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

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

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

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

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

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

Sites to be removed from the local plan

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

1) Site ST4/002 Bridge Street Car Park

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

2) Site ST4/010 Riverside Car Park

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

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

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

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

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

Appendix B

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

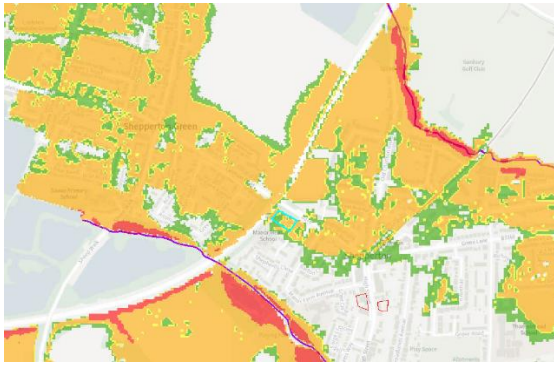
For some sites (where relevant), AECOM has added a sentence in summary section of site assessments to highlight about CC allowances and neighbouring catchments. **No comments**

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

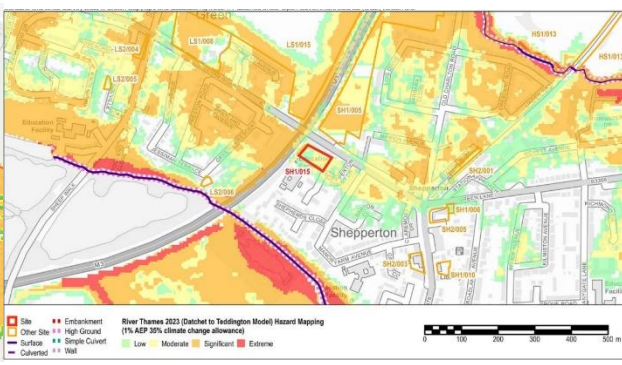
Site assessments now refer to which catchment should be used when assessing climate change (where relevant). **No comments**

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

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



Screenshot 1



Screenshot 2

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

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

Development footprint

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

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

River Thames Scheme (RTS)

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

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

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

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

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

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

Flood Risk within the Leeds District

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

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

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

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

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

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

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

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

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

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

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