

creating a better place



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

Date 1 July 2024

Dear Jane

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

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

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

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

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

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

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

Cont/d..

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

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

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

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

If you have any question, please contact me.

Yours sincerely

Judith Montford
Planning Specialist

Direct dial 0208 026 3064

E-mail Planning_THM@environment-agency.gov.uk

Appendix 1

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

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

Hi Judith,

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

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

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

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

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

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

Please can you amend this and reissue your letter ASAP?

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

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

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

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

Monday 8 July – any time to 4pm

Many thanks,
Jane