Elmbridge Local Plan
Draft Flood Risk Supplementary Planning Document

Consultation Statement
(Regulation 12)

Website:  www.elmbridge.gov.uk
Email:      planningpolicy@elmbridge.gov.uk
Contact details

Email: planningpolicy@elmbridge.gov.uk

Telephone: 01372 474747

Address: Planning Policy Team
Planning Services
Elmbridge Borough Council
Civic Centre
High Street
Esher, Surrey
KT10 9SD

Website: www.elmbridge.gov.uk/planning
Contents

1. Introduction 1

The purpose of the Consultation Statement 1
Background to the Flood Risk Supplementary Planning Document (SPD) 1

2. Initial Consultation on the Draft SPD 2

Who was consulted and how? 2
Key issues raised and how they were addressed in the Draft Flood Risk SPD 2

3. Strategic Environmental Assessment and Habitats Regulation Assessment 3

4. Formal consultation on the Draft Flood Risk SPD 4

Who was consulted and how? 4
Key issues raised during the consultation and how they were addressed in the final SPD 5

Appendices

Appendix 1: List of people and organisations invited and consulted on the Draft SPD 9
Appendix 2: Consultation E-mail Invite
Appendix 3: Formal Consultation Letter
Appendix 4: Representations Form (Questionnaire)
Appendix 5: Consultation Homepage
Appendix 6: Elmbridge Homepage and Planning Policy Update
Appendix 7: Advert in Surrey Advertiser
Appendix 8: Noticeboard Posters
Appendix 9: Tweets
Appendix 10: Statement of Representations Procedure
Appendix 11: Schedule of Responses
1. Introduction

The purpose of this consultation statement

1.1 This statement has been prepared by Elmbridge Borough Council in accordance with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 Regulation 12(a) states that prior to a local authority adopting a Supplementary Planning Document (SPD) they must prepare a statement setting out:

i. The persons the local planning authority consulted when preparing the supplementary planning document;

ii. A summary of the main issues raised by those persons; and

iii. How those issues have been addressed in the supplementary planning document

1.3 This statement is therefore a record of the consultation undertaken during the preparation stages of the SPD and the formal public consultation stage. It also explains how comments have been taken into account in preparing the Final SPD.

Background to the Draft Flood Risk Supplementary Planning Document

1.4 The purpose of the Flood Risk Supplementary Planning Document (SPD) is to assist applicants and the public in understanding how the Council will implement planning policies and consider flood risk as part of the planning application process. It brings together the Council’s approach to flood risk set out within the Core Strategy Policy CS26: Flooding, Policies DM6: Landscape and Trees and DM13: Riverside Development Uses of the Development Management Plan, the Design and Character SPD and the Strategic Flood Risk Assessment (SFRA) (June 2015).

1.5 Specifically, the guidance will help applicants to:

- Determine if a Flood Risk Assessment (FRA) is required;
- Consider whether the proposed development is likely to be appropriate;
- Understand how flood risk is dealt with as part of the planning process;
- Submit a valid planning application;
- Determine if any other consents are required;
- Access the various pre-application services available;
- Outline which organisations the Council will consult with;
- Complete the FRA proforma and prepare a FRA that is: suitable to the scale, nature and type of development proposed as well as the type and degree of flood risk; and contains sufficient information to support decision making
2. **Initial Consultation on the Draft Flood Risk SPD**

**Who was consulted and how**

2.1 Extensive engagement has taken place with various Council departments throughout the preparation of the Draft SPD including with the Council’s Countryside, Development Management, Landscape, Trees and Heritage, Emergency Planning and Environmental Services Teams. The Draft SPD has also been considered by Members of the Local Plan Working Group and Cabinet.

2.2 Informal discussions on the content and scope of the Draft SPD have also taken place with the Environment Agency and Surrey County Council (as the Lead Local Flood Authority).

2.3 In addition, the Draft SPD is based on information contained within the SFRA. Significant engagement was undertaken with key stakeholders throughout the preparation of the SFRA. This was to fulfil the requirements of the Duty to Cooperate which places a legal duty on local authorities to cooperate within one another, County Councils and other Prescribed Bodies on issues which may have cross boundary implications. The Council prepared and consulted on a Duty to Cooperate Scoping Statement as part of the background work to prepare the Elmbridge Local Plan. Flood Risk is identified as an issue which may have cross boundary implications and specific engagement activities were proposed and undertaken throughout the preparation of the SFRA. Details of engagement activities can be found within the [Duty to Cooperate Scoping Statement](#).

**Key issues raised and how they were addressed in the Draft SPD**

2.4 Discussions with the Environment Agency and Surrey County Council helped to provide a general steer on the scope and content of the SPD as well as address some specific issues. Specific issues that were addressed at this stage include:

- Ensuring that the approach to mitigation measures is appropriate for minor development within high risk areas e.g. developed areas within Flood Zone 3b;
- Including details of the Environment Agency’s and Surrey County Council’s pre-application services and how to access them;
- Reference to the circumstances that would trigger a requirement for an FRA in relation to surface water and groundwater flooding;
- Clarifying the mitigation measures to be considered in relation to groundwater flooding;
- Providing details of how applicants can access more detailed information on the scale and nature of flood risk relating to a site.

2.5 Key changes that were made as a result of engagement with other Council Teams and Members include:

- Inclusion of landscape and trees as a consideration within Section 2.3 ‘Part 3 of FRA - Assessing Flood Risk’;
• Clarifying the types of applications that may require a FRA;
• Ensuring that the Draft SPD could be used by applicants as a practical tool to prepare FRAs and ensure the appropriate information is submitted alongside planning applications
• Inclusion of a ‘How to Use this SPD’ section with summary information to assist applicants in determining if a site is affected by flooding and where information is provided free of charge;

3. Strategic Environmental Assessment and Habitats Regulations Assessment

3.1 The Draft Flood Risk SPD has been subject to a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment screening process¹. The Council consulted the relevant statutory environmental bodies on a draft screening report between 20 August and 18 September 2015, with an agreed extension for Natural England until the 25 September 2015:

- Environment Agency
- Natural England
- Historic England

3.2 Responses were received from The Environment Agency (EA) and Natural England (NE), with no response from Historic England. The EA commented that as the Council has a Sustainability Appraisal for its adopted Local Plan, an SEA would not be expected to be undertaken for the Flood Risk SPD. The EA also had no comments to make on the HRA. The response from NE advised that the body was satisfied as regards the content and confirmed that no SEA / HRA assessment is required.

3.3 The Council, having taken account of the above consultation responses, has therefore determined that there is no need to undertake an SA/SEA or HRA for the Flood Risk SPD².

---

¹ In accordance with Regulation 9(1) of the Environmental Assessment Regulations 2004 and the Conservation of Habitats and Species Regulations 2010
² Determination Statement under Article 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 in response to the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report for the Flood Risk SPD – consult.elmbridge.gov.uk
4. **Formal consultation on the Draft Flood Risk SPD**

4.1 Formal public consultation on the Draft Flood Risk SPD was undertaken for a period of four weeks from Monday 12 October 2015 to Monday 9 November 2015.

**Who was consulted and how?**

4.2 The Council consulted everyone registered on the Planning Service database who has requested to be notified of future planning policy consultations. This also included all specific and general consultation bodies.

4.3 In total, 1734 people were invited to participate in the consultation. A list of the individuals and organisations invited to make representations are set out at Appendix 1.

4.4 In accordance with the Council’s Duty to Cooperate Scoping Statement April 2014, the following adjoining local authorities and prescribed bodies have also been notified of the consultation.

- Environment Agency (EA)
- Guildford Borough Council
- Highways Authority – Surrey County Council
- Lead Local Flood Authority – Surrey County Council (LLFA)
- Local Nature Partnership – London
- Local Nature Partnership – Surrey (c/o Surrey Wildlife Trust)
- London Borough of Richmond upon Thames
- Mayor of London / Greater London Authority
- Mole Valley District Council
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Woking Borough Council

4.5 In addition, the Council have also proposed to consult with the following organisations who are not a ‘prescribed bodies’ for the purposes of the Duty to Cooperate, but who have responsibilities in terms of managing flood risk / the impact of flooding e.g. water companies, sewerage and reservoir undertakers.

- River Mole Catchment Partnership
- River Thames Alliance
- Royal Society for the Protection of Birds (RSPB)
- Thames Water
- Wey Landscape Partnership

4.6 An internal e-mail was also sent to all officers working in Planning Services and all ward Councillors informing them of the Draft Flood Risk SPD consultation.
4.7 Consultees were informed of the Draft SPD via an email invite to the consultation or letter (Appendix 2 and 3). Included with the letter and sign posted in the email was key information including how to view the document and make comments.

4.8 A questionnaire was produced for the consultation document which asked for specific responses to certain chapters of the document. This document was also available for printing or hard copy (see Appendix 4).

4.9 A specific consultation webpage for the Draft Flood Risk SPD was published (see Appendix 5). As well as explaining the purpose of the document, the webpage also provided key information regarding the consultation and next steps. The SFRA, Statement of Representations Procedure and SEA/HRA Determination Statements were also featured. Elmbridge Borough Council’s main homepage provided a link to the consultation as well as the planning news webpage in the planning services section of the website (Appendix 6).

4.10 The Council also gave notice by public advert which was featured in the Surrey Advertiser on the Friday 9 October 2015 (Appendix 7). A poster was also placed on each of the borough noticeboards (Appendix 8). Tweets were released throughout the four weeks of consultation to ensure people were aware of the consultation (Appendix 9).

4.11 Copies of the Draft SPD and Statement of Representations Procedure (Appendix 9) were also made available in all local libraries across the Borough.

Key issues raised during the consultation

4.12 In total, 1734 people were invited to participate in the consultation. The responses came from:
- 2 Individual residents
- 4 Residents groups
- 3 Organisations
- 13 Consultation bodies

4.13 Appendix 11 sets out comments received in full along with the Council’s response. The majority of the representations received did not lead to any changes being proposed to the SPD. In general the SPD was welcomed, the main issues raised by representations that were duly made included:

- Definition of development types, in particular what constitutes ‘minor’ development.
- Amplification of the types of development that would be considered appropriate and inappropriate in each of the Flood Zones.
- Consideration of climate change modelling, assumptions and approach.
- Parameters of the Sequential and Exceptions Tests.
- Threshold for development required to provide flood compensation storage within Flood Zone 3b (1 in 20 year flood outline) in the ‘Developed Area’.
- Officer knowledge and access to specialist advice when assessing applications.
How the key issues have been addressed in the final SPD?

Definition of development types, in particular what constitutes minor development

4.14 The requirements within the SPD vary depending on the type of development proposed and throughout the document distinctions are made between ‘all development’, ‘major development’, ‘minor development’, ‘other development’ and ‘small scale development’. These definitions are set within legislation, national policy and guidance. To assist applicants, Officers have included definitions of the types of development within the SPD (see Section 2.1.5).

Amplification of the types of development that would be considered appropriate and inappropriate in each of the Flood Zones

4.15 The content of table; ‘Development type and appropriate uses’ (now Table 8 in the amended SPD) is based on the national guidance. Officers have reviewed the contents of the draft table and provided further clarification where possible.

Consideration of climate change modelling, assumptions and approach

4.16 As part of the modelling studies for rivers in Elmbridge simulations have been run for the 1% annual probability (1 in 100 year/Flood Zone 3) including the implications of climate change. This does take account of the presence of defences. This means for example, sites indicated to be in lower risk areas (Flood Zone 2) could in future be in a higher risk zone (Flood Zone 3a). For clarity, it is recommend that the approach of the SPD is revised to require that any predicted greater risk is addressed within a Flood Risk Assessment. This will need to demonstrate that the proposal is safe, does not increase the risk of flooding or impeded flows over the lifetime of the development. The FRA must be accordance with the latest Environment Agency guidance on taking account of Climate Change. The latest update from the EA in relation to land use planning is expected by the middle of 2016.

Parameters of the Sequential and Exceptions Tests

4.17 Core Policy CS26 firstly seeks to direct new development to the lowest possible flood zone and it is considered that this needs greater emphasise within the SPD. Officers have included further explanation of the Sequential and Exception Tests. In relation to assessing Part 1 of the Exceptions Test, it is not possible to confirm within the SPD the benefits which will always outweigh the flood risk. This will be considered on an individual basis taking into account the proposed use/s and the demonstrated need. This will be considered against the Sustainability Appraisal Objectives and the most up to date relevant evidence bases. The Council will seek the advice of statutory stakeholders as required. Whilst Part 1 of the Exceptions Test provides an opportunity to demonstrate the wider sustainability benefits of the development that outweigh its location within an area at risk, Part 2 of the test must demonstrate that the development complies with the remaining criteria of the policy CS26.
Threshold for development requiring to provide flood compensation storage within Flood Zone 2b (1 in 20 year flood outline), Developed Area

4.18 Appendix 2 states that small scale development within Flood Zone 3b (1 in 20 year flood outline) requires that a FRA considers in detail, the flood risk implications of the development. Proposals should not increase flood risk elsewhere by impeding flow or reducing storage capacity. Whilst flood compensation storage may not be achievable on all sites, it needs to be demonstrated that every effort has been made. With larger extensions to homes and commercial buildings it is unlikely that a proficient FRA will be able to demonstrate that there is no opportunity for flood compensatory storage.

Officer knowledge and access to specialist advice when assessing applications

4.19 A FRA should be undertaken by a suitably qualified person. This is particularly important in cases where the risk of flooding is high. Internal knowledge of flooding and flood risk is increasing to deal with the majority of schemes. Specific training opportunities are being considered and Officers have been in discussions with other local authorities to see whether resources from drainage engineers could be sought on more detailed schemes.

Other amendments made Post-Consultation

4.20 It is acknowledged that the SPD contains a lot of technical information which could be overwhelming to potential users. To assist applicants and Officers and to improve the usability of the SPD changes have been made to its structure. As well as a more detailed introduction, the SPD has been divided into three parts rather than two. Part 1 of the document sets out the context and flood risk policies that guide development in Elmbridge. Part 2 provides guidance on identifying flood risk and the planning process with Part 3 of the document designed to assist applicants in the preparation of a FRA.

4.21 Officers have re-ordered Part 2.1 ‘Development and Flood Risk’ to reflect the stages that applicant’s should take when considering flood risk and the Development Management process as a whole.

4.22 Officers have undertaken internal discussions with the planning Appeals and Registration Team to discuss the validation requirements proposed within the Draft SPD. Having consideration for the statutory tests (section 62 (4A) of the Town and Country Planning Act 1990 (as amended) for imposing validation requirements. Concerns were raised as to whether it would be reasonable and proportionate to require applicants to provide a FRA and a completed FRA Proforma for all applications.

4.23 In the case of minor and other planning applications, a completion Proforma would effectively repeat the findings of the accompanying FRA. Officers are of the view that this could be considered as an unnecessary duplication of work and unduly onerous on applicants. As such, could be open to challenge at appeal for non-determination.
4.24 Therefore, a completed FRA Proforma will not be a local planning validation requirement for minor and other (i.e. householder) planning applications, but a tool for applicants to use if they so choose, to help them comply with the requirement to provide a FRA. For small scale development a FRA template (refer to Appendix 4 of the SPD) has been produced to assist applicants.
Appendix 1: People and organisations invited and consulted on the Draft Flood Risk SPD.

Specific Consultee Bodies:
- Chichester District Council
- Civil Aviation Authority
- Claygate Parish Council
- Crawley Borough Council
- Department of Transport
- East Horsley Parish Council
- Effingham Parish Council
- Enterprise M3
- Environment Agency
- GLA Greater London Authority
- Guildford Borough Council
- Highways England
- Historic England (South East Region)
- Homes and Communities Agency
- Horsham District Council
- Lambeth Council
- London Borough of Bromley
- London Borough of Hammersmith & Fulham
- London Borough of Richmond upon Thames
- Marine Management Organisation
- Mid Sussex District Council
- Mole Valley District Council
- Natural England
- Network Rail
- NW Surrey Clinical Commissioning Group
- Office of Rail Regulation
- Office of the Police and Crime Commissioner for Surrey
- Royal Borough of Kensington & Chelsea
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Sevenoaks District Council
- South Downs National Park Authority
- Spelthorne Borough Council
- Surrey and Sussex NHS Healthcare
- Surrey County Council - Strategy, Transport and Planning
- Surrey Downs Clinical Commissioning Group
- Thames Water Property Services Ltd
- Three Rivers District Council
- Transport for London
- Veolia Water Central
- Waldon Telecom Ltd
- Wealden District Council
- Westminster City Council
- Woking Borough Council

General Consultee Bodies:
- Claygate Chamber of Commerce (and Catling & Co)
- Cobham Chamber of Commerce and Savills
- Elmbridge Business Network
- Elmbridge Chamber of Commerce
- Elmbridge Community Safety Partnership
- Elmbridge Multi-Faith Forum
- Friends, Families and Travellers
- Showmen's Guild of Great Britain
- Surrey Chamber of Commerce
- The National Federation of Gypsy Liaison Groups
- Traveller Law Reform Project
- Voluntary Action Elmbridge
- Walton Charity
- Walton, Weybridge, Hersham Citizens Advice Bureau

Other Consultees:
- Built Environment/Planning/Property & Developers
  - Alliance Planning Ltd
  - Antler Homes Southern plc
  - Anyards Designers & Surveyors Ltd
  - Ashill Developments
  - Aston Mead
  - Banner Homes
  - Barons Estate Agents
  - Barton Willmore
  - Bellway Homes (South East)
  - Berkeley Group
  - Bewley Homes Plc
  - Birds Hill Oxshott Estate Co. Ltd
  - Bloor Homes
Blue Sky Planning
BNP Paribas
Boyce Thornton
Boyer Planning
Brian Prideaux Chartered Architects
Building Plans
Burhill HomesBy Design Architects
Cala Homes South Ltd
Carter Jonas
Carter Planning Limited
Castle Wildish
Catling & Co
Catriona Riddell Associates
CgMs Consulting
CgMS Consulting (Metropolitan Police Authority)
Christian Leigh
Clive Tatlock Associates
Cluttons LLP
Colliers CRE
Consilium Developments
Construction Computing Services
Coventry Design
Crane & Associates Ltd
Curched & Co
Dalton Warner Davis
Davis Planning
Dean Design Architectural Services
Deloitte Real Estate
Denton Homes Ltd
Derek G Marlow - Chartered Surveyor
Derek Horne & Associates
DHA Planning & Development
DPDS Consulting Group
Drivers Jonas
DTZ
DW & Co Property Brokers
Entec UK Ltd
Fairview New Homes Ltd
Firstplan
FTB
Future Create
G L Hearn
Garland Group Ltd
Gascoigne Billinghurst
Gascoigne Pees Lettings and Countrywide Lettings
Gascoigne-Pees
Genesis TP
Gerald Eve Surveyors
Glenavon House
GMS Estates Limited
Gregory Gray Associates
Harper Planning Consultants
Hawes & Co
Helas Wolf
Henry Adams Planning Ltd
Heritage Period Properties
Home Builders Federation
Home Design Services
Howard Hutton & Associates
Huggins Edwards & Sharp
Hughes Associates
Hurst Warne & Partners LLP
Ian Allan Group Ltd
Iceni Projects
Indigo Planning Limited
Jackson-Stops & Staff
Jones Granville
Jones Lang Lasalle
JTS Partnership
Kingston Homes Ltd
Kirkwells Town Planning Consultants
Knight Norman Partnership
Lambert Smith Hampton
Latchmere Properties Ltd
Lewandowski Willcox
Lightwood Property
Linden Homes South East
MAA Architects
Malcolm Jenkins Associates
Martin Flashman & Co
Mary Hackett & Associates
Maven Plan Ltd
MBP Architects
Mitchell Evans Partnership
Molesey Industrial Estate: OYO
Murdoch Planning
Nathaniel Lichfield and Partners
Next Generation Homes
Octagon Developments Limited
Omega Partnership Ltd
OSP Architecture
Paragon Europe
Paul Dickenson & Associates
Peacock & Smith
Peer Group PLC
Pereira-Walshe Partnership
Peter Collins Associates
Peter Whicheloe Architecture Ltd
Phillips Planning Services Ltd
Planning Potential Ltd
Planning Works Ltd
Portaplanning
Preston Bennett Planning
Pro Vision Planning & Design
PRP Architects / Planning
Rapleys LLP
RB Designs Ltd
Reside Developments
Richard Flowitt Partnership
Richard Gardiner Architects
Sassi Chamberlain Architects
Savills
Setplan Ltd
Shanly Homes Ltd
Simon T.F. Craig RIBA
Smiths Gore (Crown Estate Managing Agents)
Souhile Faris
South London Partnership
Springwheel Associates
SSA Planning
Star Planning
Strutt & Parker
Taylor Associates
Taylor Wimpey Homes
Telereal Trillium
Terence O'Rourke
Tetlow King Planning Ltd
The JTS Partnership
The Planning Bureau Ltd
The Planning Inspectorate
Trenchard Arlidge
Try Homes
Turner Associates
Urban DNA
Urbanicity
Vail Williams LLP
VLH Associates
Wakelin Associates Architects
West London Alliance
West Waddy ADP
White Young Green Planning
Woolf Bond Planning

Business
A W Law and Esher Business Guild
Angela Williams & Associates Ltd
Barwell Court Estate
Buds & Blooms
Burhill Kennels Consortium
Domino 4 Ltd
DTZ
Eurotech Computer Services Ltd
FSB
Galleria
Garsons
Guy Salmon Jaguar Ltd
Jedco Product Designers Ltd
Lidl UK GmbH
Mattias Billing Dental Office
Mott Macdonald
Nicholas Drury
Origin Brand Consultants
Osborne and Collins Ltd
Queens Road Business Guild
Rhodes Foods Limited
Safino Limited
Stewart Ross Associates
The Weybridge Office
Thro' the Looking Glass/Bluebell Lingerie/D & D Photography
Top Flight Loft Conversions Ltd
Tops Pizza & Chella Cafe
TW Management Services
Village Mowers Ltd
Waitrose
Walton Plating Ltd
Williamson Partnership

Community
Black Hills Residents Association
Clare Hill (Esher) Association
Claremont Park Residents Association
Claygate Parish Council
Claygate Village Association
Cobham & Downside Residents' Assn
Danes Court Estate (Oxshott) Residents Association
Envisage
Esher Residents Association
Fairmile Park Road Residents
FEDORA
Field Place Weybridge Residents
Association Ltd  
Hersham Residents Association  
Hersham Village Society  
High Pine Close Residents Association  
Hinchley Wood Residents Association  
Knott Park Residents Association Ltd  
Leigh Place Cobham Residents Association  
Long Ditton Residents Association  
Molesey Residents Association  
Milbourne Local Group  
Oakdene Residents Association  
Ockham & Hatchford Residents' Association  
Oxshott Way Residents Association  
Portmore Quays Residents Ltd  
Sandy Holt Residents Management Co Ltd  
Sandy Way Residents Association  
Southborough Residents Association  
St Georges Residents Association  
Stoke D'Abernon & District Residents Association  
Templemere  
Thames Ditton and Weston Green Residents Association  
Torrington Close Association  
Walton Lane & Thames Street Residents Association  
West End Residents Association  
Wey Road & Round Oak Road Residents' Association  
Weybridge Society  
Wrens Hill Residents Association  

Local Residents - 521  

Education  
Bell Farm Junior School  
Bloo House  
Burhill Community Infants School  
Cardinal Newman RC Primary School  
Chandlers Field School  
Claremont Fan Court School (Senior)  
Claygate Primary School  
Cranmere Primary School  
Danes Hill Pre-Pre School  
Danes Hill School  
Danesfield Manor School  

Emberhurst School  
Esher Church of England High School  
Esher Church School  
Esher College  
Feltonfleet School  
Grovelands School  
Heathside School  
Hinchley Wood Primary School  
Hinchley Wood Secondary School  
Long Ditton Infant & Nursery School  
Long Ditton St Mary's C of E (Aided) Junior School  
Manby Lodge Infants  
Milbourne Lodge School  
Notre Dame Senior School  
Oatlands School  
Parkside School  
Reed's School  
Rowan Brae  
Rowan Preparatory School  
Royal Kent Primary School  
Shrewsbury Lodge  
St Alban's Catholic Primary School  
St Andrews C of E Primary School  
St Borromeo Catholic School  
St George's College Junior School and College  
St James CE Primary School  
St Lawrence CE (Aided) Junior School  
St Matthew's Church of England Infant School  
St Pauls Catholic Primary School  
St. Lawrence CofE Aided Junior School, East Molesey  
Thames Ditton Infant School  
Thames Ditton Junior School  
The Orchard School  
The Royal Kent C/E Primary School  
Walton Leigh School  
Walton Oak School  
Weston Green School  
Westward Preparatory School  

Environment  
Forestry Commission  
CPRE  
CPRE (Surrey Office)  
Danes Hill School  
Elmbridge Environmental Forum
Environmental Transport Association
Fields in Trust
Friends of the Earth
Hampshire and Isle of Wight Local Nature Partnership
London Local Nature Partnership
National Farmers' Union
Open Spaces Society
Painshill Park Trust
River Mole Catchment Partnership
River Thames Society
River Thames Alliance
Road Representative, Thames Ditton
Royal Society for Protection of Birds
Surrey Countryside Access Forum
Surrey Nature Partnership
Surrey Wildlife Trust
Thames Renewables
Wey Landscape Partnership

Faith
All Saints Weston
Church of the Holy Name, Esher
Hersham Baptist Church
Molesey Community Church Trust
Richmond Upon Thames Churches
St James' Parish Church
St Mary's Parish Church
Walton Baptist Church

Health
Capelfield Surgery, Claygate
Health & Safety Executive
New Approaches to Cancer
NHS South East Coast
Surrey Care Trust
The Princess Alice Hospice

Heritage/Historic
Ancient Monuments Society
Brooklands Museum
Claygate CAAC
Cobham CAAC
Cobham Conservation & Heritage Trust
Downside CAAC
East Molesey CAAC
Esher & District Local History Group

History Society
Society for the Protection of Ancient Buildings
Surrey County Council (Heritage)
Thames Ditton CAAC
The Gardens Trust
Walton CAAC
Weston Green CAAC
Weybridge CAAC

Housing Trusts/Associations
Rentstart
A2 Housing Group
National Housing Federation South East
Paragon Community Housing Group (inc. Elmbridge Housing Trust and Richmond upon Thames Churches Housing Trust)
Roger Bennett Housing Trust
Rosemary Simmons Memorial Housing Association
Southern Housing Group

Infrastructure
AMEC Environment & Infrastructure UK Limited
Mono Consultants Limited
Sustrans South East

Leisure
Barbara Currie Yoga
Ray Road Allotment Association
The Theatres Trust

Politics
Councillors
Alan Harvey Kopitko
Alan Palmer
Alex Coomes
Andrew Davis
Andrew Kelly
Barbara Cowin
Barry Cheyne
Barry Fairbank
Brian Fairclough
Chris Elmer
Chris Sadler
Christine Cross
Christine Elmer                          Bracknell Forest Borough Council
David Archer                           Buckinghamshire County Council
Dorothy Mitchell                       Cobham Garden and Horticultural
Elise Dunweber                         Association and Esher & Walton
Tannia Shipley                         Constituency Labour Party
Glenn P Dearlove                       Cobham, Downside, Oxshott & Stoke
Ian Donaldson                          D’Abernon Labour Party
Ivan Regan                             Ealing Borough Council
James Browne                           Elmbridge Borough Council - Pollution
James Vickers                          Team
Jan Fuller                             Epsom and Ewell Borough Council
Janet Turner                           East Molesey Conservatives
John Butcher                           Esher & Walton Conservative
John O’Reilly                          Association
John Sheldon                           EWCA
Karen Randolph                         London Borough of Barnet
Kim Cross                               Hampshire County Council
Lewis Brown                            Harrow Council
Liz Robertson                          Hart District Council
Lorraine Samuels                       Hillingdon Council
Manwinder Toor                        London Borough of Brent
Mary Marshall                          London Borough of Croydon
Mary Sheldon                           London Borough of Hounslow
Mike Bennison                          London Borough of Merton
Mike Axton                              London Borough of Sutton
Neil Luxton                            Reigate & Banstead Borough Council
Nigel Cooper                           Royal Borough of Windsor and
Nigel Haig-Brown                       Maidenhead
Peter Santo                            Rushmoor Borough Council
Rachael Lake                           Slough Borough Council
Ramon Gray                              South Bucks District Council
Richard Knight                         Surrey Heath Borough Council
Roy Green                               Tandridge District Council
Ruby Ahmed                              Waverley Borough Council
Ruth Bruce                              Wokingham Borough Council
Ruth Lyon                               Wycombe District Council
Ruth Mitchell                          Weybridge Liberal Democrats
Shweta Kapadia                         Sport
Simon Foale                            Claygate Martial Arts Centre
Simon Waugh                            Department for Culture Media and
Steve Bax                               Sport
Stuart Hawkins                         Metropolitan Police (Imber Court)
Stuart Selleck                         Sports Club
Tim Grey                                Sport England
Tim Oliver                              Utilities
Tricia Bland                           BPA (British Pipeline Association)
Victor Eldridge
Tourism  
Brooklands Museum Trust Ltd  

Transport  
First County Group  

Youth  
1st Hinchley Wood Scouts  
Claygate Village Youth Club  
Association  
Sunbury and Walton Sea Cadets
From: "Elmbridge Borough Council Consultations (do not reply)" <do-not-reply@consult.elmbridge.gov.uk>
Date: 12 October 2015 09:26:26 BST
To: XXXX
Subject: Flood Risk Supplementary Planning Document - Invitation to Join

Elmbridge Borough Council Consultations
Draft Flood Risk Supplementary Planning Document

You've been invited to participate in the Draft Flood Risk Supplementary Planning Document consultation by the Planning Policy team at Elmbridge Borough Council.

This consultation is open from 12 Oct 2015 at 09:00 to 9 Nov 2015 at 16:00.

The Council has published the Draft Flood Risk Supplementary Planning Document (SPD) for consultation. The SPD has been prepared to support Core Strategy Policy CS26: Flooding and policies within the Development Management Plan. It will help to ensure that flood risk to and from new development is fully taken into account and that appropriate information accompanies planning applications.

We would like to hear your views on this document.

The SPD and supporting documents can be viewed online: http://consult.elmbridge.gov.uk/consult.ti/FloodRiskSPD/consultationHome

If you have any queries please do not hesitate to contact the Planning Policy Team on 01372474474 or planningpolicy@elmbridge.gov.uk
Appendix 3: Formal Consultation Letter

Elmbridge Borough Council

Dear Sir/Madam,

Consultation on Draft Flood Risk Supplementary Planning Document (SPD)

The Council has published the Draft Flood Risk Supplementary Planning Document (SPD) for consultation. The SPD has been prepared to support Core Strategy Policy C330: Flooding and Pumps within the Development Management Plan. It will help to ensure that flood risk and flood management issues are fully taken into account and that appropriate information and advice accompanies planning applications.

The Council is consulting on the draft SPD between 12 October and 9 November 2015.

The SPD and supporting documents can be viewed online:

- at http://consult.elmbridge.gov.uk/consult/FloodRiskSPD/consultation/Home

A hard copy of the SPD can be viewed at:

- Elmbridge Borough Council, Civic Centre, High Street, Esher, KT10 9SD between 8.45am-5pm (Monday to Thursday) and 8.45am-4.45pm (Friday)
- All libraries in the Borough – see the Surrey County Council website – surreycc.gov.uk or call 0300 200 1001 for locations and opening hours

How to respond:

All comments/representations must be submitted by 4pm on 9 November 2015 and can be submitted via:

- Online consultation portal – http://consult.elmbridge.gov.uk/consult/FloodRiskSPD/consultation/Home
- Email to planningpolicy@elmbridge.gov.uk

- Post to the Planning Policy Team, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, KT10 9SD

When submitting comments/representations via email or post please use the “Representations Form” which can be downloaded via http://consult.elmbridge.gov.uk/consult/FloodRiskSPD/consultation/Home or contact the Planning Policy Team for a hard copy.

If you have any further queries please do not hesitate to contact the Planning Policy Team using the details above.

Yours faithfully,

Karen Fossett
Head of Planning Services
Appendix 4: Representation Form (Questionnaire)
Appendix 5: Consultation Homepage

Draft Flood Risk Supplementary Planning Document

What is it?
We have published the Draft Flood Risk Supplementary Planning Document (SPD) for consultation. The SPD has been prepared to support the implementation of Core Strategy Policy C.305: Flooding and Policies within the Development Management Plan.

It will help to ensure that flood risk is and from new development is fully taken into account and that appropriate information is included in Flood Risk Assessments that accompany planning applications.

It will help to ensure that where possible development is directed to areas of lowest flood risk but where development does take place in areas at risk of flooding that:

- it is safe;
- does not increase flood risk elsewhere; and
- where possible reduces risk overall.

Planning Services

Please note: Close reference is made throughout the SPD to the Strategic Flood Risk Assessment, which provides detailed information, including mapping, on flood risk across the Borough.

How can you get involved?

We are consulting on the SPD between 12 October and 9 November 2015.

Alternatively, hard copies are available at:

- Eridge Borough Council, Civic Centre, High Street, Esher, KT10 9SD
- All libraries in the Borough – see the Surrey County Council website – surreycouncil.gov.uk or call 0300 200 1041 for locations and opening hours

How can you respond?

All comments/representations must be submitted by 4pm on 9 November 2015.

Comments/representations can be submitted online by choosing one of the three options featured in the ‘Respond to this consultation’ section below.

Please note that if you choose to ‘Respond by making comments on the consultation document’ the SPD is divided into sections and there are consultation questions located at the end of each section (9 questions in total), which could be quite far down on the webpage. Please save your answers but be aware that there is no overall submit button. Questions can remain unanswered and this will not prevent you from moving onto another section/question. You will receive an e-mail for every question you answer.

Alternatively, comments can be submitted via:

- Email to planningpolicy@elbridge.gov.uk
- Post to Eridge Borough Council, Planning Services, Planning Policy, Civic Centre, Esher, KT10 9SD

When submitting comments/representations via e-mail or post please use the ‘Representations Form’ which can be downloaded below or contact the Planning Policy Team for a hard copy.

Next steps

Comments on the draft SPD will be analysed and, where appropriate, taken into account in the preparation of the final version of the SPD. This will go through the Council’s committee process (Cabinet and Council) to be formally adopted early in 2016.

Responses will be made public and a summary of the consultation findings will be made available on the website.

If you have any further queries please do hesitate to contact the Planning Policy Team on 01372 474474 or planningpolicy@elbridge.gov.uk

You may now respond to this consultation.

Consultation Documents
You may now respond to this consultation

Consultation Documents

• Draft Flood Risk Supplementary Planning Document
  15 Oct 2015 02:00

• Draft Flood Risk Supplementary Planning Document
  06 Oct 2015 13:11, 486 KB

• Statement of Representations Procedure
  06 Oct 2015 11:50, 227 KB

• SEA/HRA Determination Statement
  06 Oct 2015 08:55, 273 KB

• Strategic Flood Risk Assessment - Main Report Including Appendix A, E and F
  06 Oct 2015 13:26, 83 KB

• SFRA Appendix A, Figures B1-B4
  06 Oct 2015 13:27, 1.8 MB

• SFRA Appendix B, Figures B5-B9
  06 Oct 2015 13:26, 2.0 MB

• SFRA Appendix C, Figures C1-C6
  06 Oct 2015 13:26, 41 KB

• SFRA Appendix C, Figures C7-C13
  06 Oct 2015 13:26, 4.6 MB

• SFRA Appendix D, Figures D1-D6
  06 Oct 2015 13:26, 43 KB

• SFRA Appendix D, Figures D7-D13
  06 Oct 2015 13:26, 4.7 MB

Respond to this Consultation

You can respond to this consultation using any one of the options presented below.

• Respond by making comments on the consultation document
• Respond by filling in the online questionnaire

Consultation Links

• Sign up for notifications about this consultation

Consultation Summary

Name: Draft Flood Risk Supplementary Planning Document
Dates: From 12 Oct 2015 at 09:00 to 9 Nov 2015 at 16:00
Status: Open

Search A-Z of services

Contact us  Follow us  Supported by:  back to top
Appendix 6: Elmbridge Borough Council Homepage and Planning Policy Update webpage

Image of the Elmbridge Borough Council homepage.

Image of the Elmbridge Borough Council Progress Update webpage.

The content of the webpage is not provided in the images, but it is related to the Planning Policy Update for October 2015.
Consultation on the Draft Flood Risk Supplementary Planning Document (SPD)

Elmbridge Borough Council has published a draft SPD on Flood Risk for consultation. The consultation starts on Monday 12 October at 9am.

This document will help ensure that flood risk to and from new development is fully taken into account and that appropriate information is included in Flood Risk Assessments that accompany planning applications.

More information about the consultation can be found at consult.elmbridge.gov.uk.

Alternatively you can view the SPD at the Civic Centre, between 8.45am- 5pm (Monday to Thursday) and 8.45am- 4.45pm (Friday).

All comments must be received by 4pm on Monday 9 November 2015. You can submit your comments in a number of ways:

- Online: consult.elmbridge.gov.uk
- Email: planningpolicy@elmbridge.gov.uk
- In writing: The Planning Policy Team, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD

For further information please call 01372 474474 or email planningpolicy@elmbridge.gov.uk
Appendix 8: Poster for all Borough Noticeboards

Elmbridge Borough Council has published a draft SPD on Flood Risk for consultation.

This document will help ensure that flood risks and from new development is fully taken into account and that appropriate information is included in Flood Risk Assessments that accompany planning applications.

More information about the consultation can be found at consult.elmbridge.gov.uk.

Alternatively you can view the SPD at the Civic Centre between 8.45am - 5pm (Monday to Thursday) and 8.45am - 4.40pm (Friday).

All comments must be received by 4pm on Monday 9 November 2015. You can submit your comments in a number of ways:

- Online: consult.elmbridge.gov.uk
- Email: planningpolicy@elmbridge.gov.uk
- In writing: The Planning Policy Team, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9BD

For further information please call 01372 474474 or email planningpolicy@elmbridge.gov.uk

Produced by Planning Services October 2015

Appendix 9: Tweets

- 12 Oct
  Elmbridge BC
  Let us know your views on the draft Flood Risk Supplementary Planning Document by 9 November 2015 at bit.ly/1EKp6Lb

- 2 Nov
  Elmbridge BC
  Last chance to have your say on the draft Flood Risk SPD at bit.ly/1EKp6Lb - deadline 4pm on 9 November 2015
Appendix 10: Statement of Representations Procedure

Elmbridge Borough Council
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012

Regulation 12 Public Participation
Draft Flood Risk Supplementary Planning Document Statement of Representations Procedure
October 2015

Supplementary Planning Documents (SPDs) may be prepared to provide greater detail on the Local Development Plan Document (LDPD) policies. The National Planning Framework (NPF) supports the production of SPDs where they can help applicants to make successful applications.

The Draft Flood Risk Supplementary Planning Document (SPD) has been prepared to support Core Strategy Policy C5: Flood and flooding policies within the Development Management Plan. It will help to ensure that flood risk is and from new development is fully taken into account and that appropriate information accompanies planning applications.

Consultation

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, the SPD is subject to public consultation as detailed below.

The Council is consulting on the draft SPD between 12 October and 60 November 2015.

The Planning Service maintains a database of statutory stakeholders and duty to cooperate bodies and non-statutory consultees. Letters or emails have been sent out to notify consultees of the consultation period and to let them know where to find further information and how to make representations. The individual SPD web page provides details of the consultation:
http://consult.elmbridge.gov.uk/consult/tp.FloodRiskSPDConsultationHome

Copies of the Documents

The SPD and supporting documents can be viewed online:

- Online consultation portal:
  http://consult.elmbridge.gov.uk/consult/tp.FloodRiskSPDConsultationHome

A hard copy of the SPD can be viewed at:

- Elmbridge Borough Council, Civic Centre, High Street, Esher, KT10 9SF between 8.45am-5pm (Monday to Thursday) and 8.45am-4.45pm (Friday)

- All libraries in the Borough – see the Surrey County Council website – www.surreycc.gov.uk or call 0800 328 1051 for locations and opening hours.

Representation

All comments/representations must be submitted by 4pm on 30 November 2015 and can be submitted via:

- Email to representations@elmbridge.gov.uk
- Post to Planning Policy, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, KT10 9SF

When submitting comments/representations via email or post please use the Representations Form which can be downloaded via:
http://consult.elmbridge.gov.uk/consult/tp.FloodRiskSPDConsultationHome or contact the Planning Policy Team for a hard copy.

Responses will be made public and a summary of the consultation findings will be made available on the website.

For further information, email representations@elmbridge.gov.uk, or telephone 01372 474474

Produced by: Planning Services - October 2015
Appendix 11: Schedule of Representations received following the Draft Flooding SPD Consultation

The first question asks whether the respondent wishes to be notified of the adoption of the Flood Risk SPD. The bodies that wish to be notified are detailed at appendix 1.

<table>
<thead>
<tr>
<th>Respondent Name</th>
<th>Organisation/ Resident Population</th>
<th>Response</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alan Byrne</td>
<td>Historic England</td>
<td>Thank you for the opportunity to comment on the above document. Historic England has no comments to make on the draft Flood Risk SPD at this time.</td>
<td>Noted</td>
</tr>
<tr>
<td>Amanda Purdy</td>
<td>Civil Aviation Authority</td>
<td>Elmbridge District is outside of our 15km safeguarding circle, being the area that we would be concerned with regard to flood attenuation and drainage schemes that may attract birds. Elmbridge is only situated within our 30km wind turbine safeguarding circle and therefore we would only wish to comment on any proposals/policies that include wind turbines.</td>
<td>Noted</td>
</tr>
<tr>
<td>Andrew Hiley</td>
<td>Transport for London</td>
<td>Thank you for consulting TfL Borough Planning. I have no comments on the draft SPD.</td>
<td>Noted</td>
</tr>
<tr>
<td>Hannah Cook</td>
<td>Spelthorne Borough Council</td>
<td>Thank you for consulting Spelthorne Borough Council on the Elmbridge Borough Council Draft Flood Risk SPD. We do not have any comments on the document.</td>
<td>Noted</td>
</tr>
<tr>
<td>James McCabe</td>
<td>Wokingham Borough Council</td>
<td>Thank you for consulting Wokingham Borough Council on the Elmbridge Draft Flood Risk Supplementary Planning Document. WBC has no comment to make with regard to the Document.</td>
<td>Noted</td>
</tr>
<tr>
<td>John Cheston</td>
<td>Mid Sussex District Council</td>
<td>Thank you for the invitation to comment on your Draft Flood Risk SPD. I am pretty sure that this will have no planning implications for Mid Sussex District.</td>
<td>Noted</td>
</tr>
<tr>
<td>Mike Waite</td>
<td>Surrey Wildlife Trust</td>
<td>We have viewed the document and find it generally helpful. We particularly welcome the inclusion/detail of</td>
<td>Noted</td>
</tr>
</tbody>
</table>
| Gillian Fensome | Natural England | Natural England does not consider that this draft SPD poses any likely or significant risk to those features of the natural environment for which we would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. | Noted |
| Simon Vince | Heathrow Airport Limited | Elmbridge Borough Council falls within the Aerodrome Safeguarding consultation areas for Heathrow Airport. Within this area the Planning Authority must consult the Airport Operator on development where the height of any building, structure, erection or works would affect the operation of the airport or the safe movement of aircraft i.e. potentially penetrate the protected surface.

The aerodrome uses a variety of navigational aids, radio aids and telecommunications systems to facilitate air traffic control and aircraft movements. A new building, structure or extension because of its size, shape, location or construction materials can affect this equipment so the aerodrome must also be consulted to enable an assessment to be made of the potential impact on navigational aids.

At night and in low visibility conditions pilots rely on approach and runway lights to align their plane with the runway and touch down at the correct point. Lighting elements of a development also have the potential to distract or confuse pilots, particularly in the immediate vicinity of the aerodrome and the aircraft approach paths. Safeguarding assessments therefore also consider the impact of lighting proposals for developments.

The objective of the safeguarding process is to prevent any increase, and where possible reduce risk to the lowest practicable level, by designing out bird hazards. | Noted. Not considered relevant to the remit of the SPD. Noted. Not considered relevant to the remit of the SPD. Noted. Schemes which include the provision of large ponds and detention basins are likely to require the approval of the Local Lead Flood Authority (Surrey |
The developments likely to cause most concern are: ... the creation of areas of standing water in quarries, sewage works, nature reserves, lakes, ponds, wetlands and sustainable urban drainage systems. County Council) who would assess the suitability of any proposed system. However, it is considered useful to highlight this possible constraint within the SPD given the Borough’s proximity to Heathrow Airport.

<p>| Peter Almond | Resident | Provides a numbers of letters/e-mail correspondence to and from the EA in the response and states: Flood risk modeling for the River Rythe needs to be completed. There is no high probability of flooding at my property or for most of my neighbours. The flood records for the last flood in 1968 are conflicting and imprecise. Flood defences have been put in place since the last flood and thus the risk is reduced. The current flood risk maps are wrong. Communication between Elmbridge, the EA and SCC to understand why adequately detailed FRAs could not be produced is not acceptable as it down to the lack of / poor data from the EA. Insurance companies should be told there is no flood risk in the area and should not be able to refuse to insure areas. Any study of the Rythe that does show that properties in Heathside are in the High risk of flooding category must be inspected by independent engineers and the parties affected. |
| Chris Colloff | Thames Water Property Services | Within the glossary reference is made to the DG5 register. The definition given the impression that the register lists at risk properties event if flooding hasn't occurred. This is not the case, the register records Noted. Amendment made |</p>
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ian Donaldson</td>
<td>Molesey Resident’s Association</td>
<td>Supports the views of Cllr Mike Axton and Mr Gerald McAully. Please see their responses for details.</td>
</tr>
<tr>
<td>Sue Janota</td>
<td>Surrey County Council</td>
<td>The diagram on p.6 (Figure 1) of the PDF is a good summary / awareness of the development and flood risk. The diagram could do with being expanded in size so that it is easy to read. Page 7 of the PDF: What are the implications of Flood Risk for development?” – In new developments the following text could be added - “where possible to manage surface water run-off on site.” Page 44: In general, reference Surrey County Council website links e.g. Surrey LFRMS. Risk from all sources should be considered i.e. fluvial, groundwater and surface water. Appendix 2, page 51: Flood Risk Assessment Proforma: please check the links in the Reference to FRA section. Please add the SuDS proforma and provide a link to the Surrey County Council website: <a href="http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice">http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice</a> Page 54: Need to clarify that the BGS licence is ok on SFRA appendix maps.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Noted</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Agreed. Amendment made</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Agreed. Amendment made</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Noted</td>
</tr>
<tr>
<td>Name</td>
<td>Organization</td>
<td>Comment</td>
</tr>
<tr>
<td>--------------------</td>
<td>----------------------------------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Tony Howe</td>
<td>Surrey County Council</td>
<td>This is a brief response to indicate that I have no comments to make on the text or the contents of the document itself. As a general observation, some flood alleviation proposals may in the future impact upon Elmbridge's Heritage Assets or archaeology, especially if they involve ground disturbance. On a case-by-case basis, this impact should be examined through the appropriate assessment procedures, as set out in the relevant section(s) and policies of the Elmbridge Borough Council Local Plan.</td>
</tr>
<tr>
<td>Jack Moeran</td>
<td>Environment Agency</td>
<td>Welcome this Supplementary Planning Document covering Flood Risk. Please that it is well structure, easy to understand and that the tone of language used and terminology is accessible. Use of bold text to highlight the main point is useful, as is the sign posting to relevant documents where further information can be obtained from. Advise it may be prudent for these links and references to be checked at time to ensure they remain up to date and relevant. Provision of a FRA pro-forma offers a way for applicants to approach the FRA process in a methodical and informed manner</td>
</tr>
<tr>
<td>Ray Spary</td>
<td>The Weybridge Society</td>
<td>Partly- It should be clear that by using the single word “development” it means all of the following: New building, Extension of existing building, Rebuild of existing building, Any changes to garden heights, driveways, patios, walls, materials used, layout of area, Any changes of flood flow or capacity. Agree in part. Definitions of the types of development have been clarified in Part 2.1 of the SPD. It should be noted that the definition of ‘development’ is restricted by that set in the Town and County Planning Act 2004 (as amended).</td>
</tr>
</tbody>
</table>

**Question 2 – How to Use this Supplementary Planning Document**

Do you support the content of this chapter?

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paul Killick</td>
<td>Weyside Marine Services</td>
<td>Yes</td>
</tr>
<tr>
<td>Revd Johnson</td>
<td>All Saints Weston Green Church</td>
<td>Yes</td>
</tr>
<tr>
<td>Ray Spary</td>
<td>The Weybridge Society</td>
<td>Partly- It should be clear that by using the single word “development” it means all of the following: New building, Extension of existing building, Rebuild of existing building, Any changes to garden heights, driveways, patios, walls, materials used, layout of area, Any changes of flood flow or capacity. Agree in part. Definitions of the types of development have been clarified in Part 2.1 of the SPD. It should be noted that the definition of ‘development’ is restricted by that set in the Town and County Planning Act 2004 (as amended).</td>
</tr>
</tbody>
</table>
Please note that the word "development" is not defined in the Glossary.

<table>
<thead>
<tr>
<th>M R Sullivan</th>
<th>Wey Road and Round Oak Road Residents Association</th>
</tr>
</thead>
<tbody>
<tr>
<td>Partly: The term &quot;development&quot; should be specifically defined (perhaps in the Glossary) to include re-development and include any of the following: “Any new building, any extension to, or re-construction of, an existing building, any change in existing ground level, and/or any change in the storage, and/or flow, of flood water.” This will ensure that large extensions, and the cumulative effect of smaller ones, are prevented from decreasing a floodplain, and from causing additional impedance, both to the detriment of immediate neighbours in particular, and the community in general. Definition of ‘minor development’ should be reduced to 25m² or 5% increase in footprint in zones 2 &amp; 3. Footnote 8: curtilage to be changed to footprint.</td>
<td></td>
</tr>
</tbody>
</table>

Agree in part. Definitions of the types of development have been clarified in Part 2.1 of the SPD. It should be noted that the definition of ‘development’ is restricted by that set in the Town and County Planning Act 2004 (as amended). The definition does include the erection of outbuildings within the curtilage of dwelling which would be used for purposes incidental to the use of the existing dwellinghouse. The definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling and advises that this would include the subdivision of a house into flats. The wording of the footnote has been revised to make this clearer. Noted. It considered that this is implied within the text, however the proposed measures will be considered on a site by site basis. |

Appendix 3, paragraph 2: there should not be a sole reliance on the incorporation of flood reliance / resistance measures designed for the protection of property and residents alone, as total flood risk mitigation. This should be clarified in the text. Appendix 3, paragraph 4: Deletion of double negative ‘not impeding flows’. As it stands, the policy leaves open to argument whether or not sufficient effort has been made to

Agree. Amendment made

Noted. The onus is on the applicant to demonstrate
incorporate flood mitigation measures. Suggest that policy should require underfloor voids to be incorporated where a proposed development will result in more than a 5% increase in existing footprint, or 25m², whichever be the greater, and where no equally-compensatory measures have been include. that every effort has been made. This will be assessed by the Council on a case by case basis.

<table>
<thead>
<tr>
<th>Cllr Axton</th>
<th>Molesey Residents Association</th>
<th>Yes</th>
<th>Support noted</th>
</tr>
</thead>
</table>

Jack Moeran

Environment Agency

Under the heading `What is a Flood Risk Assessment` the paragraph starts off with FRA. Although reader should understand the abbreviation, might be useful to state Flood Risk Assessment followed by the abbreviation so it's clear.

Repetition of River Wey in 'what are the types of flood risk in Elmbridge' paragraph.

Useful to include Annual Exceedance probability (AEP) event within the descriptions of the Flood Zones.

Change ‘an’ for ‘a’ in front of FRA in ‘What are the implications of flood risk for developers paragraph’.

<table>
<thead>
<tr>
<th>Respondent Name</th>
<th>Organisation/Resident</th>
<th>Response</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Raymond Spary</td>
<td>Weybridge Society</td>
<td>Yes. No Comment.</td>
<td>Support noted</td>
</tr>
<tr>
<td>Mr R O’Sullivan</td>
<td>Wey Road and Round Oak Road Residents Association</td>
<td>Yes. None</td>
<td>Support noted</td>
</tr>
<tr>
<td>Ms N Nockles</td>
<td>Resident</td>
<td>No. Environmental Agency's revised maps of flood risk (Rivers and Sea) for the Lower Thames (Hurley to Teddington) will not be published until the Spring of</td>
<td>The SPD provides further detail and guidance on the Council’s approach to new development and flood risk. It does not specifically identify the areas of risk</td>
</tr>
</tbody>
</table>
2016. Until that is issued any consultation on flood risk is irrelevant. See Page 22 of Draft Flood Risk SPD, Table 11, “Providing information for Lower Thames, Hurley to Teddington”, dated October 2015

Please note my questions: What effect will the planned phasing out of the Thames Barrier have on the risk of flooding for the lower reaches of the River Thames and Elmbridge?

And

As the Environment Agency states, "Local Planning Authorities (LPAs) prepare SFRAs (Strategic Flood Risk Assessment) in consultation with the Environment Agency and other stakeholders to determine local flood risk. Where is the EA’s Assessment for our area? ref Environment Agency TE2100 Plan

within the Borough. However, sign posts to where the most recently published mapping can be found (EA website and the Council’s SFRA).

The Council’s SFRA (2015) is a ‘living document’ acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.

This is currently undertaken on a quarterly basis and a rolling programme of detailed flood risk mapping is underway.

The Environment Agency is currently developing a new model for the River Rythe and remodelling the Lower Thames between Hurley and Teddington and the Middle Mole. This will improved the current knowledge of flood risk within the Borough, and may marginally alter predicted flood extents in the future.

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>Miss G Pacey</td>
<td>Runnymede Borough</td>
<td>Yes</td>
</tr>
<tr>
<td>Mr Temple</td>
<td>Brooklands Museum Trust</td>
<td>Yes</td>
</tr>
<tr>
<td>Mr Cooke</td>
<td>Thames Ditton &amp; Weston Green Residents Association</td>
<td>Yes</td>
</tr>
<tr>
<td>Cllr Axton</td>
<td>Molesey Residents Association</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Question 4 - Section 1.2: Policy framework and guidance**

**Do you support the content of this chapter?**

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Raymond Spary</td>
<td>Weybridge Society</td>
<td>Partly. Table 1 - Flood risk management role and responsibilities. Elmbridge Borough Council should also be responsible to monitor and control the development to ensure it is completed correctly and not subsequently amended.</td>
</tr>
</tbody>
</table>

Support noted
Where is the detail to show how SuDS is to be provided in new builds or extensions of various sizes in various locations. It should not be limited to areas of flood risk.

Policy CS26 states that ‘all development within Flood Zones 2 and 3 will require surface water runoff to be controlled, as near to its source as possible and at green field rates’. Paragraphs 2.5.37-2.5.46 of the Draft SPD provides guidance on surface water management and includes details on SuDS techniques. The advice contained within this section of the SPD can be applicable to development of all scales and to sites located outside of areas of flood risk. For sites outside of areas of risk of flooding, Surface Water Drainage details are required for Major development.

Policy CS26 states that ‘all development within Flood Zones 2 and 3 will require surface water runoff to be controlled, as near to its source as possible and at green field rates’. Paragraphs 2.5.37-2.5.46 of the Draft SPD provides guidance on surface water management and includes details on SuDS techniques. The advice contained within this section of the SPD can be applicable to development of all scales and to sites located outside of areas of flood risk. For sites outside of areas of risk of flooding, Surface Water Drainage details are required for Major development.

Mr R O’Sullivan
Wey Road and Round Oak Road Residents Association
Partly. For all development in Flood Zones 2 & 3, a post-completion inspection should be included as a final stage in the building control process to ensure compliance with an approval, particularly to sign off that all conditions pertaining to flood risk have been met.

The Council has Planning Enforcement powers that it can use when there is a breach in planning control. The Council does not actively monitor individual developments, however investigates potential breaches of conditions that have been brought to the Council’s attention.

Ms N Nockles
Resident
Partly.

Support noted

Miss G Pacey
Runnymede Borough
Yes.

Support noted

Mr Temple
Brooklands Museum Trust
Yes

Support noted

Mr Cooke
Thames Ditton & Weston Green Residents Association
Yes

Support noted

Cllr Axton
Molesey Residents Association
Yes

Support noted

Sue Janota
Surrey County Council
1.2.6: Core Strategy: The risk from flooding is from all sources; combination of fluvial, surface water and groundwater.

Agreed. Amendment made.

Jack Moeran
Environment Agency
Page 5 Table 1 – Environment Agency is also a statutory consultee in the planning process to the River Management Authorities (RMAs) this should be included as a bullet point under ‘Role in relation to flood risk’ column

Agreed. Amendment made.
<table>
<thead>
<tr>
<th><strong>Question 5 - Section 2.1: Flood risk and the planning process</strong></th>
<th><strong>Do you support the content of this chapter?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mr Raymond Spary</strong>&lt;br&gt;Weybridge Society</td>
<td>Partly. Table 7 needs to be revised as it is very confusing and indicates possible developments that will cause flooding elsewhere.</td>
</tr>
<tr>
<td>1. Minor development. This note needs to be restructured, it gives all sorts of possible challenges to the meaning of the SPD. The use of the words &quot;(excluding minor development)&quot; should not be used. Minor needs to be defined at a tenth of the size i.e. 25 sqm as it gives the indication that 250 sqm has an insignificant effect on flooding. As for the rest of the note I am not sure what it means, a note should deal with just one subject.</td>
<td></td>
</tr>
<tr>
<td><strong>Mr R O’Sullivan</strong>&lt;br&gt;Wey Road and Round Oak Road Residents Association</td>
<td>Seek the improvement in the requirement for, the quality before acceptance of, and the consideration given to, Flood Risk Assessments submitted as part of the planning process, particularly where such applications fall within the Environment Agency's definition of “Minor development”, where only standing advice is available.</td>
</tr>
<tr>
<td>Partly. A) 2.1.2 (Note 3 - Definition of &quot;Minor Development&quot;): The term &quot;curtilage&quot; used in the final sentence should be amended to &quot;footprint&quot;. The intention here is to allow the sub-division of an existing building without any increase to its footprint. As it stands, the Note would FAIL TO EXCLUDE the development of a separate dwelling anywhere within the boundary of an entire site i.e. its curtilage. Development and re-development should be treated in exactly the same manner as each other in the planning and inspection processes.</td>
<td></td>
</tr>
<tr>
<td><strong>Noted.</strong> The role of the SPD is to provide guidance to applicants to assist them providing sufficient information within their FRAs. The proficiency or otherwise of the submitted information will be assessed along with other material planning considerations during the determination of the application. It is not appropriate to assess the quality of the information submitted at the validation stage.</td>
<td></td>
</tr>
<tr>
<td>Noted. The definition of ‘minor development’ in relation to flood risk is set by Government within the National Planning Practice Framework. The final SPD will refer to ‘small scale development’ rather than ‘minor development’, to avoid confusion with the classifications of development for the purposes of planning applications. Section 2.1 of the SPD has been revised to include definitions of development types.</td>
<td></td>
</tr>
<tr>
<td>Noted. The distinction needs to be made to prevent the unnecessary ‘blighting’ of existing developed areas within the 1 in 20 year flood outline.</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Role</td>
</tr>
<tr>
<td>----------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Ms N Nockles</td>
<td>Resident</td>
</tr>
<tr>
<td>Miss G Pacey</td>
<td>Runnymede Borough</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
in the flood zones if the sequential and/or exception tests are first passed. This could be a bit misleading for the reader. Perhaps it would be helpful to clarify that table 7 contains the types of appropriate development in each flood zone and in addition the types of development that may also be acceptable but only if they first pass the relevant tests. In table 7 it may be helpful to split the types of development referenced into appropriate and may be acceptable if the relevant tests are first passed. In regard to the latter better cross referencing to chapter 2.4 could be helpful.

Table 8 is helpful.

| Mr Temple | Brooklands Museum Trust | Partly. Brooklands Museum would be concerned about any effect that the restrictions envisaged on development in Zone 3b could have on the financial and heritage sustainability of the Museum (eg being able to move vulnerable exhibits under cover) | Noted. Applications will be assessed on a case by case basis. Section 3.3 of the SPD provides advice on the Sequential and Exception Tests. It is advised that any forthcoming application is supported by a sufficient Flood Risk Assessment. |
| Mr Cooke | Thames Ditton & Weston Green Residents Association | No. Re para 2.1.8  In general, we believe that the guidance under all headings conflicts with the Core Strategy Policy in that it suggests that development in areas subject to flooding will only be challenged in the most extreme circumstances. It also fails to provide officers with guidance as to what cumulative risks might suggest that an application should be rejected. The wording as suggested is open to far too much interpretation and this will increase the likelihood of appeals against adverse decisions by developers and consequent increased costs to the Council.  In particular, the expression – ‘Regard will be had to whether the site is also affected by groundwater flooding’ - this wording will not provide officers with any sort of a yardstick to enable them to make decisions that are in line with the overriding Core Strategy.  Our greatest concern is over the wording in the section | The document is to assist applicants in understanding how the Council will implement CS26 and consider flood risk as part of the planning application process. It provides information on identifying flood risk and provides a toolkit for preparing a Flood Risk Assessment (FRA). It is only through the FRA that potential impact of a development on flooding can be understood.  This is especially important for small- scale developments in areas at risk from flooding from rivers and/or other sources where the local requirements of the Core Strategy and the SPD, informed by the SFRA, exceed that of national guidance and EA standing advice.  Each planning application is assessed on its own merit. It is not possible for all policy and guidance to be prescriptive and that with all planning matters there |
‘Flood Zone 3a (High Probability)’. The wording here seems to suggest that residential development is likely to get the green light by use of the wording - More Vulnerable development can be considered - Our preferred option would be to exclude residential development in these areas altogether however, if this is not to be the case there has to be a more defined approach to this area. A better wording would, we feel be - More Vulnerable development might be considered in very exceptional circumstances – or something along these lines.

Re para 2.1.19

We feel that applicants should be reminded that whilst they are encouraged to engage in pre-application dialogue, all planning applications are, potentially, subject to approvals by the Area Planning Sub-Committees and the Planning Committee. We feel this is important to protect the Council from potential claims for costs at Appeal Hearings. Much of the judgement in relation to these matters is subjective and the fact that an officer may fail to recognise risks associated with an application will not prevent an elected representative of the Council bringing their own, local knowledge and experience to bear.

Agreed. Amendment made. All pre-application advice issued by the Council is done so without prejudice to any future decision made the Council. This is clearly set out within the Council’s pre-application correspondence and service charter.

Re para 2.1.8

In general, we believe that the guidance under all headings conflicts with the Core Strategy Policy in that it suggests that development in areas subject to flooding will only be challenged in the most extreme circumstances. It also fails to provide officers with guidance as to what cumulative risks might suggest that an application should be rejected. The wording as suggested is open to far too much interpretation and this will increase the likelihood of appeals against adverse decisions by developers and consequent costs. The document is to assist applicants in understanding how the Council will implement CS26 and consider flood risk as part of the planning application process. It provides information on identifying flood risk and provides a toolkit for preparing a Flood Risk Assessment (FRA). It is only through the FRA that potential impact of a development on flooding can be understood.

This is especially important for small-scale developments in areas at risk from flooding from rivers.
increased costs to the Council.

In particular, the expression – ‘Regard will be had to whether the site is also affected by groundwater flooding’ - this wording will not provide officers with any sort of a yardstick to enable them to make decisions that are in line with the overriding Core Strategy.

Our greatest concern is over the wording in the section ‘Flood Zone 3a (High Probability)’. The wording here seems to suggest that residential development is likely to get the green light by use of the wording - More Vulnerable development can be considered - Our preferred option would be to exclude residential development in these areas altogether however, if this is not to be the case there has to be a more defined approach to this area. A better wording would, we feel be - More Vulnerable development might be considered in very exceptional circumstances – or something along these lines.

Re para 2.1.19

We feel that applicants should be reminded that whilst they are encouraged to engage in pre-application dialogue, all planning applications are, potentially, subject to approvals by Area Planning Committees and/or Full Council. We feel this is important to protect the Council from potential claims for costs at Appeal Hearings. Much of the judgement in relation to these matters is subjective and the fact that an officer may fail to recognise risks associated with an application will not prevent an elected representative of the Council bringing their own, local knowledge and experience to

and /or other sources where the local requirements of the Core Strategy and the SPD, informed by the SFRA, exceed that of national guidance and EA standing advice.

Each planning application is assessed on its own merit. It is acknowledged that it is not possible for all policy and guidance to be prescriptive and that with all planning matters there will be an element of interpretation.

By ensuring that the right information is set out in any FRAs supporting an application, the Council will be able to consider the potential impacts of development in relation to flood risk with more accurately and on a site specific basis.

Officers have clarified within the SPD that the completion of an FRA will not automatically mean that the development is acceptable in flood risk terms.

The vulnerability classifications and the triggers for an Exceptions Test are set within national planning policy and guidance to which the Council should adhere to in its formulation of the Local Plan and when determining planning applications.

Agreed. Amendment made. All pre-application advice issued by the Council is done so without prejudice to any future decision made the Council. This is clearly set out within the Council’s pre-application correspondence and service charter.
<p>| Chris Colloff Thames Water Property | In relation to surface water management, should development proposals indicate that all other means of surface water disposal have been exhausted and the developer intends to discharge to the public network then Thames Water should be consulted. In relation to consultation with Thames Water, the document 'Water Services Infrastructure Guide for Local Planning Authorities' sets out the type of applications that Thames Water would want to be consulted on and the information that would be required. | Noted |
| Sue Janota Surrey County Council | Table 8: Future Surrey County Council development: More information regarding the pre-application planning process will be provided by the County Council at a later date. | Noted |
| Jack Moeran Environment Agency | Page 12, 2.1.8, Table .7- Repeat use of word ‘not’ in FZ3b description Page, 14, 2.1.15 With respect to Flood Defence Consent, any works in, over or under the channel of a main river or within eight metres of the top of the bank or landward toe of any flood defences require the Environment Agency’s prior Consent. The 20m is the distance from a main river that the Environment Agency is consulted on under Flood Risk Standing Advice. 2.1.17 Last bullet point, this again refers to Flood Defence Consent being required for any development within 20m of a main river. Please see the above comment for Section 2.1.15. Page 17, Table 9. Flood Defence Consent is required for any works within 8m of a main river, but also for any works in, over or under the channel of a main river. If a watercourse benefits from the presence of flood defences, the Byelaw width is measured to be 8m landward from the toe of the flood defences. | Agreed. Amendment made. |</p>
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Comment</th>
<th>Agreement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Raymond Spary</td>
<td>Weybridge Society</td>
<td>2.2.2 Need to add height as being one of the most important data requirements.  Too much account is being made of “vulnerability of its users” this is far less important than the overall effect of the change of flood risk to the area. If you are to consider this risk then you need to discuss and define for instance safe access and escape. Assume this refers to ground level, rather than height. Agreed amendment made. The vulnerability classifications are set within the national Planning Practice Guidance. The classification of the proposed use/s is a key factor in determining whether a proposal is appropriate or will require an exceptions test. Section 3.4 provides guidance on a range of measures to manage and mitigate flood risk to ensure the development is safe for its lifetime; does not increase the risk of flooding elsewhere and where possible, reduces flood risk overall. The SPD requires FRAs to include a plan showing proposed safe access/egress and / or safe refuge.</td>
<td></td>
</tr>
<tr>
<td>Mr R O'Sullivan</td>
<td>Wey Road and Round Oak Road Residents Association</td>
<td>Partly. There is still too much emphasis on the protection of property and/or residents over the need to control the effect of changes in flood risk caused by development. There seems to be no requirement to take existing ground levels into consideration. The remit of the SPD is to assist applicants understand how the Council will implement planning policies and consider flood risk as part of a planning application. Core Policy CS26 firstly seeks to direct new development to the lowest possible flood zone. The introduction, Parts 2.1 and 3.3 of the SPD have been amended to place greater emphasis on this element of the policy. Agreed amendment (3.1.2 Site Information).</td>
<td></td>
</tr>
<tr>
<td>Ms N Nockles</td>
<td>Resident</td>
<td>Environmental Agency's revised maps of flood risk (Rivers and Sea) for the Lower Thames (Hurley to Teddington) will not be published until the Spring of 2016. Any/all site information and proposed development is premature until flood risks for Thames (Hurley to Teddington) are revised and published by the Environment Agency. The SPD provides further detail and guidance on the Council’s approach to new development and flood risk. It does not specifically identify the areas of risk within the Borough. However, sign posts to where the most recently published mapping can be found (EA website and the Council's SFRA). The Council's SFRA (2015) is a ‘living document’.</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Organisation</td>
<td>Support</td>
<td>Notes</td>
</tr>
<tr>
<td>----------------------</td>
<td>---------------------------------------------</td>
<td>---------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Miss G Pacey</td>
<td>Runnymede Borough</td>
<td>Yes</td>
<td>Support noted</td>
</tr>
<tr>
<td>Mr Temple</td>
<td>Brooklands Museum Trust</td>
<td>Yes</td>
<td>Support noted</td>
</tr>
<tr>
<td>Mr Cooke</td>
<td>Thames Ditton &amp; Weston Green Residents Association</td>
<td>Yes</td>
<td>Support noted</td>
</tr>
<tr>
<td>Cllr Axton</td>
<td>Molesey Residents Association</td>
<td>Yes</td>
<td>Support noted</td>
</tr>
</tbody>
</table>

**Question 7 - Section 2.3: Part 3 of FRA: Assessing flood risk**

**Do you support the content of this chapter?**

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
<th>Support</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Raymond Spary</td>
<td>Weybridge Society</td>
<td>Partly</td>
<td>Noted. The SPD advises that ‘in accordance with national policy, existing building footprints where they can be demonstrated to exclude floodwater will not be defined as Functional Floodplain’. This will be determined on a case by case basis. Development proposed in such sites (subject to sequential and exceptions testing, as applicable) should demonstrate how the proposal will be made safe, will not increase flood risk elsewhere and where possible will reduce flood risk overall.</td>
</tr>
<tr>
<td>Mr R O’Sullivan</td>
<td>Wey Road and Round Oak Road Residents Association</td>
<td>Partly</td>
<td>Noted. The SPD advises that ‘in accordance with national policy, existing building footprints where they can be demonstrated to exclude floodwater will not be defined as Functional Floodplain’. This will be determined on a case by case basis. Development proposed in such sites (subject to sequential and exceptions testing, as applicable) should demonstrate how the proposal will be made safe, will not increase flood risk elsewhere and where possible will reduce flood risk overall.</td>
</tr>
<tr>
<td>Ms N Nockles</td>
<td>Resident</td>
<td>No.</td>
<td>Environmental Agency's revised maps of flood risk (Rivers and Sea) for the Lower Thames (Hurley to The SPD provides further detail and guidance on the Council’s approach to new development and flood</td>
</tr>
<tr>
<td>Name</td>
<td>Organization</td>
<td>Response</td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Miss G Pacey</td>
<td>Runnymede Borough</td>
<td>Yes. 2.3.29 Is any part of Elmbridge also at risk from flooding from reservoirs that are located outside the Borough boundary? If so it may be helpful to confirm this here. Agree. Amendment made. The Environment Agency dataset 'Risk of Flooding from Reservoirs' shows that the northern fringe of Walton on Thames Settlement Area could be flooded if the Queen Mary Reservoir located within the neighbouring borough of Spelthorne was to fail and release the water it holds. It should be noted that due to the active management and regular maintenance of these structures, there is a very low risk of the reservoirs failing.</td>
<td></td>
</tr>
<tr>
<td>Mr Temple</td>
<td>Brooklands Museum Trust</td>
<td>Yes. Brooklands Museum is concerned that the SFRA does not fully record the presence of, and importance of, the flood compensation works which were required for the development of Mercedes-Benz World in 2004-6, and the impact that those works should have on potential flooding in the Brooklands area. Noted. This would need to be addressed in any forthcoming site specific FRA.</td>
<td></td>
</tr>
</tbody>
</table>
| Mr Cooke            | Thames Ditton & Weston Green Residents Association     | Partly. Re para 2.3.11  

*The Environment Agency is currently undertaking a modelling study for the River Rythe*  
We would like to see some target date for completion of this work. Refer to the Environment Agency. |
| Cllr Axton          | Molesey Residents Association                         | Partly. Re para 2.3.11  

*The Environment Agency is currently undertaking a modelling study for the River Rythe*  
We would like to see some target date for completion of this work. Refer to the Environment Agency. |
| Chris Colloff | Thames Water Property Services Ltd | Partly. The text reminding applicants to liaise with Thames Water about connections to the sewer system is supported. However, it should be noted that development in areas where there is no historic sewer flooding could potentially lead to sewer flooding either on site or elsewhere in the catchment. Thames Water welcomes the opportunity to take part in pre-submission discussions with all developers. Such discussions will help to identify and resolve possible problems before an application is submitted and should ensure that the response period is minimised when formal consultation is undertaken by the LPA. | Noted |
| Sue Janota | Surrey County Council | 2.3.2.2: This information is available from the EA surface water uFMfSW dataset. | Agreed. Reference made. |
| Jack Moeran | Environment Agency | Page 20, 2.3.8, Please change ‘regular modelling’ to ‘updates to flood risk modelling’
Page 22, 2.3.11, Table 11. Currently the report states April 2015 as an estimated date for the Lower Thames Mapping to be delivered. Whilst the 1D model has been completed, the more detailed 2D Modelling is still being worked on. We suggest that wording is changed to the estimated date for detailed Lower Thames Mapping as early 2016.
Page 22, 2.3.12 Regarding a Product 4, this relates to the depth and extent of flooding where it has been modelled, but it does not provide velocity and hazard as part of the package.
Page 22 ‘Taking account of climate change’, it is worth noting that updated guidance on how to include climate change into future assessments of flood risk is due to be released in the next few months. This may change the current guidance on the allowance that should be included to account for climate change over the lifetime of a development. The guidance given here is relatively | Agreed. Amendment made. Noted. Amendment made. Agreed. Amendment made. Noted. Reference made to anticipated update. FRAs should take account of climate change using the most up to date data and guidance from the Environment Agency. |
high level, but a possible update to this section may be necessary in the light of any new information.

Page 23, 2.3.16, Insert 'Flood' into sentence so it reads ‘Lower Mole Flood Alleviation Scheme’.

Agreed. Amendment made.

<table>
<thead>
<tr>
<th>Question 8 - Section 2.4: Part 4 of FRA: Avoiding flood risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you support the content of this chapter?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mr Raymond Spary</th>
<th>Weybridge Society</th>
</tr>
</thead>
<tbody>
<tr>
<td>Partly. The following “1. Minor development” needs to be rewritten, it is confusing and could allow incorrect applications to be passed. “extensions with a footprint of 250 sqm or less” totally unacceptable this is far too big suggest even 25 sqm is too large. Below shows how such a high figure will easily result in large numbers of developments ruining the flood capacity.</td>
<td></td>
</tr>
<tr>
<td>Quote Appendix 3 - ‘Developed’ areas within 1 in 20 year flood outline</td>
<td></td>
</tr>
<tr>
<td>Whilst it is acknowledged that full compensation may not be possible on all minor developments, an applicant must be able to demonstrate that every effort has been made to achieve this and provide full justification where this is not the case.</td>
<td></td>
</tr>
</tbody>
</table>

<p>| Noted. The definition of ‘minor development’ in relation to flood risk is set by Government within the National Planning Practice Framework. The final SPD will refer to ‘small scale development’ rather than ‘minor development’, to avoid confusion with the classifications of development for the purposes of planning applications. Section 2.1 of the SPD has been revised to include definitions of development types. |
| Appendix 2 states that small scale development within Flood Zone 3b (1in 20 year flood outline) requires that an FRA considers in detail, the flood risk implications of the development. Proposals should not increase flood risk elsewhere by impeding flow or reducing storage capacity. Whilst flood compensation storage may not be achievable on all sites, it needs to be demonstrated that every effort has been made. With larger extensions to homes and commercial buildings it is unlikely that a proficient FRA will be able to demonstrate that there is no opportunity for flood compensatory storage. |
| Planning applications are assessed on a case by case basis and the onus is on the applicant to demonstrate that ‘every effort has been made’. The Council will assess this information, and take a view to whether, on balance, the site specific FRA in its entirety has sufficiently demonstrated that the proposed development will be made safe; will not increase flood risk elsewhere and where possible will reduced flood |</p>
<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Response</th>
<th>Additional Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr R O'Sullivan</td>
<td>Wey Road and Round Oak Road Residents Association</td>
<td>Partly. Appendix 3: Leaving open the inability to incorporate full flood compensation measures to justification creates unnecessary conflict and argument, and is fraught with the danger of precedent creation. The acknowledgment is far too general in nature, and is open to abuse. Who will determine whether “every effort has been made” to meet this requirement?</td>
<td>Appendix 2 states that small scale development within Flood Zone 3b (1 in 20 year flood outline) requires that an FRA considers in detail, the flood risk implications of the development. Proposals should not increase flood risk elsewhere by impeding flow or reducing storage capacity. Whilst flood compensation storage may not be achievable on all sites, it needs to be demonstrated that every effort has been made. With larger extensions to homes and commercial buildings it is unlikely that a proficient FRA will be able to demonstrate that there is no opportunity for flood compensatory storage. Planning applications are assessed on a case by case basis and the onus is on the applicant to demonstrate that ‘every effort has been made’. The Council will assess this information, and take a view to whether, on balance, the site specific FRA in its entirety has sufficiently demonstrated that the proposed development will be made safe; will not increase flood risk elsewhere and where possible will reduced flood risk overall. If the FRA fails to do so, then planning permission will be refused on flood risk grounds.</td>
</tr>
<tr>
<td>Ms N Nockles</td>
<td>Resident</td>
<td>No. Environmental Agency’s revised maps of flood risk (Rivers and Sea) for the Lower Thames (Hurley to Teddington) will not be published until the Spring of 2016. Until that is issued any consultation on flood risk is irrelevant.</td>
<td>The SPD provides further detail and guidance on the Council’s approach to new development and flood risk. It does not specifically identify the areas of risk within the Borough. However, sign posts to where the most recently published mapping can be found (EA website and the Council’s SFRA). The Council’s SFRA (2015) is a ‘living document’ acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.</td>
</tr>
<tr>
<td>Miss G Pacey</td>
<td>Runnymede Borough</td>
<td>Yes. Table below 2.4.3, second bullet point. States that the sequential test does not need to be applied if one has already been undertaken for development of the type proposed on the site in question. Is there a time limit that this would apply for before a new assessment</td>
<td>Agree that a previous assessment cannot be relied upon indefinitely. In accordance with the NPPF and as part of any forthcoming plan preparations, including potential allocation of sites for development, the Sequential Test will be applied to demonstrate that</td>
</tr>
</tbody>
</table>
would be required (e.g. 1 year, 3 years, 5 years). Surely a previous assessment cannot be relied upon indefinitely?

I think that the explanation of what is meant by reasonably available in para 2.4.7 is helpful.

para 2.4.11: it is stated that applicants will be expected to demonstrate the sustainability benefits of applications by assessing against the SA framework in table 12. Is there a certain number of objectives that have to meet? Or could meeting one of the objectives be sufficient? Clearly not all of the objectives would apply to each type of application. No real guidance is given as to how Elmbridge would assess if part 1 of the test had been passed but I appreciate that this would be difficult to quantify.

there are no reasonably available sites within a lower probability of flooding for the type of development or land use proposed. The evidence base behind the allocations within any forthcoming updated Local Plan, namely the Land Availability Assessment (LAA) which includes land for residential and employment uses. This will be reviewed on an annual basis.

Noted.

In terms of addressing Part 1 of the Exceptions test applicants will be expected to demonstrate the sustainability benefits of their application against the impact created from the development. This will be in conjunction with an assessment against the Council’s Sustainability Appraisal framework. It is not possible to confirm that certain benefits will always outweigh the flood risk and Part 1 of an Exceptions test will be considered on an individual basis taking into account the proposed use/s and the demonstrated need. This will be considered against the Sustainability Appraisal Objectives and the most up to date relevant evidence bases. The Council will seek the advice of statutory stakeholders as required. This been clarified within the text of section 3.3.12 & 3.3.13 which also outlines examples of circumstances which would be very unlikely to be considered to provide sufficient benefits to the community to outweigh the flood risk.

Mr Temple
Brooklands Museum Trust
Yes. The Exception test will be very important for an organisation like Brooklands Museum which is tied to a particular site and cannot therefore contemplate putting proposed developments on other sites which are less vulnerable.

Support noted.

Mr Cooke
Thames Ditton &
No. In general, we feel that, despite the fact that
| Weston Green Residents Association | Thames Ditton and Weston Green are areas very vulnerable to flooding, the Sequential Test is largely irrelevant given that most applications are for small, unique sites where comparisons are very difficult to make. Para 2.4.9

The Exception Test wording gives very little indication to Case Officers as to the weight of considerations — “It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.”

How much weight and to what?

Example – an application would appear to be capable of passing the exception test by virtue of it providing “sufficient housing to enable people to live in a home suitable to their needs and which they can afford.” – This cannot be seen to be in line with the Core Strategy which states that Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely manage

Again, we feel that this is an area open to far too much interpretation potentially leading to a conflict with the Core Strategy and/or greater numbers of appeals. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>In terms of addressing Part 1 of the Exceptions test applicants will be expected to demonstrate the sustainability benefits of their application against the impact created from the development. This will be in conjunction with an assessment against the Council’s Sustainability Appraisal framework. It is not possible to confirm that certain benefits will always outweigh the flood risk and Part 1 of an Exceptions test will be considered on an individual basis taking into account the proposed use /s and the demonstrated need. This will be considered against the Sustainability Appraisal Objectives and the most up to date relevant evidence bases. The Council will seek the advice of statutory stakeholders as required. This been clarified within the text of section 3.3.12 &amp; 3.3.13 which also outlines examples of circumstances which would be very unlikely to be considered to provide sufficient benefits to the community to outweigh the flood risk. All development must comply with the Core Strategy policy. Whilst Part 1 of the Exceptions Test provides an opportunity to demonstrate the wider sustainability benefits of the development that outweigh its location within an area at risk, Part 2 of the test must demonstrate that the development complies with the remaining criteria of the policy CS26.</td>
<td></td>
</tr>
<tr>
<td>Cllr Axton Molesey Residents Association</td>
<td>No. In general, we feel that, despite the fact that East and West Molesey are areas very vulnerable to flooding, the Sequential Test is largely irrelevant given that most applications are for small, unique sites where comparisons are very difficult to make. Para 2.4.9</td>
</tr>
<tr>
<td>Noted</td>
<td></td>
</tr>
</tbody>
</table>
The Exception Test wording gives very little indication to Case Officers as to the weight of considerations – “It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.”

How much weight and to what?

Example – an application would appear to be capable of passing the exception test by virtue of it providing “sufficient housing to enable people to live in a home suitable to their needs and which they can afford”. – This cannot be seen to be in line with the Core Strategy which states that Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely manage

Again, we feel that this is an area open to far too much interpretation potentially leading to a conflict with the Core Strategy and/or greater numbers of appeals.

In terms of addressing Part 1 of the Exceptions test applicants will be expected to demonstrate the sustainability benefits of their application against the impact created from the development. This will be in conjunction with an assessment against the Council’s Sustainability Appraisal framework. It is not possible to confirm that certain benefits will always outweigh the flood risk and Part 1 of an Exceptions test will be considered on an individual basis taking into account the proposed use/s and the demonstrated need. This will be considered against the Sustainability Appraisal Objectives and the most up to date relevant evidence bases. The Council will seek the advice of statutory stakeholders as required. This been clarified within the text of section 3.3.12 & 3.3.13 which also outlines examples of circumstances which would be very unlikely to be considered to provide sufficient benefits to the community to outweigh the flood risk.

All development must comply with the Core Strategy policy. Whilst Part 1 of the Exceptions Test provides an opportunity to demonstrate the wider sustainability benefits of the development that outweigh its location within an area at risk, Part 2 of the test must demonstrate that the development complies with the remaining criteria of the policy CS26.

Jack Moeran Environment Agency

Page 27, 2.4.3, the bullet points within the exemption box need to be re-worded. ‘Sites allocated in the Local Plan’ must be amended to ‘Sites allocated in the Local Plan which have been sequentially tested’.

In addition, we advise a bullet point is added which reads ‘Sites allocated in a Neighbourhood Plan (if adopted as a development plan) which have been sequentially tested’.

Agreed. Amendment made.

Any forthcoming adopted Neighbourhood Plan would form part of the Local Plan.

Question 9 - Section 2.5: Part 5 of FRA: Managing and mitigating flood risk
Do you support the content of this chapter?

Mr Raymond Weybridge Society Partly. Q9 - Floodplain Compensation Storage Noted. The SFRA and the Draft SPD recognises that
<table>
<thead>
<tr>
<th><strong>Mr R O’Sullivan</strong></th>
<th><strong>Wey Road and Round Oak Road Residents Association</strong></th>
<th><strong>Partly. Para 22: Leaving open the inability to incorporate full flood compensation measures to justification creates unnecessary conflict and argument, and is fraught with the danger of precedent creation. The acknowledgment is far too general in nature, and is open to abuse. Who will determine whether the justification is sufficient to meet this requirement? When considered in association with the aforementioned and excessive 250m2 definition of “minor development” there is clear potential for a decrease in flood plain storage capacity</strong></th>
</tr>
</thead>
</table>
| This chapter provides a lot of very useful information but the use of “minor development as 250 sqm.” which is far too large a size for property development especially in Flood Zone 3 (20 year). The quotes below show how the policy will easily fail most of the time:-  

**Quote - 2.5.22**  
It is recognised that full compensation may not always be possible, particularly for minor development schemes and sites wholly within Flood Zone 3. In these cases full justification must be provided and other measures incorporated to help mitigate any loss of floodplain storage e.g. flow routing, flood voids, removal of non-floodable structures.

**Quote - Appendix 3**  
Whilst it is acknowledged that full compensation may not be possible on all minor developments, an applicant must be able to demonstrate that every effort has been made to achieve this and provide full justification where this is not the case. |
| **Proposals should not increase flood risk elsewhere by impeding flow or reducing storage capacity. Whilst flood compensation storage may not be achievable on all sites, it needs to be demonstrated that every effort has been made. With larger extensions to homes and commercial buildings it is unlikely that a proficient FRA will be able to demonstrate that there is no opportunity for flood compensatory storage** |
| **All Planning applications are assessed on their own merits on case by case basis. The onus is on the applicant to demonstrate that ‘every effort has been made’ Planning applications are assessed on case by case basis and the onus is on the applicant to demonstrate that ‘every effort has been made’. The Council will assess this information, and take a view to whether, on balance, the site specific FRA in its entirety has sufficiently demonstrated that the proposed development will be made safe; will not increase flood risk elsewhere and where possible will reduced flood risk overall. If the FRA fails to do so, then planning permission will be refused on flood risk grounds.** |
Seek to increase the requirement for any development (as redefined to include re-development) to incorporate measures to:

a) prevent the impedance of flood water from affecting nearby properties, and

b) compensate for the loss of floodplain storage for any part of any such development which, of necessity, has to be set at ground level e.g. garages.

made’. The Council will assess this information, and take a view to whether, on balance, the site specific FRA in its entirety has sufficiently demonstrated that the proposed development will be made safe; will not increase flood risk elsewhere and where possible will reduced flood risk overall. If the FRA fails to do so, then planning permission will be refused on flood risk grounds.

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ms N Nockles</td>
<td>Resident</td>
<td>No. Environmental Agency’s revised maps of flood risk (Rivers and Sea) for the Lower Thames (Hurley to Teddington) will not be published until the Spring of 2016. Until that is issued any consultation on flood risk is irrelevant and a waste of taxpayer’s money. Reference page 22 of Draft Flood Risk SPD, table 11, October 2015.</td>
</tr>
<tr>
<td>Miss G Pacey</td>
<td>Runnymede Borough</td>
<td>Yes. Lots of helpful guidance for applicants. In para 2.5.17 it talks about low flood risk being acceptable in some instances for safe access and egress but a definition of what will be taken as low is not provided. Can it be assumed that this would only be parts of the route with a flood hazard of less than 0.75 (or caution) as anything above this would endanger people to some degree. If so should it refer to very low risk in the last two bullet points of para 2.5.17 instead of low?</td>
</tr>
<tr>
<td>Mr Temple</td>
<td>Brooklands Museum Trust</td>
<td>Partly. Given the scarcity of land for potential compensation in the Brooklands area, and the typically high ground water levels which could render several of these mitigation methods irrelevant, the importance of flood voids and sympathetic consideration of other factors is greatly increased.</td>
</tr>
<tr>
<td>Mr Cooke</td>
<td>Thames Ditton &amp; Weston Green</td>
<td>Partly. Our concern here mainly lies with the ability, or otherwise, of Case Officers, frequently with very limited</td>
</tr>
</tbody>
</table>

The SPD provides further detail and guidance on the Council’s approach to new development and flood risk. It does not specifically identify the area of risk within the Borough. However, sign posts to where the most recently published mapping can be found (EA website and the Council’s SFRA).

The Council’s SFRA (2015) is a ‘living document’ acknowledging that the Environment Agency reviews and updates the Flood Map for Planning

Noted. It is acknowledged that not every method will be appropriate on each site and that an individual approach within each FRA will be required.

Noted. An FRA should be undertaken by a suitably qualified person e.g. drainage engineer (recognised
<p>| Residents Association | local knowledge, to properly assess what mitigation measures might be acceptable and effective. This is clearly a very specialist area and we would urge the Council to provide a resource. In particular, where most applications will not be subject to referral to the Environment Agency, it is essential that someone with a sound understanding of this subject is available. In fact, this concern also covers other aspects of the Plan. Given that the Council recognises the need to provide a specialist resource in respect of Conservation Areas, it is surely right to expect it to provide resource in respect of flood risks given the importance of this subject to the Borough in general. | by the Engineering Council, the Institute of Civil Engineers or equivalent). This is particularly important in cases where the risk of flooding is high. The Council’s internal knowledge of flooding and flood risk is increasing to deal with the majority schemes. Officers have been in discussions with other local authorities to see whether resources from drainage engineers could be sought on more detailed schemes. |
| Cllr Axton Molesey Residents Association | Partly. Our concern here mainly lies with the ability, or otherwise, of Case Officers, frequently with very limited local knowledge, to properly assess what mitigation measures might be acceptable and effective. This is clearly a very specialist area and we would urge the Council to provide a resource. In particular, where most applications will not be subject to referral to the Environment Agency, it is essential that someone with a sound understanding of this subject is available. In fact, this concern also covers other aspects of the Plan. Given that the Council recognises the need to provide a specialist resource in respect of Conservation Areas, it is surely right to expect it to provide resource in respect of flood risks given the importance of this subject to the Borough in general. | Noted. An FRA should be undertaken by a suitably qualified person e.g. drainage engineer (recognised by the Engineering Council, the Institute of Civil Engineers or equivalent). This is particularly important in cases where the risk of flooding is high. The Council’s internal knowledge of flooding and flood risk is increasing to deal with the majority schemes. Officers have been in discussions with other local authorities to see whether resources from drainage engineers could be sought on more detailed schemes. |
| Sue Janota Surrey County Council | 2.5.8: Page reference – should it be 24 not 15? This section could indicate that the County Council is a statutory consultee on surface water management drainage issues for all new major developments and should refer to the relevant documents on the County | Agreed. Amendment made. |
| | | Agreed. Amendment made. |</p>
<table>
<thead>
<tr>
<th>Jack Moeran</th>
<th>Environment Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Council’s website</strong> (<a href="http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice">http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice</a>)</td>
<td><strong>Page 38, ‘Floodplain Compensation Storage’.</strong> The opening text in the box states that proposal in developed areas within Flood Zone 3a, but excluding minor development, should not result in a net loss of flood storage capacity. When considering minor development, would this include householder extensions? If so, as some of the extensions to properties in Elmbridge are large, would this contribute to a cumulative loss of floodplain storage capacity? The policy on floodplain compensation storage is pretty comprehensive, but it would be helpful to clarify just what ‘minor’ development is considered to be in this instance. <strong>Page 40, 2.5.25</strong> When considering minimum length of voids, could ‘1m’ be changed for ‘1 metre’ please.</td>
</tr>
<tr>
<td><strong>Appendix 2 states that small scale development within Flood Zone 3b (1in 20 year flood outline) requires that an FRA considers in detail, the flood risk implications of the development. Proposals should not increase flood risk elsewhere by impeding flow or reducing storage capacity. Whilst flood compensation storage may not be achievable on all sites, it needs to be demonstrated that every effort has been made. With larger extensions to homes and commercial buildings it is unlikely that a proficient FRA will be able to demonstrate that there is no opportunity for flood compensatory storage</strong></td>
<td><strong>Noted.</strong></td>
</tr>
</tbody>
</table>