



Elmbridge
Borough Council
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Elmbridge Local Plan

Draft Flood Risk Supplementary Planning Document

Consultation Statement (Regulation 12)

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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 with 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 recommended 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 in 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 emphasis 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 (1in 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
Curchod & 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 Billinghamurst
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
Rapeleys 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
Wolf 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
David Archer
Dorothy Mitchell
Elise Dunweber
Tannia Shipley
Glenn P Dearlove
Ian Donaldson
Ivan Regan
James Browne
James Vickers
Jan Fuller
Janet Turner
John Butcher
John O'Reilly
John Sheldon
Karen Randolph
Kim Cross
Lewis Brown
Liz Robertson
Lorraine Samuels
Manwinder Toor
Mary Marshall
Mary Sheldon
Mike Bennison
Mike Axton
Neil Luxton
Nigel Cooper
Nigel Haig-Brown
Peter Santo
Rachael Lake
Ramon Gray
Richard Knight
Roy Green
Ruby Ahmed
Ruth Bruce
Ruth Lyon
Ruth Mitchell
Shweta Kapadia
Simon Foale
Simon Waugh
Steve Bax
Stuart Hawkins
Stuart Selleck
Tim Grey
Tim Oliver
Tricia Bland
Victor Eldridge

Other – Politics

Bracknell Forest Borough Council
Buckinghamshire County Council
Cobham Garden and Horticultural
Association and Esher & Walton
Constituency Labour Party
Cobham, Downside, Oxshott & Stoke
D'Abernon Labour Party
Ealing Borough Council
Elmbridge Borough Council - Pollution
Team
Epsom and Ewell Borough Council
East Molesey Conservatives
Esher & Walton Conservative
Association
EWCA
London Borough of Barnet
Hampshire County Council
Harrow Council
Hart District Council
Hillingdon Council
London Borough of Brent
London Borough of Croydon
London Borough of Hounslow
London Borough of Merton
London Borough of Sutton
Reigate & Banstead Borough Council
Royal Borough of Windsor and
Maidenhead
Rushmoor Borough Council
Slough Borough Council
South Bucks District Council
Surrey Heath Borough Council
Tandridge District Council
Waverley Borough Council
Wokingham Borough Council
Wycombe District Council
Weybridge Liberal Democrats

Sport

Claygate Martial Arts Centre
Department for Culture Media and
Sport
Metropolitan Police (Imber Court)
Sports Club
Sport England

Utilities

BPA (British Pipeline Association)

Tourism

Brooklands Museum Trust Ltd

Transport

First County Group

Youth

1st Hinchley Wood Scouts

Claygate Village Youth Club
Association

Sunbury and Walton Sea Cadets

Appendix 2: Consultation E-mail Invite

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 <i>... bridging the communities ...</i>	Civic Centre High Street, Esher Surrey KT10 9SD Switchboard: 01372 474474 DX: 36302 Esher Website: www.elmbridge.gov.uk
--	--

Sir /Madam Wates Homes Wates House Station Approach Leatherhead KT22 7SW	<i>contact:</i> Planning Policy <i>telephone:</i> 01372 474474 <i>fax:</i> 01372 474910 <i>e-mail:</i> planningpolicy@elmbridge.gov.uk <i>my ref:</i> FSPD/2015 <i>your ref:</i> <i>date:</i> 12 October 2015
---	--

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 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.

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.ti/FloodRiskSPD/consultationHome>




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 – surreyoc.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.ti/FloodRiskSPD/consultationHome>
- Email to planningpolicy@elmbridge.gov.uk



No. PS 50571
Borough Council

Strategic Director
Ray Lee

Strategic Director and Deputy Chief Executive: Sarah Selvanathan Chief Executive: Robert Moran

- 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.ti/FloodRiskSPD/consultationHome> 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)



Representation Form for the Draft Flood Risk Supplementary Planning Document

Draft Flood Risk Supplementary Plan Document (SPD) Representation Form

Ref: _____
(For official use only)

Please return to Elmbridge Borough Council by 4pm on 9 November 2015

This form has three parts –
Part A – Personal Details
Part B – Comments/Representations on the Draft Flood Risk SPD

Part A – Personal Details

Personal Details* _____ Agent's Details (if applicable) _____

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title _____
First Name _____
Last Name _____
Job Title (where relevant) _____
Organisation (where relevant) _____
Address Line 1 _____
Line 2 _____
Line 3 _____

Produced by Planning Services – October 2015 Page 1 of 6

Line 4 _____
Post Code _____
Telephone Number _____
E-mail Address (where relevant) _____

Produced by Planning Services – October 2015 Page 2 of 6

Part B – Draft Flood Risk SPD

Please indicate whether or not you agree with the content of each chapter of the Draft SPD. Where you wish to comment further please do so in the relevant box below. Please refer to paragraph numbers where appropriate.

1. Notification of adoption
Do you wish to be notified of the adoption of the Flood Risk SPD
Yes No

2. How to Use this Supplementary Planning Document
Do you support the content of this chapter Yes No Partly
Comments _____
(Continue on a separate sheet /expand box if necessary)

3. Section 1.1: Introduction
Do you support the content of this chapter Yes No Partly
Comments _____
(Continue on a separate sheet /expand box if necessary)

Produced by Planning Services – October 2015 Page 3 of 6

4. Section 1.2: Policy framework and guidance
Do you support the content of this chapter Yes No Partly
Comments _____
(Continue on a separate sheet /expand box if necessary)

5. Section 2.1: Flood Risk and the planning process
Do you support the content of this chapter Yes No Partly
Comments _____
(Continue on a separate sheet /expand box if necessary)

6. Section 2.2: Parts 1 & 2 of FRA: Site information and proposed development
Do you support the content of this chapter Yes No Partly
Comments _____
(Continue on a separate sheet /expand box if necessary)

Produced by Planning Services – October 2015 Page 4 of 6

7. Section 2.3: Part 3 of FRA: Assessing flood risk

Do you support the content of this chapter Yes No Partly

Comments

(Continue on a separate sheet /expand box if necessary)

8. Section 2.4: Part 4 of FRA: Avoiding flood risk

Do you support the content of this chapter Yes No Partly

Comments

(Continue on a separate sheet /expand box if necessary)

9. Section 2.5: Part 5 of FRA: Managing and mitigating flood risk

Do you support the content of this chapter Yes No Partly

Comments

(Continue on a separate sheet /expand box if necessary)

Signature:

Date:

Planning Services
Elmbridge Borough Council
Civic Centre
High Street
Esher
KT10 8SD
01372 474474
planningpolicy@elmbridge.gov.uk
www.elmbridge.gov.uk/planning

Appendix 5: Consultation Homepage

Elmbridge Borough Council Consultations - Draft Flood Risk Supplementary Planning Document - Co - Windows Internet Explorer


http://consult.elmbridge.gov.uk/consult.t/FloodRiskSPD/consultat

Bridge-it - Homepage


Elmbridge Borough Council C...

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...bridging the communities...



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Environment

Health & Social Care

Housing

Leisure & Culture

Planning Services

Recycling & Waste

Transport & Streets

Home > Planning > Planning Policy > Draft Flood Risk Supplementary Planning Document

Draft Flood Risk Supplementary Planning Document

Ends: 09 Nov 2015

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 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 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.

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 you can get involved?

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




Elmbridge Borough Council Consultations - Draft Flood Risk Supplementary Planning Document - Co - Windows Internet Explorer

http://consult.elmbridge.gov.uk/consult.t/FloodRiskSPD/consultat


Bridge-it - Homepage

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Elmbridge Building Control Services



Socitm Better connected
2015
measuring quality in council websites



Toddler Time in The Wild



Literary Competition
2015
Flights of Fantasy

Alternatively, hard copies are available at:

- ▶ Elmbridge Borough Council, Civic Centre, High Street, Esher, KT10 9SD
- ▶ 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 you can 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@elmbridge.gov.uk
- ▶ Post to Elmbridge Borough Council, Planning Policy, Civic Centre, Esher, KT10 9SD

When submitting comments/representations via email 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 not hesitate to contact the Planning Policy Team on 01372 474474 or planningpolicy@elmbridge.gov.uk

You may now respond to this consultation

Consultation Documents

<http://www.elmbridge.gov.uk/leisure/arts/Litcomp.htm>

Elmbridge Borough Council Consultations - Draft Flood Risk Supplementary Planning Document - Co - Windows Internet Explorer

http://consult.elmbridge.gov.uk/consult.t/FloodRiskSPD/consultat

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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, 406 KB
- Statement of Representations Procedure
06 Oct 2015 11:30, 227 KB
- SEA/HRA Determination Statement
09 Oct 2015 08:55, 273 KB
- Strategic Flood Risk Assessment - Main Report including Appendix A, E and F
06 Oct 2015 13:26, 8.0 MB
- SFRA Appendix B, Figures B1-B4
06 Oct 2015 13:27, 1.8 MB
- SFRA Appendix B, Figures B5-B9
06 Oct 2015 13:28, 2.0 MB
- SFRA Appendix C, Figures C1-C6
06 Oct 2015 13:28, 4.1 MB
- SFRA Appendix C Figures C7-C13
06 Oct 2015 13:28, 4.6 MB
- SFRA Appendix D, Figures D1-D6
06 Oct 2015 13:28, 4.3 MB
- SFRA Appendix D, Figures D7-D13
06 Oct 2015 13:28, 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

Elmbridge Borough Council Consultations - Draft Flood Risk Supplementary Planning Document - Co - Windows Internet Explorer

http://consult.elmbridge.gov.uk/consult.t/FloodRiskSPD/consultat

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- SFRA Appendix D, Figures D7-D13
06 Oct 2015 13:28, 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
- ▶ Respond by uploading a response document
- ▶ Respond by post

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

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Appendix 6: Elmbridge Borough Council Homepage and Planning Policy Update webpage

Elmbridge Borough Council - Home - Windows Internet Explorer

http://www.elmbridge.gov.uk/

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Latest News

- Tree felling and thinning works set to improve road safety and biodiversity (12/10/2015)
- Rugby World Cup 2015 Italian Squad cuts a 'bella figura' at Civic Reception (09/10/2015)
- Business Continuity - Planning for a Secure Future (09/10/2015)
- Over 11,000 people flock to the Elmbridge Food Festival (30/09/2015)
- Helping hands at the Thames Ditton Centre (25/09/2015)

More news...

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Latest Events

- Healthy Walk : 15 minutes short, very slow walk, then 30 minutes slow 16/10/2015 (16/10/2015)
- Healthy Walk : Pump Pond Wood (16/10/2015)
- Healthy Cycle Ride : Sunbury Walled Garden and Walton Bridge (16/10/2015)
- Healthy Walks : To Black Pond (17/10/2015)
- Rotary Club of Surbiton Charity Car Boot Sale (18/10/2015)

More events...

Submit Your Event

Subscribe to our RSS events feed

Subscribe to the Surrey Wide RSS events feed

Added 09 October 2015

- Specialist Day Care Assistant Added 08 October 2015
- Casual Relief Care Sitter Added 08 October 2015

Subscribe to the jobs RSS feed

Register at Surreyjobs to receive jobs by email

Let's talk Elmbridge

We value your opinion and feedback:

Consultation on Draft Flood Risk Supplementary Planning Document

Deadline: 9 Nov. 2015 at 4pm.

A pilot webcasting programme is available to view Council, Cabinet and certain Planning meetings. Our Democratic Services Team would like your views.

Join the residents panel

We need your views

- How to get involved
- Our current consultations
- Complaints, compliments or suggestions

Subscribe to RSS Consultation Diary

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http://www.elmbridge-public-tv/core/portal/home

Progress Update - Windows Internet Explorer

http://www.elmbridge.gov.uk/planning/policy/progressupdate.htm

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- Land Charges
- Planning FAQs
- Planning On Line
- Planning Policy
- Street Naming

Home > Planning > Planning Policy > Progress Update

Planning Policy update - October 2015

For an overview of the timetable and documents in preparation please see the Local Development Scheme.

Local Plan - plan making


- The draft Flood Risk Supplementary Planning Document (SPD) has now been published for consultation. This will assist applicants in preparing Flood Risk Assessments to accompany planning applications. Please let us know your comments by 4pm on Monday 9 November 2015.
- The Development Management Plan was adopted on 15 April 2015. It sets out detailed policies for the day-to-day management of development.
- The Statement of Community Involvement (SCI) sets out how we engage with the local community and key stakeholders on the preparation of Local Plans and in the determination of planning applications. The SCI was adopted on the 29 June 2015.

Local Plan - evidence base

- We are currently looking into the **housing market area** in which Elmbridge is located. Once this has been determined a study examining the level of housing need across the area will be commissioned.
- The Council has commissioned ARUP to undertake a **Green Belt Boundary Review** for the Borough. The review will assess land within the Green Belt and whether it still meets the purposes of the designation.
- Our Duty to Cooperate Scoping Statement was published in January 2015. Its main purpose is to set out how Elmbridge will cooperate with neighbouring local planning authorities and other prescribed bodies to ensure that cross-boundary and strategic planning matters are addressed effectively in the Local Plan.

FEEDBACK

Appendix 7: Newspaper Advert



Elmbridge Borough Council
... bringing the communities ...

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

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Technology

Transport

Utilities

Various Other

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Healthcare

Legal

Real Estate


Technology

Transport

Utilities

Various Other

Appendix 8: Poster for all Borough Noticeboards



Elmbridge
Borough Council
... bridging the communities ...

**Consultation on the Draft
Flood Risk
Supplementary Planning
Document (SPD)**

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

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

Produced by: Planning Services October 2015

Appendix 9: Tweets

Tweets Follow


... victim, or any other person, believes to be motivate by prejudice or hate
[#NHCAW](#) [#Westandtogether](#)

 **Elmbridge BC** @ElmbridgeBC 12 Oct

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

Expand

Expand

 **Elmbridge BC** @ElmbridgeBC 19h

Interested in development and flood risk? Take a look at the draft Flood Risk SPD and let us know your thoughts at bit.ly/1EKp6Lb


Expand

Tweets Follow

 **Elmbridge BC** @ElmbridgeBC 14h

Last chance to have your say on the draft Flood Risk SPD at bit.ly/1EKp6Lb - deadline 4pm on 9 November 2015

Expand

 **Elmbridge BC** @ElmbridgeBC 2 Nov

Last chance to have your say on the draft Flood Risk SPD at bit.ly/1EKp6Lb - deadline 4pm on 9 November 2015

Expand

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 (LDD) policies. The National Planning Framework (NPPF) 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 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.

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 09 November 2015.

The Planning Service maintains a database of statutory (specific consultation bodies 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/ti/FloodRiskSPD/consultationHome>

Copies of the Documents

The SPD and supporting documents can be viewed online:

- Online consultation portal – <http://consult.elmbridge.gov.uk/consult/ti/FloodRiskSPD/consultationHome>

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 – www.surreycc.gov.uk or call 0300 200 1001 for locations and opening hours

Representations

All comments/representations must be submitted by 4pm on 09 November 2015 and can be submitted via:

- Online consultation portal – <http://consult.elmbridge.gov.uk/consult/ti/FloodRiskSPD/consultationHome>
- Email to planningpolicy@elmbridge.gov.uk
- Post to Planning Policy, 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/ti/FloodRiskSPD/consultationHome> 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 planningpolicy@elmbridge.gov.uk, or telephone 01372 474474

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 appendix1.

Respondent Name	Organisation/ Resident Population	Response	Council's Response
General Comments or no comments to make on Draft Flood Risk SPD			
Alan Byrne	Historic England	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.	Noted
Amanda Purdye	Civil Aviation Authority	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.	Noted
Andrew Hiley	Transport for London	Thank you for consulting TfL Borough Planning. I have no comments on the draft SPD.	Noted
Hannah Cook	Spelthorne Borough Council	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.	Noted
James McCabe	Wokingham Borough Council	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.	Noted
John Cheston	Mid Sussex District Council	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.	Noted
Mike Waite	Surrey Wildlife Trust	We have viewed the document and find it generally helpful. We particularly welcome the inclusion/detail of	Noted

		Para. 2.5.29-31 (Riverside Development).	
Gillian Fensome	Natural England	<p>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.</p> <p>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.</p>	Noted
Simon Vince	Heathrow Airport Limited	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Noted</p> <p>Noted. Not considered relevant to the remit of the SPD.</p> <p>Noted. Not considered relevant to the remit of the SPD.</p> <p>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</p>

		<p>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.</p>	<p>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> <p>Inserted additional paragraph within section 2.5</p>
Peter Almond	Resident	<p>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.</p> <p>There is no high probability of flooding at my property or for most of my neighbours.</p> <p>The flood records for the last flood in 1968 are conflicting and imprecise.</p> <p>Flood defences have been put in place since the last flood and thus the risk is reduced.</p> <p>The current flood risk maps are wrong.</p> <p>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.</p> <p>Insurance companies should be told there is no flood risk in the area and should not be able to refuse to insure areas.</p> <p>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.</p>	<p>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).</p> <p>The Council's SFRA (2015) is a 'living document' acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.</p> <p>This is currently undertaken on a quarterly basis and a rolling programme of detailed flood risk mapping is underway.</p> <p>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 improve the current knowledge of flood risk within the Borough, and may marginally alter predicted flood extents in the future.</p> <p>The Environment Agency advises that if you believe that a particular location is not at risk of flooding, or if you have information that you believe may not have been taken into account, then contact should be made with the local Environment Agency office, which will consider your comments and will advise on the appropriate procedure.</p>
Chris Colloff	Thames Water Property Services	<p>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</p>	<p>Noted. Amendment made</p>

		reported flooding occurring for operational and hydraulic reasons. The definition should therefore be revised to make this clear.	
Ian Donaldson	Molesey Resident's Association	Supports the views of Cllr Mike Axton and Mr Gerald McAully. Please see their responses for details.	Noted
Sue Janota	Surrey County Council	<p>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.</p> <p>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."</p> <p>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.</p> <p>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: http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice</p> <p>Page 54: Need to clarify that the BGS licence is ok on SFRA appendix maps.</p>	<p>Agreed. Amendment made</p> <p>Agreed. Amendment made</p> <p>Noted</p> <p>Noted. Links reviewed and updated</p> <p>Noted.</p>

Tony Howe	Surrey County Council	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.	Noted.
Jack Moeran	Environment Agency	<p>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.</p> <p>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.</p> <p>Provision of a FRA pro-forma offers a way for applicants to approach the FRA process in a methodical and informed manner</p>	<p>Support noted</p> <p>Noted</p> <p>Noted</p>
Question 2 – How to Use this Supplementary Planning Document			
Do you support the content of this chapter?			
Paul Killick	Weyside Marine Services	Yes	Support noted
Revd Johnson	All Saints Weston Green Church	Yes	Support noted
Ray Spary	The Weybridge Society	<p>Partly- It should be clear that by using the single word "development" it means all of the following:-</p> <ul style="list-style-type: none"> 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).

		Please note that the word "development" is not defined in the Glossary.	
M R Sullivan	Wey Road and Round Oak Road Residents Association	<p>Partly- The term "development" 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.”</p> <p>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.</p> <p>Definition of ‘minor development’ should be reduced to 25m2 or 5% increase in footprint in zones 2 & 3</p> <p>Footnote 8- curtilage to be changed to footprint</p> <p>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.</p> <p>Appendix 3, paragraph 4-Deletion of double negative ‘not impeding flows’</p> <p>As it stands, the policy leaves open to argument whether or not sufficient effort has been made to</p>	<p>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).</p> <p>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.</p> <p>Noted. It considered that this is implied within the text, however the proposed measures will be considered on a site by site basis.</p> <p>Agree. Amendment made</p> <p>Noted. The onus is on the applicant to demonstrate</p>

		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 25m ² , 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.
Cllr Axton	Molesey Residents Association	Yes	Support noted
Jack Moeran	Environment Agency	<p>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.</p> <p>Repetition of River Wey in 'what are the types of flood risk in Elmbridge' paragraph.</p> <p>Useful to include Annual Exceedance probability (AEP) event within the descriptions of the Flood Zones.</p> <p>Change 'an' for 'a' in front of FRA in 'What are the implications of flood risk for developers paragraph'.</p>	<p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p>

Respondent Name	Organisation/ Resident	Response	Council's Response
Question 3 - Section 1.1: Introduction			
Do you support the content of this chapter?			
Mr Raymond Spary	Weybridge Society	Yes. No Comment.	Support noted
Mr R O'Sullivan	Wey Road and Round Oak Road Residents Association	Yes. None	Support noted
Ms N Nockles	Resident	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	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

		<p>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</p> <p>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?</p> <p>And</p> <p>As the Environment Agency states, "Local Planning Authorities (LPAs) prepare SFRA's (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?</p> <p>ref Environment Agency TE2100 Plan</p>	<p>within the Borough. However, sign posts to where the most recently published mapping can be found (EA website and the Council's SFRA).</p> <p>The Council's SFRA (2015) is a 'living document' acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.</p> <p>This is currently undertaken on a quarterly basis and a rolling programme of detailed flood risk mapping is underway.</p> <p>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.</p>
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
<p>Question 4 - Section 1.2: Policy framework and guidance Do you support the content of this chapter?</p>			
Mr Raymond Spary	Weybridge Society	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.	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 that have been brought to the Council's attention.

		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.
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 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.

Question 5 - Section 2.1: Flood risk and the planning process
Do you support the content of this chapter?

Mr Raymond Spary	Weybridge Society	<p>Partly. Table 7 needs to be revised as it is very confusing and indicates possible developments that will cause flooding elsewhere.</p> <p>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 "(excluding minor development)" 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.</p>	<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.</p>
Mr R O'Sullivan	Wey Road and Round Oak Road Residents Association	<p>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.</p> <p>Partly. A) 2.1.2 (Note 3 - Definition of "Minor Development"): The term "curtilage" used in the final sentence should be amended to "footprint". 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.</p> <p>Development and re-development should be treated in exactly the same manner as each other in the planning and inspection processes.</p>	<p>Noted. 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.</p> <p>The definition does include the erection of outbuildings within the curtilage of dwelling which would be uses of 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.</p> <p>Noted. The distinction needs to be made to prevent the unnecessary 'blighting' of existing developed areas within the 1 in 20 year flood outline.</p>

		<p>Need to recognise the cumulative effect of minor development.</p> <p>Seek to treat any application which includes any structure below existing ground level as inappropriate.</p> <p>B) .2.1.8 (Appendix 3, para 2, point 9): As it stands, the point suggests that the incorporation of flood resistance/resilience measures designed only for the protection of property and residents will be accepted in isolation as total flood mitigation. Such measures will not mitigate communal flood risk which is the overarching intention of the SPD.</p> <p>Seek the removal of any further Permitted Development Rights from all properties within Flood Zones 2 and 3, including the temporary increases set to expire on 31 May 2019 permitted under the Town and Country Planning (General Permitted Development) (England) Order 2015.</p>	<p>The SPD and the SFRA recognise the potential for both small scale and permitted development to be considered to lead to a cumulative impact on localised flood risk. Based on the recommendations of the SFRA, Appendix 2 of the SPD sets out the Council's localised approach to all applications, including small scale development within Flood Zone 3b (Developed Land).</p> <p>Revised Table 8 provides guidance on when basements would be considered inappropriate. This would apply for all structure below existing ground level.</p> <p>Noted. Appendix 3 (now 2 in the amended SPD) advises that it is likely that a combination of on and off site measures will be required.</p> <p>Noted. As advised in Appendix 3 (now 2 in the amended SPD) of the SPD, the Council will consider the imposition of an Article 4 in the future to remove permitted development rights to ensure that flood risk can be fully assessed in Flood Zone 3b.</p>
Ms N Nockles	Resident	<p>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.</p>	<p>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).</p> <p>The Council's SFRA (2015) is a 'living document' acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.</p>
Miss G Pacey	Runnymede Borough	<p>Yes. Table 7 lists the types of development that are appropriate in different flood zones. Para 2.1.8 'encourages' applicants to proceed with applications for such uses with an FRA. However table 7 lists types of development that are not by definition 'appropriate' and also lists types of development that are only acceptable</p>	<p>The content of Table 'Development type and appropriate uses' (Table 8 in the amended SPD) is based on the national guidance. Officers have reviewed the contents of the table and provided further clarification where possible.</p>

		<p>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.</p> <p>Table 8 is helpful.</p>	<p>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).</p> <p>Noted.</p>
Mr Temple	Brooklands Museum Trust	<p>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)</p>	<p>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.</p>
Mr Cooke	Thames Ditton & Weston Green Residents Association	<p>No. Re para 2.1.8</p> <p>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.</p> <p>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.</p> <p>Our greatest concern is over the wording in the section</p>	<p>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.</p> <p>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.</p> <p>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</p>

		<p>'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.</p> <p>Re para 2.1.19</p> <p>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.</p>	<p>will be an element of interpretation.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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>
Cllr Axton	Molesey Residents Association	<p>Re para 2.1.8</p> <p>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</p>	<p>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.</p> <p>This is especially important for small- scale developments in areas at risk from flooding from rivers</p>

		<p>increased costs to the Council.</p> <p>In particular, the expression – ‘<i>Regard will be had to whether the site is also affected by groundwater flooding</i>’ - 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.</p> <p>Our greatest concern is over the wording in the section ‘<i>Flood Zone 3a (High Probability)</i>’. The wording here seems to suggest that residential development is likely to get the green light by use of the wording - <i>More Vulnerable development can be considered</i> - 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 - <i>More Vulnerable development might be considered in very exceptional circumstances</i> – or something along these lines.</p> <p>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</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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>
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Chris Colloff	Thames Water Property	<p>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.</p> <p>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.</p>	<p>Noted</p> <p>Noted</p>
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	<p>Page 12, 2.1.8, Table .7- Repeat use of word 'not' in FZ3b description</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p>

Question 6 - Section 2.2: Parts 1 & 2 of FRA: Site information and proposed development			
Do you support the content of this chapter?			
Mr Raymond Spary	Weybridge Society	<p>Partly. 2.2.2 Need to add height as being one of the most important data requirements.</p> <p>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.</p>	<p>Assume this refers to ground level, rather than height. Agreed amendment made.</p> <p>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.</p> <p>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.</p>
Mr R O'Sullivan	Wey Road and Round Oak Road Residents Association	<p>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.</p> <p>There seems to be no requirement to take existing ground levels into consideration.</p>	<p>The remit of the SPD is to assist applicantst 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.</p> <p>Agreed amendment (3.1.2 Site Information).</p>
Ms N Nockles	Resident	<p>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.</p>	<p>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).</p> <p>The Council's SFRA (2015) is a 'living document'</p>

			acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.
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

Question 7 - Section 2.3: Part 3 of FRA: Assessing flood risk
Do you support the content of this chapter?

Mr Raymond Spary	Weybridge Society	Partly. Para. 2.3.10 indicates that any areas that have previously had development without proper flood mitigation can be continued to be developed on a case by case basis. All development should be required to decrease the flood risk to the property and the area.	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.
Mr R O'Sullivan	Wey Road and Round Oak Road Residents Association	Partly. Para 10 seems to suggest that past development with little/no incorporation of flood mitigation measures may follow the same criteria. All development should be required not to increase the flood risk to either property or community.	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.
Ms N Nockles	Resident	No. 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

		Teddington) will not be published until the Spring of 2016. Until that is issued any consultation on flood risk is irrelevant.	<p>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).</p> <p>The Council's SFRA (2015) is a 'living document' acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.</p>
Miss G Pacey	Runnymede Borough	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.	<p>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.</p> <p>It should be noted that due to the active management and regular maintenance of these structure, there is a very low risk of the reservoirs failing.</p>
Mr Temple	Brooklands Museum Trust	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.
Mr Cooke	Thames Ditton & Weston Green Residents Association	<p>Partly. Re para 2.3.11</p> <p><i>The Environment Agency is currently undertaking a modelling study for the River Rythe</i></p> <p>We would like to see some target date for completion of this work</p>	Refer to the Environment Agency
Cllr Axton	Molesey Residents Association	<p>Partly. Re para 2.3.11</p> <p><i>The Environment Agency is currently undertaking a modelling study for the River Rythe</i></p> <p>We would like to see some target date for completion of this work</p>	Refer to the Environment Agency

Chris Colloff	Thames Water Property Services Ltd	<p>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.</p> <p>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.</p>	<p>Noted</p> <p>Noted</p>
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	<p>Page 20, 2.3.8, Please change 'regular modelling' to 'updates to flood risk modelling'</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Agreed. Amendment made.</p> <p>Noted. Amendment made.</p> <p>Agreed. Amendment made.</p> <p>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.</p>

		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.

Question 8 - Section 2.4: Part 4 of FRA: Avoiding flood risk
Do you support the content of this chapter?

Mr Raymond Spary	Weybridge Society	<p>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.</p> <p>Quote Appendix 3 - 'Developed' areas within 1 in 20 year flood outline</p> <p>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.</p>	<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.</p> <p>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.</p> <p>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>
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			risk overall. If the FRA fails to do so, then planning permission will be refused on flood risk grounds.
Mr R O'Sullivan	Wey Road and Round Oak Road Residents Association	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?	<p>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.</p> <p>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.</p>
Ms N Nockles	Resident	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.	<p>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).</p> <p>The Council's SFRA (2015) is a 'living document' acknowledging that the Environment Agency reviews and updates the Flood Map for Planning.</p>
Miss G Pacey	Runnymede Borough	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	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

		<p>would be required (e.g. 1 year, 3 years, 5 years). Surely a previous assessment cannot be relied upon indefinitely?</p> <p>I think that the explanation of what is meant by reasonably available in para 2.4.7 is helpful.</p> <p>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.</p>	<p>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.</p> <p>Noted.</p> <p>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.</p>
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	Noted.

	Weston Green Residents Association	<p>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.</p> <p>Para 2.4.9</p> <p>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'.</p> <p>How much weight and to what?</p> <p>Example – an application would appear to be capable of passing the exception test by virtue of it providing <i>'sufficient housing to enable people to live in a home suitable to their needs and which they can afford'</i>. – <i>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</i></p> <p>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.</p>	<p>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.</p> <p>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.</p>
Cllr Axton	Molesey Residents Association	<p>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.</p> <p>Para 2.4.9</p>	Noted

		<p>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'.</p> <p>How much weight and to what?</p> <p>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'. – <i>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</i></p> <p>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.</p>	<p>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.</p> <p>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.</p>
Jack Moeran	Environment Agency	<p>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'.</p> <p>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'.</p>	<p>Agreed. Amendment made.</p> <p>Any forthcoming adopted Neighbourhood Plan would form part of the Local Plan.</p>
<p>Question 9 - Section 2.5: Part 5 of FRA: Managing and mitigating flood risk Do you support the content of this chapter?</p>			
Mr Raymond	Weybridge Society	Partly. Q9 - Floodplain Compensation Storage	Noted. The SFRA and the Draft SPD recognises that

Spary		<p>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:-</p> <p>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.</p> <p>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.</p>	<p>there is potential for both 'small -scale' development as well as permitted development to be considered to lead to a cumulative impact on the localised flood risk, as a result of impact on local storage capacity and flood flows. Based on the findings and recommendations of the SFRA Appendix 2 of the SPD sets out the Council's localised approach to all applications, including small scale development within Flood 3b (Developed Land).</p> <p>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</p> <p>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.</p>
Mr R O'Sullivan	Wey Road and Round Oak Road Residents Association	<p>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</p>	<p>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.</p> <p>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</p>

		<p>Seek to increase the requirement for any development (as redefined to include re-development) to incorporate measures to:</p> <p>a) prevent the impedance of flood water from affecting nearby properties, and</p> <p>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.</p>	<p>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.</p>
Ms N Nockles	Resident	<p>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.</p>	<p>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).</p> <p>The Council's SFRA (2015) is a 'living document' acknowledging that the Environment Agency reviews and updates the Flood Map for Planning</p>
Miss G Pacey	Runnymede Borough	<p>Yes. Lots of helpful guidance for applicants.</p> <p>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?</p>	<p>Noted</p> <p>Agreed. Amendment made.</p>
Mr Temple	Brooklands Museum Trust	<p>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.</p>	<p>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.</p>
Mr Cooke	Thames Ditton & Weston Green	<p>Partly. Our concern here mainly lies with the ability, or otherwise, of Case Officers, frequently with very limited</p>	<p>Noted. An FRA should be undertaken by a suitably qualified person e.g. drainage engineer (recognised</p>

	Residents Association	<p>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.</p> <p>In fact, this concern also covers other aspects of the Plan.</p> <p>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.</p>	<p>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.</p>
Cllr Axton	Molesey Residents Association	<p>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.</p> <p>In fact, this concern also covers other aspects of the Plan.</p> <p>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.</p>	<p>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.</p>
Sue Janota	Surrey County Council	<p>2.5.8: Page reference – should it be 24 not 15?</p> <p>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</p>	<p>Agreed. Amendment made.</p> <p>Agreed. Amendment made.</p>

		Council's website (http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice)	
Jack Moeran	Environment Agency	<p>Page 38, 'Floodplain Compensation Storage'. 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.</p> <p>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.</p> <p>Page 40, 2.5.25 When considering minimum length of voids, could '1m' be changed for '1 metre' please.</p>	<p>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</p> <p>Noted.</p>