

**Spelthorne Borough Council**

**Flood Risk Sequential and Exception Test Statement**

**Revision 4**

Prepared by Spelthorne Borough Council

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# 1. Background and National Policy

## National Planning Policy Framework

- 1.1 National planning policy contained in the National Planning Policy Framework<sup>1</sup> (NPPF) advocates a sequential approach to flood risk, the aim of which is to steer new development to areas with the lowest probability of flooding. Section 14 addresses “Meeting the challenge of climate change, flooding and coastal change” with paragraphs 159 to 169 covering Planning and Flood Risk<sup>2</sup>.

### National Planning Policy Framework: Planning and flood risk

**159.** Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

**160.** Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

**161.** All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

(a) applying the sequential test and then, if necessary, the exception test as set out below.

(b) safeguarding land from development that is required, or likely to be required, for current or future flood management.

(c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and

(d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

**162.** The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower

<sup>1</sup> Ministry of Housing, Communities and Local Government. July 2021. *National Planning Policy Framework*. <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

<sup>2</sup> Paragraph numbers stated here refer to the 2021 version of the NPPF, which the Plan is examined against - <https://webarchive.nationalarchives.gov.uk/ukgwa/20230830172251/https://www.gov.uk/government/publications/national-planning-policy-framework-2>. Paragraphs 159 to 169 of the 2021 Framework correlate to paragraphs 165 to 175 of the 2023 version..

risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.

**163.** If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

**164.** The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

**165.** Both elements of the exception test should be satisfied for development to be allocated or permitted.

- 1.2 The NPPF is clear that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 1.3 The sequential approach is a decision-making tool designed to ensure that sites at little or no risk of flooding are developed in preference to sites at higher risk. The subsequent application of the Exception Test, where required, will ensure that new developments in flood risk areas will only occur where flood risk is outweighed by other sustainability drivers.
- 1.4 The Sequential Test requires an understanding of the risk of flooding from all sources in the study area as well as the vulnerability classification of the proposed developments. The SFRA prepared for Spelthorne Borough Council and the associated mapping provides an assessment of flood risk from all sources in the Borough. Flood risk vulnerability classifications for different development types, as defined in NPPF Annex are presented in

1.5 Table 1.

1.6 The national Planning Practice Guidance (PPG) on Flood Risk and Coastal Change<sup>3</sup> provides a flow diagram which sets out how flood risk should be taken into account in the preparation of strategic policies This is reproduced in Figure 1.

1.7 The flow diagram presented in Figure 2 (PPG Diagram 2) illustrates how the Sequential Test process should be applied to identify the suitability of a site for allocation, in relation to the flood risk classification.

1.8 Where it has been determined that the Sequential Test has been satisfied, and there are no reasonable available alternative sites in an area of lower flood risk where the development could be located, the incompatibility matrix in PPG Table 2 (reproduced in Table 3) should be used to determine whether the Exception Test will need to be applied.

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<sup>3</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government. August 2022. *Planning Practice Guidance: Flood risk and coastal change*. <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Figure 1 Taking flood risk into account in the preparation of strategic policies (PPG Diagram 1)

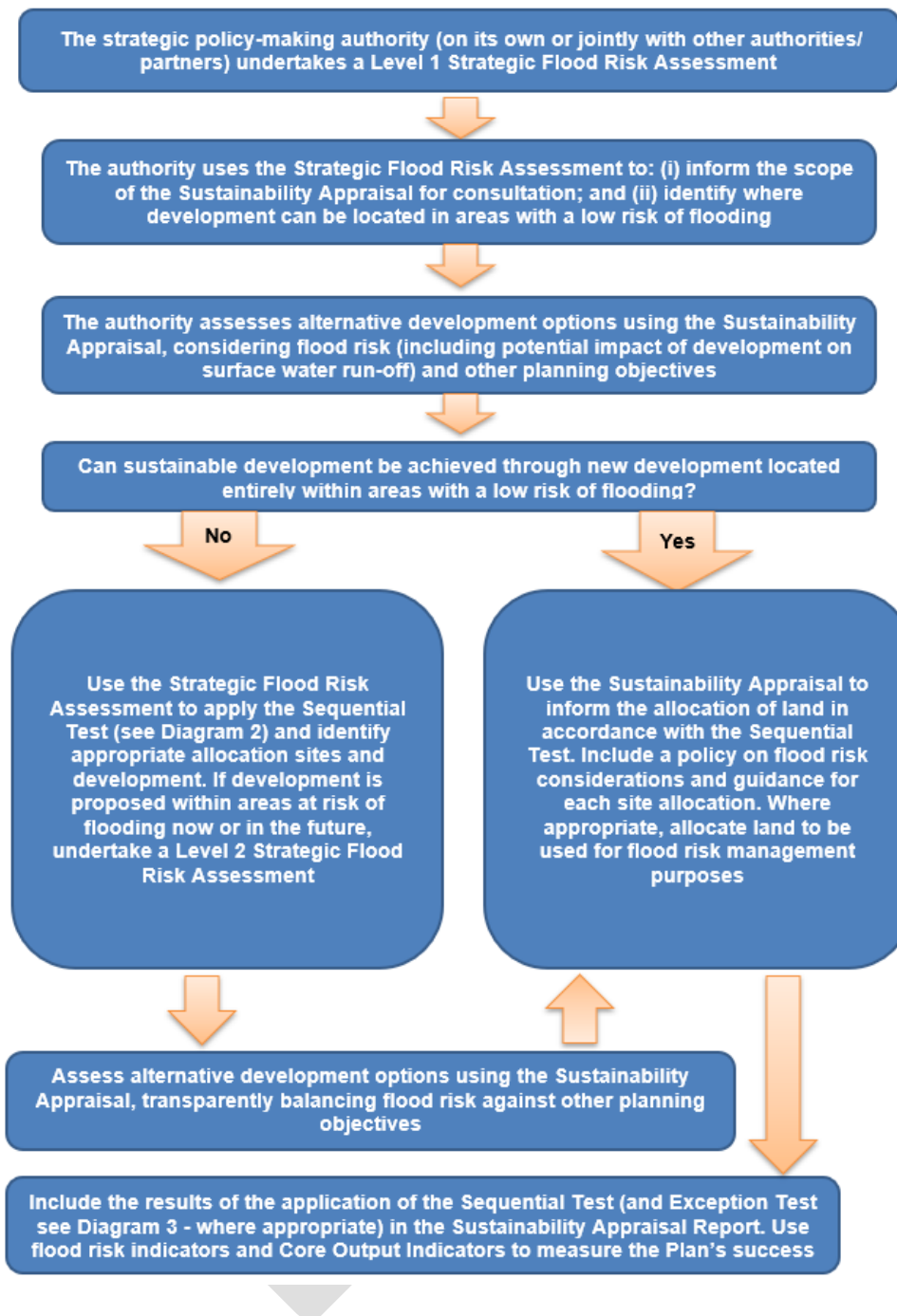


Table 1 Flood risk vulnerability classification

(Source: NPPF Annex 3)

### Essential infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons<sup>4</sup>
- Wind turbines.
- Solar farms.

### Highly vulnerable

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent<sup>5</sup>.

### More vulnerable

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill<sup>6</sup> and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

### Less vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works<sup>7</sup>

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<sup>4</sup> including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations storage; and water treatment works that need to remain operational in times of flood.

<sup>5</sup> Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.

<sup>6</sup> Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#).

<sup>7</sup> if adequate measures to control pollution and manage sewage during flooding events are in place.

- Car parks
- Water-compatible development
- Flood control infrastructure
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

Figure 2 Application of the Sequential Test for plan preparation (PPG Diagram 2)

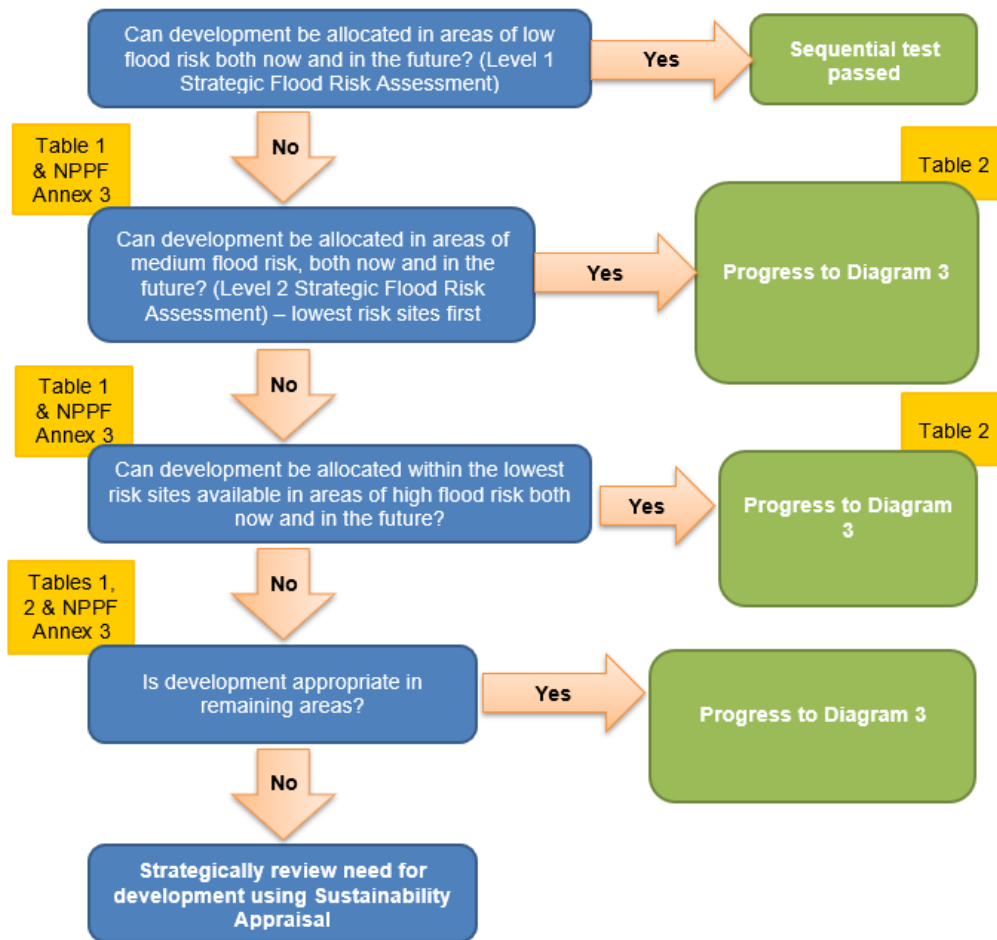
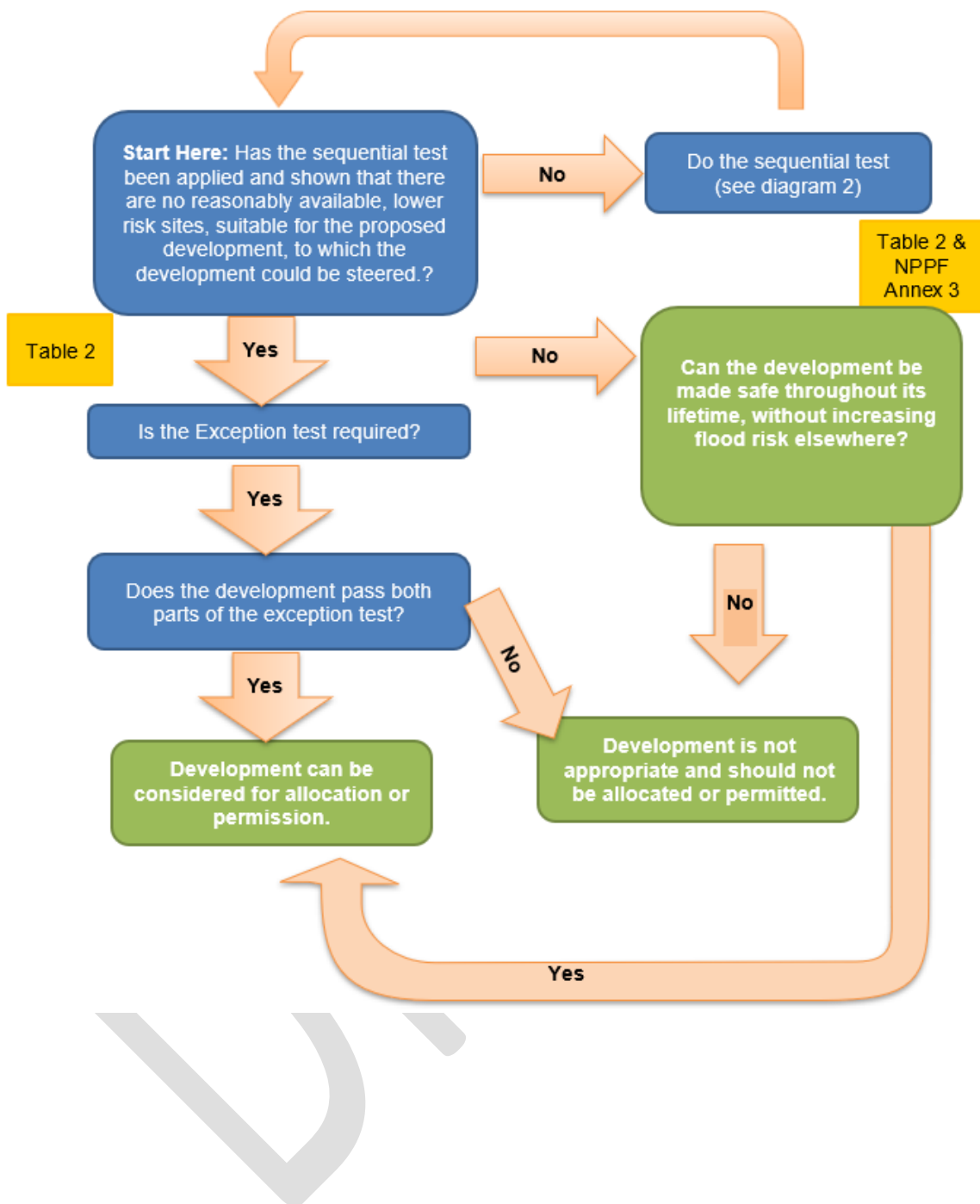


Figure 3 Application of the Exception Test to plan preparation (PPG Diagram 3)



## Local Planning Policy Background in Spelthorne

- 1.9 Spelthorne Borough Council has been preparing its new Local Plan. This has involved the preparation of a number of evidence base documents to underpin the Local Plan followed by the Council's Issues and Options public consultation in May-June 2018. This consultation set out four options for meeting Spelthorne's Objectively Assessed Housing Need (OAN) and two of these options included allocating sites which are currently within the Green Belt as capacity in the urban area is limited. These consultation documents confirmed that on the basis of the evidence gathered at the time, the Council had insufficient suitable, available and achievable sites to meet its proportion of the objectively assessed needs (OAN) for housing as set out in the Runnymede Spelthorne Strategic Market Housing Assessment (SHMA) (552-757 dwellings per annum (dpa)).
- 1.10 The IOPA document set out the Council's preferred spatial strategy option for Runnymede as providing between 300-380dpa. To meet this annual housing target, the IOPA document proposed a number of Green Belt releases. These Green Belt releases were assessed through a draft strategic sequential test (SST) in advance of the IOPA consultation. This draft SST was shared with the Environment Agency in June 2016 (see appendix 1). On the basis of this initial SST, officers were satisfied that all of the Council's preferred housing allocations were, from a flood risk perspective, preferential sites for development. The Additional Sites and Options consultation proposed an increase in the housing target to 408-427dpa.
- 1.11 The production of a SST is considered necessary as the Council's evidence shows that the Council is not able to meet its proportion of its OAN across the Plan period from suitable, available and achievable sites in areas at low risk of flooding, when other constraints to development are also taken into consideration. The Council's detailed site selection work<sup>8</sup> has provided recommendations on which sites are most suitable for allocation through the Local Plan when assessed against a range of accessibility, constraints (including flood risk) and performance against Green Belt purposes.
- 1.12 Site allocations for the Spelthorne Local Plan are informed by the Strategic Land Availability Assessment (SLAA). The SLAA looks at known potential development sites and assesses their suitability, availability and achievability, including consideration of the flood zone in which the site is located. Where all the criteria are met, this assessment of potential capacity provides the evidence for making Local Plan allocations.
- 1.13 As part of the site allocations process, the Council has undertaken a Sequential Test of SLAA sites to assess the level of flood risk present on each site and to steer development to sites at a lower risk of flooding where appropriate, while considering the necessity to develop on previously developed land in Staines-upon-Thames. There are limited brownfield sites available for development in Flood Zone 1 and it is therefore likely to be necessary to locate some development in Flood Zones 2 and 3a when considering the need to regenerate brownfield sites, and to locate development in the main town centre locations to minimise carbon emissions and the need to travel.

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<sup>8</sup> [https://spelthornelocalplan.info/wp-content/uploads/sby-local-media/Evidence\\_Base/Site\\_Selection/SSL002-Draft-Local-Plan-Reg-19-Site-Allocations-Officer-Site-Assessments.pdf](https://spelthornelocalplan.info/wp-content/uploads/sby-local-media/Evidence_Base/Site_Selection/SSL002-Draft-Local-Plan-Reg-19-Site-Allocations-Officer-Site-Assessments.pdf)

## Assessing flood risk

1.14 The SLAA sites have been assessed to determine the risk of flooding from all sources. Analysis of the sites has used information contained in the Environment Agency Flood Map for Planning (Rivers and Sea), Spelthorne BC Strategic Flood Risk Assessment and Surrey County Council Local Flood Risk Management Strategy. The following criteria have been reviewed for each site:

- Proportion in Flood Zone 1, 2 and 3a, as shown on the Flood Map for Planning (Rivers and Sea).
- Proportion within Flood Zone 3b (defined using the modelled 3.3% AEP flood event from the latest fluvial models for the River Thames (Datchet to Teddington, 2023).
- Hazard ratings on the site and access route during the modelled 1% AEP flood event including an allowance for climate change from available modelled rivers (as reported in the Strategic Flood Risk Assessment).
- Recorded Flood Outlines.
- Number of internal and external property flooding records within 500m of the site.
- Number of Historic Flood Incident records within 500m of the site.
- Number of Surrey CC Wetspot locations<sup>9</sup> within 500m of the site.
- Susceptibility of the site and its local area to surface water flooding based on a review of the Risk of Flooding from Surface Water mapping and the Surrey CC Wetspot locations.
- Susceptibility of the site and its local area to groundwater flooding based on a review of the BGS Susceptibility to Groundwater Flooding mapping and historic records.

## Flood Zone Definitions

1.15 The NPPF assesses the probability of flooding from rivers and the sea by categorising areas into Flood Zones of low, medium and high probability, as defined in Table 2 and presented on the Flood Map for Planning (Rivers and Sea)<sup>10</sup>.

Table 2 Flood Zones (PPG Table 1)

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
Zone 2 Medium Probability	Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain

<sup>9</sup> 'Wetspot' is a term used by SCC as the LLFA to describe the location of a surface water flooding incident that has been reported. The wetspot database is continually updated to produce a comprehensive map and record of all the identified wetspots in Surrey. Information from Surrey risk management authorities informs the database. SCC currently prioritises capital works at wetspots throughout the county based on a number of factors. These factors include safety, internal property flooding, social impact and duration of flooding. Details of these specific factors have not been supplied for the purposes of the SFRA. <https://www.surreycc.gov.uk/roads-and-transport/roadworks-and-maintenance/report-a-highway-problem/drainage-and-flooding/flooding-and-wetspots>

<sup>10</sup> Environment Agency. Flood Map for Planning (Rivers and Sea) <https://flood-map-for-planning.service.gov.uk/>

	<p>should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:</p> <ul style="list-style-type: none"> <li>• land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or</li> <li>• land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).</li> </ul> <p>Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)</p>
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Note: The Flood Zones shown on the Environment Agency’s Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

Table 3 Flood risk vulnerability and flood zone ‘incompatibility’ (PPG Table 2)

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓*

Key:  
✓ Exception test is not required

**X** Development should not be permitted

Notes:

- *This table does not show the application of the [Sequential Test](#) which should be applied first to guide development to the lowest flood risk areas; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;*
- *The Sequential and [Exception Tests](#) do not need to be applied to those developments set out in [National Planning Policy Framework footnote 56](#)<sup>11</sup>. The Sequential and Exception Tests should be applied to ‘major’ and ‘non major’ development.*
- *Some developments may contain different elements of vulnerability and the highest vulnerability category should be used unless the development is considered in its component parts.*

*“+” In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.*

*“\*” In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:*

- *remain operational and safe for users in times of flood.*
- *result in no net loss of floodplain storage.*
- *not impede water flows and not increase flood risk elsewhere.*

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<sup>11</sup> Footnote 60 in 2022 NPPF

## 2. Sequential Test Statement

- 2.1 The results from the site analysis have been used to apply a sequential approach to the location of development in Spelthorne. Table 5 through to

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- 2.2 Table 14 present the sites in groups with increasing risk of flooding from all sources. The tables contain justification for those sites that have not been taken forward in the Local Plan. Sites that have been put forward in the Local Plan are highlighted in bold along with the number of units and an indicative plan period for delivery.
- 2.3 A summary of these tables is provided in Table 4 including the number of units that can be delivered within each group of sites. The sites are not always grouped by land type (i.e., greenfield or previously developed), however this is included within the tables for reference.

Table 4 Summary of sequential assessment of sites and number of units

Description of the risk of flooding from all sources	Number of Units <sup>12</sup>	Total (cumulative) number of units <sup>13</sup>
Table 5 Urban sites at lowest risk of flooding from rivers and surface water	229	229
Table 6 Greenfield sites at low risk of flooding from rivers and surface water	400	629
Table 7 Sites at low risk of flooding from rivers, and medium to high risk of flooding from surface water (either on the site or on the access route)	1,462	2,091
Table 8 Sites within Flood Zone 2 as defined by historic flooding outlines not modelled flooding	653	2,744
Table 9 Sites at risk of flooding from rivers (Flood Zone 2 or 3), with access that is either dry or low hazard rating	1056	3,800
Table 10 Sites wholly in Flood Zone 3, with access at low hazard	32	3,832
Table 11 Sites in Flood Zone 3, with pedestrian access at low hazard	990	4,822
Table 12 Sites primarily in Flood Zone 1 and 2 with no access that is either dry or low hazard	1,129	5,951
Table 13 Sites in Flood Zone 3, with no access that is either dry or low hazard	172	6,123
Table 14 Sites partially within Flood Zone 3b	258	6,381

- 2.4 The Local Plan housing requirement is **9,270** dwellings 2022-2037. Of the sites at lowest risk of flooding, whether on brownfield or greenfield land, there is capacity for **629** dwellings (sites highlighted in bold in Table 5 and Table 6). When including sites at low risk of flooding from rivers and medium risk of surface water flooding (either on the site or within the surrounding area), there is capacity for a total of **2,744** (sites highlighted in bold in Table 7 and Table 8). Including sites in Flood Zone 3 where vehicular access is available either dry or at low hazard, there is capacity for a total of **3,832** (sites highlighted in bold in Table 9 and Table 10).

<sup>12</sup> Some site allocations say "up to X number of units". The maximum number has been used in this document

<sup>13</sup> Some site allocations say "up to X number of units". The maximum number has been used in this document

- 2.5 Additional land is therefore required to meet housing need and Spelthorne BC need to consider remaining sites.
- 2.6 The remaining sites have more limited options with respect to access during the fluvial design flood event. Two sites in Flood Zone 3, with potential for pedestrian access at low hazard provides capacity for **990** (sites highlighted in bold in Table 11). Sites primarily within Flood Zone 1 and 2, but with no access route that is dry or low hazard provides **1,129** units (sites highlighted in bold in Table 12).
- 2.7 Three sites in Staines (sites highlighted in bold in Table 13) are located in Flood Zone 3, with no provision of access that is dry or at low hazard, providing capacity for **172**.
- 2.8 Four sites in Staines are partially with Flood Zone 3b, with no provision of access that is dry or at low hazard, providing capacity for **258** (sites highlighted in bold from

2.9 Table 14).

2.10 All the sites highlighted in bold in Table 5 through to Table 14 are considered to pass the Sequential Test, as **there are no available alternative sites at lower risk of flooding in Spelthorne.**

2.11 This provides a total capacity of **6,381** against the requirement of **9,270** dwellings.

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Table 5 Urban sites at lowest risk of flooding from rivers and surface water

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
AC1/003	0.15	Land at 201 Feltham Hill Road, TW15 1HJ	URBAN, PDL			Below site size threshold	Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AC2/004	0.26	381-385 Staines Road West, TW15 1RH	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AC2/009	0.1	Rowland Pine Centre, 373 Staines Road West, TW15 1RP	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE1/001	0.1	525 Staines Road West, TW15 2AB	URBAN, PDL			Below site size threshold	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE1/008	0.14	487-491 Staines Road West, TW18 2AB	URBAN, PDL			Planning permission granted	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE3/007	0.14	R/O 6-10 Reedsfield Road, TW15 2HE	URBAN, PDL			Potential ownership complexities	Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AS2/003	0.22	648 London Road, TW15 3AW	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low.	Potential at surface	100	0	0	0	None	0	0	2	0	N/A	N/A
AS2/005	1.87	Land west of Edward Way Edward Way,	GB, GF			Green Belt. Adjacent to SNCI – potential negative environmental impacts. Cumulative impact of development along this stretch of the A30 would be contrary to the selection criteria of Green Belt sites which focuses on dispersal of development. Potential road safety concerns of additional site access along A30 in conjunction with AS2/006.	Yes	Low.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AT3/008	0.12	The Old Post Office, 1 Knapp Road, TW15 2JA	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT3/009	0.26	Ashford Telephone Exchange Church Road, TW15 2TS	URBAN, PDL	Year 11-15	20		Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AT3/010	0.11	37-39 Woodthorpe Road, TW15 2RP	URBAN, PDL			Site not available	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT3/016	0.24	23-31 (not 11-19) Woodthorpe Road, TW15 2RP	URBAN, PDL	Year 1-5	120		Yes	Low on site	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
LS3/004	0.05	Ashborne Hall Littleton Road, TW15 1UQ	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium in local area/access.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
LS3/005	0.26	404-412 Staines Road West, TW15 1RZ	URBAN, PDL			Availability and suitability issues	Yes	Low on site. Medium in local area/access.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
SE1/005	0.8	Benwell House Green Street, TW16 6QF	URBAN, PDL	Year 1-5	39		Yes	Low	Potential at surface	100	0	0	0	None	6	0	0	4	1	0

SE1/006	0.1	Saxon House Downside, TW16 6RT	URBAN, PDL			Included in office to residential prior approval allowance	Yes	Medium on access.	Potential at surface	100	0	0	0	None	6	0	0	4	1	0
SE1/009	0.08	Manor Farm Cottage, 126 Green Street, TW16 6QJ	URBAN, PDL			Below site size threshold	Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	1	1	0
SE1/010	0.08	Ritzbury House, Bridge Foot Green Street, TW16 6QA	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	100	0	0	0	None	6	0	0	4	1	0
SE1/011	0.07	75-77 Green Street, TW16 6RD	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	100	0	0	0	None	4	0	18	1	1	0
SE1/020	0.43	<b>Sunbury Adult Education Centre The Avenue, TW16 5DZ</b>	URBAN, PDL	Year 6-10	30		Yes	Low	<b>Potential at surface</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>None</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>N/A</b>	<b>N/A</b>
SE1/025	0.25	<b>Elmbrook House, 18- 19 Station Road, TW16 6SU</b>	URBAN, PDL	Year 6-10	20		Yes	Low	<b>Potential at surface</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>None</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>0</b>
SN1/002	0.74	Camgate Centre Long Lane, TW19 7AX	URBAN, PDL			Designated employment area and non-employment use unlikely to be suitable. The site is not well served by local services and public transport.	Yes	Low on site. Medium on access routes.	Potential at surface	100	0	0	0	None	0	0	2	4	14	3
ST1/006	0.88	233-269 London Road, TW18 4HR	URBAN, PDL			Site unsuitable for residential use. Designated employment area.	Yes	Medium adjacent to site.	Not prone	100	0	0	0	None	16	0	20	0	N/A	N/A

229 Units (Total 229)

DRAFT

Table 6 Greenfield sites at low risk of flooding from rivers and surface water

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
HS1/005	1.05	Land adjacent to Squires Garden Centre Halliford Road, TW17 8SG	GB, GF			Designated Green Belt that is important strategically with limited contribution to spatial strategy. Small size with limited housing yield – not considered to outweigh harm.	Yes	Low	Potential at surface	100	0	0	0	None	2	0	16	0	1	3
HS1/006	12.46	Land at Hazelwood and Upper Halliford Road Upper Halliford Road, TW16 6QU	GB, GF			Site is considered unsuitable to take forward as it is identified within a strategically important swathe of Green Belt which is strongly performing in Stage 1 and in Stage 2 of the Green Belt Assessment and subsequently does not meet the preferred spatial strategy. Large amount of housing proposed which is contrary to the strategy. The loss of the open space will have a significant impact on the immediate adjoining properties of the site in terms of loss of view. The site performed negatively against many of the environmental Sustainability Appraisal objectives as is open greenfield land.	Yes	Low	Potential at surface	95	5	0	0	06DecemberWinter2000, 06JanuaryNewYear2003, EA06Winter13-14	0	0	0	0	0	3
HS1/008	12.64	Land north of Charlton Lane Charlton Lane,	GB, GF			The site makes a limited contribution to spatial strategy as housing use which is the priority need is not proposed. The site performed strongly in the Green Belt Assessment Stage 1 and moderately at Stage 2, although it was identified as playing a fundamental role in the wider strategic Green Belt.	Yes	Low	Potential at surface	96	4	0	0	06JanuaryNewYear2003	0	0	2	3	4	10
HS1/009	2.28	Bugle Nurseries, 171 Upper Halliford Road, TW17 8SN	GB, MIXED	Year 1-5	79		Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	1	0	3
HS1/012b	2.34	Land east of Upper Halliford Road (Site B) Upper Halliford Road, TW16 6JL	GB, GF	Year 6-10	41		Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	1	1	3
HS1/014	0.25	137 Upper Halliford Road, TW17 8SN	GB, GF			The site is considered to make a limited contribution to the spatial strategy due to its small size, lack of opportunity to meet community needs and Green Belt performance. The site is within a strongly performing area of Green Belt and is	Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	0	0	3

						not recommended for further consideration in the Green Belt Assessment. The overall integrity of the Green Belt would be affected negatively.														
HS1/016	1.53	The Old Nursery Highfield Road, TW16 6DL	GB, GF			small in size and partly PDL but does not contribute to meeting specific needs and is within a parcel of moderately performing but strategically important Green Belt.	Yes	Low	Potential at surface	100	0	0	0	None	16	2	30	0	1	0
HS1/017	0.26	99 Halliford Road, TW16 6DN	GB, PDL			Overall, the Green Belt performance and limited PDL does not comply with the spatial strategy and the limited opportunity for further benefits means it is not appropriate to consider further.	Yes	Low	Potential at surface	100	0	0	0	None	12	2	24	0	1	0
LS1/006	0.93	Land at Windmill Close Windmill Close, TW16 7HU	GB, GF			Site not available	Yes	Medium	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
LS1/024	1.63	Land at Staines Road West and Cedar Way Staines Road West, TW16 7BL	GB, GF	Year 1-5	77		Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
SC1/009	6.68	Land to the North of M3 J1, TW16 5LN	GB, GF			Flood Zone 1. Local area Flood Zone 2 from historic flood outline, not modelled to flood during 1% AEP plus climate change. Promoted for employment use and designated Green Belt (strongly performing) therefore not compliant with spatial strategy.	Yes	Low	Potential at surface	99.99	0.01	0	0	None	0	0	0	3	N/A	N/A
SC1/010	10.44	Land East of Groveley Road and Vicarage Road Groveley Road and Vicarage Road, TW16 7QQ	GB, GF			98% Flood Zone 1. Felthamhill Brook along southern edge of site. Strongly performing Green Belt and strategically important.	Yes	Medium.	Potential at surface	98.3	1.7	0	0	None	0	0	0	3	N/A	N/A
SN1/003a	0.53	Land at Stanwell Farmhouse Bedfont Road, TW19 7LY	GB, MIXED			The strong Green Belt performance means that release could potentially harm the overall strategic Green Belt. Heathrow Expansion uncertainty associated with this at present.	Yes	Low on site. Medium on access routes.	Potential at surface	100	0	0	0	None	0	0	0	2	14	3
SN1/003b	0.18	Land at Stanwell Farmhouse (West) Bedfont Road, TW19 7LY	GB, MIXED			The strong Green Belt performance means that release could potentially harm the overall strategic Green Belt. Heathrow Expansion uncertainty associated with this at present.	Yes	Low on site. Medium on access routes.	Potential at surface	100	0	0	0	None	0	0	0	2	14	3
SN1/006	4.83	Land to the west of Long Lane and South of Blackburn Trading Estate Long Lane, TW19 7AN	GB, GF	Year 1-5	200		Yes	Low / Medium	Potential at surface	92	7	0	0	06JanuaryNewYear2003	0	0	6	6	14	3

SN1/007a	1.95	Land at Green Acre Farm (north) Bedfont Road, TW19 7LY	GB, GF			Site not considered appropriate to take forward due to performance against Green Belt purposes and taking account of limited contribution to spatial strategy. Uncertainty around Heathrow expansion. Employment use proposed – at odds with spatial strategy.	Yes	Low on site. Medium on access routes.	Potential at surface	100	0	0	0	None	0	0	0	2	14	3
SN1/007b	3.58	Land to the east of Long Lane Long Lane, TW19 7AX				Site not considered appropriate to take forward due to performance against Green Belt purposes and taking account of limited contribution to spatial strategy. Uncertainty around Heathrow expansion. Employment use proposed – at odds with spatial strategy.	Yes	Low on site. Medium on access routes.	Potential at surface	100	0	0	0	None	0	0	2	4	14	3
SN1/007c	4.48	Land at Long Lane/Short Lane Long Lane, TW6 3PF				Site not considered appropriate to take forward due to performance against Green Belt purposes and taking account of limited contribution to spatial strategy. Uncertainty around Heathrow expansion.	Yes	Low on site. Medium on access routes.	Potential at surface	100	0	0	0	None	0	0	2	4	14	3
SN1/008	26.53	Land south of Southern Perimeter Road, TW6 3PF	GB, GF			Site not considered appropriate to take forward due to performance against Green Belt purposes, limited contribution to spatial strategy and visual impacts.	Yes	Low to medium.	Potential at surface	100	0	0	0	None	2	0	8	1	14	3
SN1/017	0.72	Gleneagles Farm Gleneagles Close, TW19 7PD	GB, MIXED			Strongly performing Green Belt and makes an important contribution to its strategic function	Yes	Low	Potential at surface	100	0	0	0	None	2	0	2	1	14	3
SN1/018	1.27	Longford House and adjoining land Long Lane, TW19 7AT	GB, MIXED			Medium surface water risk along access routes. Economic uses promoted – at odds with spatial strategy for GB release. Site already in commercial use – limited benefit from allocation.	Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	3	14	3
ST1/017	21.64	Hengrove Farm London Road, TW18 4JX	GB, GF			Site and access not at risk during 1% AEP incl. CC. Strongly performing Green Belt and expectation to restore once mineral workings complete.	Yes	Low. Waterbody on site.	Potential at surface	95.11	4.89	0	0	06MarchSpring1947, EA06Winter13-14	0	0	14	2	N/A	N/A
ST1/043	0.27	Land West of 355 London Road, TW18 4JY	GB, GF	Year 1-5	3		Yes	Low	Not prone	100	0	0	0	None	0	0	0	0	N/A	N/A

400 Units (Total 629)

Table 7 Sites at low risk of flooding from rivers, and medium to high risk of flooding from surface water (either on the site or on the access route)

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
AC1/005	0.19	8-12 Junction Road, TW15 1NQ	URBAN, PDL			Site not available.	Yes	Low on site. Medium to High on access routes.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AC1/006	0.14	12 Park Road, TW15 1EY	URBAN, PDL			Site not available.	Yes	Low on site. Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AC1/007	0.18	Land to rear of 109 Ashgrove Road, TW15 1NY	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AC3/006	0.08	51-53 Alexandra Road, TW15 1TW	URBAN, PDL			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Site not available.	Yes	Low on site. Medium in local area.	Potential at surface	0	100	0	0	None	0	0	0	1	N/A	N/A
AE1/003	0.56	Ashford Manor Golf Club Fordbridge Road, TW15 3RT	GB, GF			Limited positive response at preferred options stage. No wider benefits identified.	Yes	Low. Medium in surrounding area.	Potential at surface	99.49	0.51	0	0	None	0	0	0	3	N/A	N/A
AE1/004	0.12	7 Manor Road, TW15 2SL	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AE1/007	0.58	Ashford Manor Golf Course (site 2) Manor Road, TW15 2SN	GB, GF			Limited positive response at preferred options stage. No wider benefits identified.	Yes	Low. Medium in surrounding area.	Potential at surface	99.55	0.45	0	0	None	0	0	0	1	N/A	N/A
AE2/001	0.04	1-3 Echelforde Drive, TW15 2ER	URBAN, PDL			Below site size threshold.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE3/002	0.06	Land to west of 39 Feltham Road, TW15	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE3/003	0.05	71-75 Feltham Road, TW15 1DB	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE3/005	0.46	28-44 Feltham Road, TW15 1DL	GB, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE3/006	1.31	158-166 Feltham Road, TW15 1YQ	URBAN, PDL	Year 6-10	75		Yes	Medium	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AE3/008	0.08	21 Chattern Hill, TW15 1BZ	URBAN, PDL			Below site size threshold.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AE3/009	1.66	Land at Chattern Hill Chattern Hill,	GB, GF			Site not available for residential use. Potential access issues.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A

AS1/001	3.98	Tesco Extra Town Lane, TW14 8RW	URBAN, PDL	Year 6-10	350		Yes	Medium to High, on site and in local area.	Potential at surface	100	0	0	0	None	0	0	4	2	14	3
AS1/003	0.43	Staines Fire Station Town Lane, TW19 7JP	URBAN, PDL	Year 6-10	50		Yes	Medium in local area. Culverted watercourses.	Potential at surface	100	0	0	0	None	0	0	0	1	14	3
AS1/004	0.16	Happy Landing PH Clare Road, TW19 7QT	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	At risk of SW flooding.	Medium to High in surrounding area.	Potential at surface	100	0	0	0	None	0	0	4	1	14	3
AS1/005	0.39	524-538 London Road, TW15 3AE	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium in local area. Culverted watercourses.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AS1/006	0.19	Garage Court to rear of Elsinore Avenue, TW19 7SX	URBAN, PDL			Ownership complexities.	At risk of SW flooding.	Medium to High in surrounding area.	Potential at surface	100	0	0	0	None	0	0	6	3	14	3
AS1/007	0.1	Garage Court to rear of Ensign Way, TW19 7RE	URBAN, PDL			Below site size threshold.	At risk of SW flooding.	Medium to High in surrounding area.	Potential at surface	100	0	0	0	None	0	0	4	0	14	3
AS1/008	0.82	Ashford Hospital (East Yard) Town Lane, TW15 3AA	URBAN, PDL			Site with full planning permission	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	6	3	14	3
AS1/009	0.23	540-544 London Road, TW15 3AE	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium in local area. Culverted watercourses.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AS1/010	0.11	484 London Road, TW1 53AD	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AS1/011	0.3	Land at Former Bulldog Nurseries London Road,	GB, GF	Year 1-5	24		Yes	Medium in local area. Culverted watercourses.	Potential at surface	100	0	0	0	None	0	0	0	2	14	3
AS2/001	0.25	Ashford Youth Club Kenilworth Road, TW15 3EL	URBAN, PDL	Year 11-15	5		Yes	Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AS2/002	0.59	Works adj Harrow Road, TW14 8RW	URBAN, PDL			Delivery issues – adjacent to AS1/006	Yes	Low on site. Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AS2/006	3.33	Land east of Desford Way Desford Way,	GB, GF	Year 1-5	15		Yes	Medium in local area.	Potential below ground	100	0	0	0	None	0	0	0	0	N/A	N/A
AT1/001	1.57	Hitchcock and King Stanwell Road, TW15 3DX	URBAN, PDL			Site not available – developed for retail use.	Yes	Medium	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT1/002	1.15	Ashford Sports Club Woodthorpe Road, TW15 3JX	GB, GF	Year 1-5	108		Yes	Medium - High in local area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT1/010	0.12	Harper House Fordbridge Road, TW15 2TB	URBAN, PDL			Already self-contained units on site	Yes	Medium - High in local area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT1/011	0.09	Universal Creations, 134 Chesterfield Road, TW15 2ND	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AT2/001	0.08	145-149 Stanwell Road, TW15 3QN	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium - High in local area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AT2/002	0.06	156-158 Chesterfield Road, TW15 3PT	URBAN, PDL			Below site size threshold	Yes	Medium - High in local area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A

AT3/001	0.09	Headline House Stanwell Road, TW15 3QH	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT3/002	0.05	55A Woodthorpe Road, TW15 2RP	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Potential at surface	100	0	0	0	None	0	0	0	1	N/A	N/A
AT3/007	0.2	Ashford Multi-storey car park Church Road, TW15 2TY	URBAN, PDL	Year 1-5	55		Yes	Low on site. Medium/High in local area.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AT3/014	0.03	176 Stanwell Road, TW15 3QS	URBAN, PDL			Below site size threshold	Yes	Medium - High in local area.	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
AT3/015	0.04	68 Church Road, TW15 2TW	URBAN, PDL			Below site size threshold	Yes	Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AT3/017	0.06	51-53 Church Road, TW15 7TY	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium/High in local area.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
AT3/018	0.2	Atrium, 31-37 Church Road, TW15 2UD	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium/High in local area.	Potential at surface	100	0	0	0	None	0	0	0	0	N/A	N/A
HS1/001	0.1	R/O The Goat Public House, 47 Upper Halliford Road, TW17 8RX	GB, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium in local area.	Potential at surface	100	0	0	0	None	0	0	0	0	0	3
HS1/002	1.68	Land at Croysdale Avenue Croysdale Avenue, TW16 6QN	GB, GF	Year 1-5	67		Yes	Low on site, medium on access.	Potential below ground	100	0	0	0	None	4	0	18	1	1	0
HS1/003	2.42	Land to N of Croysdale Avenue Croysdale Avenue, TW16 6QU	GB, GF			Strategic Green Belt	Yes	Low on site, medium on access.	Potential at surface	91.64	8.36	0	0	06DecemberWinter2000, 06JanuaryNewYear2003, EA06Winter13-14	0	0	0	1	1	3
HS1/010	7.75	Land to S and W Stratton Road Stratton Road, TW16 6PG	GB, GF			Lack of community impacts, potential cumulative highways impacts, larger site at odds with spatial strategy	Yes	Low on site, medium on access.	Potential at surface	100	0	0	0	None	0	0	0	2	1	3
HS1/012	1.61	Land East of Upper Halliford Nursery Road, W1G 0JD	GB, GF	Year 1-5	60		Yes	Medium on site.	Potential at surface	100	0	0	0	None	0	0	0	1	1	0
HS2/001	0.08	The Grizzly Bear Public House, 101 Nursery Road, TW16 6LU	URBAN, PDL			Availability and size issues	Yes	Low on site, medium on access.	Potential at surface	100	0	0	0	None	2	0	0	1	1	0
HS2/002	0.09	Land Adjacent 55 Layton's Lane, TW16	URBAN, PDL			Included in HS1/010	Yes	Low on site, medium on access.	Potential at surface	100	0	0	0	None	0	0	0	2	1	0
HS2/004	0.66	Land South of Nursery Road Nursery Road, TW18 6LX	GB, GF	Year 1-5	41		Yes	Medium / High	Potential at surface	100	0	0	0	None	0	0	0	1	1	0
SC1/022	0.4	Oakhall Court Oakhall Drive, TW16 7LE	URBAN, PDL			Flood Zone 1. Local area Flood Zone 2 from historic flood outline, not modelled to flood during 1% AEP plus climate change. Brownfield Tier 2 – site included within SLAA but allocation not required.	Yes	Medium to High on access.	Potential at surface	98.99	1.01	0	0	None	0	0	0	1	N/A	N/A

SE1/008	0.25	Telephone Exchange Green Street, TW16 6QJ	URBAN, PDL	Year 11-15	14		Yes	Medium	Potential at surface	100	0	0	0	None	6	0	0	2	1	0
SE2/002	0.21	292/294 Staines Road East, TW16 5PU	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium	Potential at surface	100	0	0	0	None	16	0	14	2	N/A	N/A
SN1/005	1.75	Land at Northumberland Close Northumberland Close, TW19 7LN	GB, GF	Year 11-15	80		Yes	Medium	Potential below ground	100	0	0	0	None	2	0	2	4	14	3
SN1/012	2.19	Stanwell Bedsits De Havilland Way, TW19 7DE	URBAN, PDL	Year 11-15	175		Yes	Medium	Potential below ground	100	0	0	0	None	2	0	2	3	14	3
SN1/013	0.19	Garage Court to rear of 83-105 Park Road, TW19 7NT	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium on local access routes.	Potential at surface	100	0	0	0	None	0	0	0	0	14	3
SN1/014	1.11	Mentone Farm Bedfont Road, TW19 7LY	GB, MIXED			Strongly performing Green Belt. Promoted for employment use – at odds with strategy	Yes	Medium / High	Potential at surface	100	0	0	0	None	0	0	0	3	14	3
SN1/015	0.64	Land to the west of Town Lane Town Lane, TW19 7RX	GB, GF			Negative feedback at preferred option stage. Visual amenity negative impacts identified	Yes	Medium / High	Potential at surface	100	0	0	0	None	0	0	0	0	14	3
ST1/001	0.11	White Lodge & Land to North/Brecknock Stanwell New Road, TW18 4HY	URBAN, PDL			Site not at risk of flooding from rivers. Access route at low hazard. Below site size threshold	Yes	Medium on local access routes.	Potential at surface	100	0	0	0	None	2	0	6	0	N/A	N/A
ST1/003	0.06	Denby Stanwell New Road, TW18 4HY	URBAN, PDL			Site not at risk of flooding from rivers. Access route at low hazard. Below site size threshold	Yes	Medium on local access routes.	Not prone	100	0	0	0	None	8	0	10	0	N/A	N/A
ST1/004	0.26	193 London Road, TW18	URBAN, PDL			Site and access route at low hazard. Unsuited for residential use – in employment area	Yes	Medium on local access routes.	Not prone	100	0	0	0	None	30	0	22	1	N/A	N/A
ST1/010	0.03	189 London Road, TW18 4HR	URBAN, PDL			Site and access route at low hazard. Below site size threshold	Yes	Medium on local access routes.	Not prone	100	0	0	0	None	30	0	22	1	N/A	N/A
ST1/011	0.03	181 London Road, TW18 4HL	URBAN, PDL			Site and access route at low hazard. Below site size threshold	Yes	Medium on local access routes.	Not prone	100	0	0	0	None	30	0	22	1	N/A	N/A
ST1/022	0.06	39 Gresham Road, TW18 2BD	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium on local access routes.	Potential at surface	100	0	0	0	None	46	0	36	1	2	9
ST1/041	1.47	Land South of Staines Reservoir London Road, TW15 3AB	GB, GF			Site not at risk during 1% AEP incl. CC. Strongly performing Green Belt	Yes	West end of site at medium risk.	Not prone	100	0	0	0	None	0	0	0	0	N/A	N/A
ST1/042	0.48	273-275 London Road, TW18 4JJ	URBAN, PDL			Site not at risk during 1% AEP incl. CC	Yes	Local area at risk.	Not prone	100	0	0	0	None	0	0	10	0	N/A	N/A

						Brownfield Tier 2 – site included within SLAA, but allocation not required.														
ST2/001	0.18	Glenthorne, 33 Rookery Road, TW18 1BT	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium/High	Potential at surface	100	0	0	0	None	4	0	8	2	2	6
ST2/004	0.25	The Retreat Pinewood Drive, TW18 2BD	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. High in local area.	Potential at surface	50.33	49.67	0	0	06MarchSpring1947	46	0	36	1	2	9
ST2/005	0.12	Friendship House, 49-51 Gresham Road, TW18 4BF	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Brownfield Tier 2 – site included within SLAA, but allocation not required. Included in PDO allowance	Yes	Low on site. High in local area.	Potential at surface	100	0	0	0	None	50	0	48	1	2	9
ST2/006	1.36	Builders Yard Gresham Road, TW18 2BE	URBAN, PDL	Year 11-15	343	<b>On edge of 1% AEP plus CC floodplain. Access OK along Kingston Road (some Low hazard).</b>	Yes	Medium in local area.	Potential at surface	99.92	0	0	0.04	06MarchSpring1947	50	0	52	1	2	9
ST2/009	0.03	55 Cherry Orchard, TW18 2DQ	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Below site size threshold.	Yes	Medium in local area.	Potential at surface	100	0	0	0	None	46	0	50	1	2	9
ST2/010	0.07	2 Glebe Road, TW18 1BX	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Below site size threshold.	Yes	Medium/High	Potential at surface	40.23	59.77	0	0	06MarchSpring1947	0	0	6	2	2	6
ST2/025	0.18	Manse and associated land to the rear of Staines Congregational Church Stainash Crescent, TW18 1AY	URBAN, PDL			Site adjacent to River Ash. Site and access not at risk during 1% AEP incl. CC. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium in local area.	Potential at surface	0	97.64	0.12	2.24	06MarchSpring1947, EA06Winter13-14	26	0	28	2	2	6
ST2/026	0.16	Acacia Lodge Rookery Road, TW18 1BT	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium on access routes.	Potential at surface	58.8	41.2	0	0	06MarchSpring1947	14	0	18	3	2	6
ST3/003	0.25	Land off Pullmans Place, TW18 4LD	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Site not available.	Yes	Medium - High in local area.	Not prone	100	0	0	0	EA06Winter13-14	42	0	36	1	N/A	N/A

1,462 Units (Total 2,091)

Table 8 Sites within Flood Zone 2 as defined by historic flooding outlines not modelled flooding

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
AC2/001	0.06	192 Feltham Hill Road, TW15 1LJ	URBAN, PDL			Below site size threshold.	Yes	Low	Potential at surface	65.6	34.4	0	0	None	0	0	0	1	N/A	N/A
AC2/002	0.09	126 Feltham Hill Road, TW15 1HN	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. Medium in local area.	Potential at surface	0	100	0	0	None	0	0	0	0	N/A	N/A
AC2/006	0.11	170/172 Feltham Hill Road, TW15 1LF	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	33.17	66.83	0	0	None	0	0	0	1	N/A	N/A
AC2/007	0.14	180/182 Feltham Hill Road, TW15 1LF	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	31.07	68.93	0	0	None	0	0	0	1	N/A	N/A
AC2/008	0.2	Land at School Road, TW15 2AJ	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low - Medium	Potential at surface	11.15	88.85	0	0	None	0	0	0	2	N/A	N/A
AC3/001	2.3	Lakeside Chertsey Road, TW16 7LN	GB, GF			Strategically important Green Belt	Yes	Low on site. Medium in local area.	Potential at surface	86.82	13.18	0	0	None	0	0	0	1	N/A	N/A
AC3/004	0.1	DC Hill & Son (Textiles) Ltd, Hill House Alexandra Road, TW15 1TN	URBAN, PDL			Below site size threshold.	Yes	Low	Potential at surface	49.7	50.3	0	0	None	0	0	0	2	N/A	N/A
AC3/005	0.07	195 Staines Road West, TW16 7BH	URBAN, PDL			Not available.	Yes	Low	Potential at surface	11.5	88.5	0	0	None	0	0	0	2	N/A	N/A
AC3/007	0.14	87 Cadbury Road, TW16 7LS	URBAN, PDL			Site in dry island in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. TPO constraint on site	Yes	Low	Potential at surface	100	0	0	0	None	0	0	0	2	N/A	N/A
SC1/002	0.11	115 Staines Road West, TW16 7BQ	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	0	100	0	0	None	0	0	0	3	N/A	N/A
SC1/003	0.08	147 Staines Road West, TW16 7BQ	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	75.03	24.97	0	0	None	0	0	0	3	N/A	N/A
SC1/004	0.31	Sunbury Fire Station Staines Road West, TW16 7BG	URBAN, PDL			Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low	Potential at surface	0	100	0	0	None	6	0	0	4	N/A	N/A
SC1/005	0.3	Sunbury Cross Ex Services Association Club Crossways, TW16 7BB	URBAN, PDL			Full planning permission on site	Yes	Low	Potential at surface	0.88	99.12	0	0	None	6	0	0	5	N/A	N/A
SC1/008	0.03	Adj. 2 Spelthorne Grove, TW16 7BZ	URBAN, GF			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled.	Yes	Medium	Potential at surface	0	100	0	0	None	0	0	0	3	N/A	N/A

						Modelling does not show site at risk during 1% AEP incl. climate change. Site included within larger allocation SC1/021														
SC1/013	0.25	RMG Warehouse & Delivery Office, 47-79 Staines Road West, TW16 7AA	URBAN, PDL	Year 11-15	22	Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Medium in local area.	Potential at surface	0	100	0	0	None	6	0	0	3	N/A	N/A
SC1/014	0.23	r/o 2-32 Escot Road/ Spelthorne Grove, TW16 7BZ	URBAN, GF			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Site included within larger allocation SC1/021	Yes	Medium in local area.	Potential at surface	35.96	64.04	0	0	None	0	0	0	3	N/A	N/A
SC1/016	0.02	RO Grandera House, 61-73 Staines Road West, TW16 7FE	URBAN, PDL			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Medium in local area.	Potential at surface	0	100	0	0	None	6	0	0	4	N/A	N/A
SC1/017	0.04	59 Staines Road West, TW16 7AG	URBAN, PDL			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Not suitable for development & below site size threshold (overdevelopment)	Yes	Medium in local area.	Potential at surface	0	100	0	0	None	6	0	0	3	N/A	N/A
SC1/019	0.23	Sunbury Social Services Centre 108 Vicarage Road, TW16 7QL	URBAN, PDL	Year 11-15	11	Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Low	Potential at surface	93.7	6.3	0	0	None	0	0	0	5	N/A	N/A
SC1/020	0.33	Crownage Court, 99 Staines Road West, TW16 7FG	URBAN, PDL			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Brownfield Tier 2 – site included within SLAA but allocation not required.	Yes	Medium in local area.	Potential at surface	0	100	0	0	None	6	0	0	4	N/A	N/A
SC1/021	2.1	Land at Spelthorne Grove Spelthorne Grove, TW16 7BZ	URBAN, PDL	Year 11-15	250	Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Medium	Potential at surface	6.32	93.68	0	0	None	6	0	0	4	N/A	N/A
SE1/001	0.05	Park House, 17-19 Park Road, TW16 5BX	URBAN, PDL			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Included in PDO windfall allowance	Yes	Medium to High on access.	Potential at surface	0	100	0	0	None	0	0	0	1	N/A	N/A
SE1/002	0.12	Former Police Station, 69 Staines Road East, TW16 5AA	URBAN, PDL			Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Development implemented.	Yes	Medium	Potential at surface	68.48	31.52	0	0	None	6	0	0	3	N/A	N/A
SE1/003	0.75	77 Staines Road East, TW16 5AD	URBAN, PDL	Year 11-15	75	Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Medium in local area.	Potential at surface	2.51	97.49	0	0	None	6	0	0	4	N/A	N/A

SE1/004	0.1	12 Park Road, TW16 5BU	URBAN, PDL		Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Brownfield Tier 2 – site included within SLAA but allocation not required.	Yes	Medium/High in local area.	Potential at surface	0	100	0	0	None	0	0	0	0	N/A	N/A
SE1/014	2.29	Land to SE of Hanworth Road, TW16	GB, GF		Felthamhill Brook passes along north eastern edge. Moderately performing Green Belt and plays an important strategic role in separating Spelthorne from London.	Yes	Low	Potential at surface	18.27	81.73	0	0	None	0	0	0	1	N/A	N/A
SE1/015	93.59	Kempton Park Racecourse, Staines Road East, TW16 5AQ	GB, MIXED		Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Low	Potential at surface	72.44	27.56	0	0	06JanuaryNewYear2003	16	0	14	3	N/A	N/A
SE1/015a	6.24	Kempton Park (PDL) Staines Road East, TW16 5AQ	GB, MIXED		Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Strategically important Green Belt, negative transport impacts expected and concentration of development at odds with spatial strategy.	Yes	Low	Potential at surface	70.46	29.54	0	0	None	4	0	4	2	N/A	N/A
SE1/022	0.96	Units 3 and 4, The Summit Business Park, Hanworth Road, TW15 5DB	URBAN, PDL		Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium on site and access.	Potential at surface	0	100	0	0	None	6	0	0	3	N/A	N/A
SE1/023	0.06	41 Orchard Road, TW16 5BZ	URBAN, PDL		Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change. Brownfield Tier 2 – site included within SLAA but allocation not required.	Yes	Medium to High on access.	Potential at surface	0	100	0	0	None	0	0	0	2	N/A	N/A
SE1/024	0.97	Annandale House, 1 Hanworth Road, TW16 5DJ	URBAN, PDL	Year 1-5	295	Site in Flood Zone 2 on Flood Map for Planning, assumed from historical flood risk rather than modelled. Modelling does not show site at risk during 1% AEP incl. climate change.	Yes	Low on site. Medium in local area.	40.68	59.32	0	0	None	6	0	0	5	N/A	N/A

653 Units (Total 2,744)

Table 9 Sites at risk of flooding from rivers (Flood Zone 2 or 3), with access that is either dry or low hazard rating

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
HS1/004	2.31	Units 1 and 2, Longwood Business Park Fordbridge Road, TW16 6AZ	GB, PDL			Parts of site at Significant hazard. Fordbridge to south in Flood Zone 3b (River Ash). Access issues due to flood risk and not considered to be sustainably located.	No access along Fordbridge, but dry access to north along Halliford Road.	Low to medium.	Potential at surface	44.08	47.73	4.82	3.37	06MarchSpring1947	20	2	42	0	1	0
HS1/007	4.76	Land at Fordbridge Road Fordbridge Road, TW16 6DW	GB, GF			North of site at Moderate and Significant hazard. Access possible along Halliford Road to west and then north. Site is within a strategically important swathe of Green Belt which is strongly performing in Stage 1 and Stage 2 of the Green Belt Assessment.	Yes	Low	Potential at surface	99.59	0.41	0	0	EA06Winter13-14	18	2	38	0	1	0
HS1/013	46.99	Sunbury Golf Course Charlton Lane, TW17 8QA	GB, GF			Southern edge of site in River Ash floodplain. Significant hazard rating. Strongly performing Green belt and large in size – at odds with spatial strategy.	Yes	Low	Potential at surface	70.78	25.93	1.79	1.5	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, 06NovemberAutumn1974, 06SeptemberAutumn1968, EA06Winter13-14	0	0	2	3	0	3
HS2/003	2.09	Land North of Nursery Road Nursery Road, TW16 6LX	GB, GF			Site availability not confirmed	Yes	Low	Potential at surface	58	42	0	0	None	0	0	0	1	1	0
LS1/005	10.39	Land east of Charlton Road Charlton Road,	GB, GF			Area to south at risk, significant hazard. Below site size threshold	Yes	Low. Waterbody on site.	Potential at surface	0	100	0	0	06JanuaryNewYear2003, EA06Winter13-14	0	0	2	2	4	7
LS1/007	5.1	Land to South of Ashford Common Water Treatment Works Charlton Road, TW17 0SH	GB, GF			Close proximity to SNCI nature designation – negative environmental impacts identified.	Yes	Medium	Potential at surface	8	92	0	0	EA06Winter13-14	0	0	2	2	4	7

					Moderate Green Belt performance.														
LS1/018	7.65	Land around Manor Farm (south/east of Charlton Road) Charlton Road, TW17 ORJ	GB, MIXED		Area to south at risk, significant hazard. Strategic Green Belt. Limited sustainability of location.	Yes	Low/Medium	Potential at surface	0	100	0	0	06JanuaryNewYear2003, EA06Winter13-14	0	0	2	2	4	7
LS1/019	0.33	Land west Charlton Lane Charlton Lane, TW17 ORJ	GB, GF		Significant hazard. The site is strongly performing Green Belt, particularly regarding purpose 2 and makes a fundamental contribution to the wider strategic Green Belt.	Yes	Low/Medium	Potential at surface	0	100	0	0	None	0	0	2	2	4	7
LS1/020	3.01	Land north of New Road/ Charlton Road Charlton Road, TW17 ORJ	GB, GF		Significant hazard. Green Belt greenfield site. Local importance and value of the site in landscape character and visual amenity terms, the site is considered to be somewhat at odds with the spatial strategy.	Yes	Medium	Potential at surface	0	100	0	0	06JanuaryNewYear2003, EA06Winter13-14	0	0	2	2	4	7
LS3/001	0.13	r/o 151-153 Charlton Road, TW17 ORL	URBAN, GF		Moderate / Low hazard. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium on access.	Potential at surface	53.53	46.47	0	0	None	0	0	2	1	4	7
LS3/002	0.02	Adj 84 Hetherington Road, TW17 0SW	URBAN, PDL		Below site size threshold	Yes	Medium on access.	Potential at surface	86	14	0	0	None	0	0	2	1	4	7
LS3/003	0.04	West of 86 Hetherington Road, TW17 1ST	URBAN, PDL		Below site size threshold	Yes	Medium on access.	Potential at surface	2	98	0	0	None	0	0	2	1	4	7
LS3/006	0.06	Adj 3 Millfield, TW16 7HL	URBAN, GF		Below site size threshold	Yes	Medium on site and access.	Potential at surface	47	53	0	0	None	0	0	0	1	N/A	N/A
RL1/007	6.52	Land off Worple Road Worple Road, TW18 1SB	GB, GF		Site at Low and Moderate hazard. Access dry and Low hazard during 1% AEP incl. CC. Large site, uneven distribution of development, Green Belt, negatively received at preferred options consultation –	Yes	Low	Potential at surface	42.62	57.38	0	0	None	26	6	38	3	2	6



SN2/002	0.11	Hope Inn Hithermoor Road, TW19 6AR	URBAN, PDL		Site not at risk from Colne during 0.1% AEP. Watercourse passes along edge of site. Small section of the access route shown to flood (low depth). Brownfield Tier 2 – site included within SLAA but allocation not required.	Yes	Medium / High on access routes	Potential at surface	76.76	7.67	15.47	0.1	06DecemberWinter2000, 06OctoberAutumn1993, 06OctoberAutumn2000	2	0	6	5	0
SN2/003	0.73	Land north of Horton Road, TW19 6BD	GB, GF		Site not at risk from Colne during 0.1% AEP, but part of one access route is at risk, low depths. Not considered to warrant taking forward due to Green Belt performance and relatively unsustainable location for an intensified use.	Yes	Medium in local area.	Potential at surface	97.82	2.18	0	0.01	06DecemberWinter2000, 06OctoberAutumn2000	0	0	6	2	0
SN2/005	5.33	Hithermoor Farm 2 Farm Way, TW19 6AY	GB, GF		Portion of site at risk from Colne during 0.1% AEP. Unsustainable location and negative Sustainability Appraisal impact on environment.	Yes	Medium / High in local area.	Potential at surface	69.57	5.95	23.83	0.65	06DecemberWinter2000, 06JanuaryNewYear2003, 06OctoberAutumn1993, 06OctoberAutumn2000, EA06Winter13-14	2	0	6	5	0
SN2/006	0.45	Kestrel Horton Road, TW19 6AE	GB, PDL		Site not at risk of flooding from Colne during 0.1% AEP. Noise issues and moderately performing Green Belt & strategically important.	Yes	Medium on access routes.	Potential at surface	96.52	2.4	1.07	0	None	2	0	6	5	0
SN2/007	1.06	Former Nursery Site, Rear of 37-51 Hithermoor Road, TW19 6AF	GB, MIXED		Site not at risk from Colne during 0.1% AEP. Watercourse passes along edge of site. Small section of the access route shown to flood (low depth). Employment use promoted – at odds with spatial strategy on Green Belt site. Potential	Yes	Medium / High on access routes	Potential at surface	99.45	0.01	0.54	0	06DecemberWinter2000, 06OctoberAutumn1993, 06OctoberAutumn2000	2	0	6	5	0



ST1/016	2.59	Land at Birch Green/ Staines Pumping Station (Site C) London Road, TW18	GB, GF			Site and access routes at low hazard. Moderately performing Green Belt and strategically important function.	Yes	Low	Potential at surface	37.48	29.31	26.65	6.06	06JanuaryNewYear2003, 06MarchSpring1947, 06NovemberAutumn1974, EA06Winter13-14	10	0	10	0	N/A
ST1/025	1.03	17-51 London Road, TW18 4EX	URBAN, PDL			Site at Moderate hazard. Access dry. Site has full planning permission – under construction.	Yes	Medium/High	Not prone	1.1	98.9	0	0	06MarchSpring1947, EA06Winter13-14	26	0	28	1	N/A
ST1/031	0.26	<b>Thameside Arts Centre Wyatt Road, TW18 2AY</b>	<b>URBAN , PDL</b>	<b>Year 11- 15</b>	<b>19</b>	<b>Site low hazard. Access possible at Low Hazard.</b>	<b>Yes</b>	<b>Medium</b>	<b>Potential at surface</b>	<b>0.26</b>	<b>99.74</b>	<b>0</b>	<b>0</b>	<b>06MarchSpring1947</b>	<b>34</b>	<b>2</b>	<b>44</b>	<b>2</b>	<b>2</b>
ST1/035	0.11	44A Gresham Road, TW18 4AN	URBAN, PDL			Sweeps Ditch adjacent to the site. Low hazard on site. Dry access. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. High in local area.	Potential at surface	0	0	87.33	12.67	06MarchSpring1947	34	2	48	1	2
ST1/036	0.08	Universal Tyre Co Ltd Laleham Road, TW18 2DY	URBAN, PDL			Moderate hazard on site. Low hazard on access route. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low on site. High in local area.	Potential at surface	0	100	0	0	06MarchSpring1947	30	2	32	1	2
ST1/040	0.51	Viewpoint, 240 London Road, TW18 4JJ	URBAN, PDL			Moderate risk on site. Access dry. Site with planning permission – under construction.	Yes	Low. Waterbody adjacent to site.	Not prone	59	41	0	0	06MarchSpring1947, EA06Winter13-14	24	0	26	0	N/A
ST2/008	0.34	Staines Tinware Langley Road, TW18 2EJ	URBAN, PDL			Site Low /Moderate hazard. Access possible at Low Hazard. Site with planning permission.	Yes	Medium	Potential at surface	7.65	92.35	0	0	None	30	2	32	1	2
ST2/027	0.05	85A Laleham Road, TW18 2EA	URBAN, PDL			Site Low hazard. Access possible at Low Hazard. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Medium	Potential at surface	0	100	0	0	None	30	4	38	1	2
ST3/002	0.22	Florida Court Station Approach, TW18 4LZ	URBAN, PDL			Site not at risk during 1% AEP incl. CC. Access at Low hazard.	Yes	Medium - High in local area.	Not prone	100	0	0	0	None	46	0	48	1	N/A

						Brownfield Tier 2 – site included within SLAA, but allocation not required.													
ST3/004	0.92	34-36 (OAST House) /Car park Kingston Road, TW18 4LN	URBAN , PDL	Year 1-5	180	Access is at Low hazard for the 1% AEP incl. CC	Yes	Medium - High in local area.	Not prone	94.41	5.59	0	0	None	48	0	42	1	N/A
ST3/005	0.33	7-17 Kingston Road, TW18 4LH	URBAN, PDL			Site low hazard. Access low hazard. Site not available.	Yes	Low	Not prone	37.26	62.74	0	0	None	40	0	28	1	N/A
ST3/006	0.86	Renshaw Trading Estate Mill Mead, TW18 4UQ	URBAN, PDL			Site Low and Moderate hazard. Access Low hazard. Full planning permission on site	Yes	High / Medium	Potential at surface	0	99.69	0.31	0	06MarchSpring1947	16	0	24	2	N/A
ST3/007	0.07	140-154 High Street, TW19 4AB	URBAN, PDL			Site and access at Low hazard. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Not prone	60.71	39.29	0	0	None	24	0	24	1	N/A
ST3/010	0.02	15 London Road, TW18 4AJ	URBAN, PDL			Site not a risk during 1% AEP incl. CC. Access at Low hazard. Site included with St1/025.	Yes	Low. Medium in surrounding area.	Not prone	89.63	10.37	0	0	None	22	0	28	1	N/A
ST3/012	0.59	Staines Telephone Exchange Fairfield Avenue, TW18 4AB	URBAN , PDL	Year 11-15	180	Site at Low and Moderate hazard. Access low hazard.	Yes	Medium	Potential at surface	0	80.15	19.85	0	06MarchSpring1947	8	0	20	2	N/A
ST3/014	1.25	Birch House/London Road, Fairfield Avenue, TW18 4AB	URBAN , PDL	Year 6-10	400	Site low hazard. Access low hazard.	Yes	Low	Not prone	34.3	65.7	0	0	06MarchSpring1947	26	0	34	2	N/A
ST3/015	0.03	153-155 High Street, TW18 4PA	URBAN, PDL			Site and access at Low hazard. Brownfield Tier 2 – site included within SLAA, but allocation not required.	Yes	Low. Medium in surrounding area.	Not prone	65.39	34.61	0	0	None	22	0	30	1	N/A
ST3/016	0.13	Claydon Court Kingston Road, TW18 4NG	URBAN, PDL			Edge of site and access at Low hazard. Full planning permission on site	Yes	Medium - High in local area.	Not prone	53.68	46.32	0	0	06MarchSpring1947	46	0	34	1	N/A
ST3/019	0.17	Elizabeth House, 56-60 London Road, TW18 4HB	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Full planning permission on site	Yes	Medium along access routes.	Not prone	11.59	88.41	0	0	None	30	0	22	1	N/A
ST3/020	0.3	Magna House, 18-32 London Road, TW18 4BP	URBAN, PDL			Site and access not at risk during 1% AEP incl. CC. Full planning permission on site	Yes	Medium along access routes.	Not prone	60.52	39.48	0	0	06MarchSpring1947	36	0	28	1	N/A

831 Units (Total 3,800)

Table 10 Sites wholly in Flood Zone 3, with access at low hazard

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
AT1/012	0.47	Ashford Community Centre Woodthorpe Road, TW15 3NJ	GB, PDL	Year 1-5	32	Site at Moderate hazard, edge at Significant hazard. Adjacent to River Ash. Access OK.	Yes	Low	Potential at surface	0	4.36	94.98	0.65	06MarchSpring1947, ea06FebruaryWinter2014, EA06Winter13-14	0	0	0	2	N/A	N/A
RL1/001	0.13	Staines Ex Servicemen Club, 6 Laleham Road, TW18 2DX	URBAN, PDL			Adjacent to Thames. Moderate / Significant hazard on site. Access at low hazard and dry. Full planning permission on site.	Yes	High in local area.	Potential at surface	0	61.44	30.93	7.63	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, EA06Winter13-14	30	2	34	1	2	9

32 Units (Total 3,832)

Table 11 Sites in Flood Zone 3, with pedestrian access at low hazard

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
ST1/037	0.24	Thameside House South Street, TW18 4PR	URBAN, PDL	Year 1-5	140		Pedestrian access at low hazard.	Low	Potential at surface	73.85	20.29	5.54	0.32	None	38	2	48	1	N/A	N/A
ST4/009	5.15	The Elmsleigh Centre and adjoining land South Street, TW18 4QF	PDL, URBAN	Year 11-15	850		Pedestrian access at low hazard.	Medium / High	Potential at surface	25.35	9.32	65.33	0	06MarchSpring1947	32	0	50	2	N/A	N/A

990 Units (Total 4,822)

Table 12 Sites primarily in Flood Zone 1 and 2 with no access that is either dry or low hazard

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
LS2/005	0.05	Between 27+29 Mandeville Road, TW17	URBAN, PDL			Flood Zone 2. Moderate hazard with climate change. Below site size threshold.	No	Medium	Limited potential	5.36	94.64	0	0	None	0	0	4	2	4	7
LS2/006	0.05	Garages Greeno Road, TW18	URBAN, PDL			Flood Zone 2. Access at Significant hazard. Below site size threshold.	No	Low on site. High on access.	Limited potential	0	100	0	0	06MarchSpring1947, 06SeptemberAutumn1968	0	0	4	3	4	7
LS2/007	0.11	55 Squire's Bridge Road, TW17 0JZ	URBAN, PDL			Significant Below site size threshold.	No	Medium	Potential at surface	0	100	0	0	None	0	0	0	2	4	7
LS3/009	0.19	Osmanstead Condor Road, TW18 1UG	URBAN, PDL			Site not at risk, but no dry or low hazard access. Below site size threshold.	No	Low on site. Medium in local area.	Potential at surface	80.67	19.33	0	0	06MarchSpring1947, 06SeptemberAutumn1968	2	6	12	2	2	6
RL1/002	0.06	Works, 20 Ruskin Road, TW18 2PX	URBAN, PDL			Site at Significant hazard. Ruskin Road at Significant hazard. Further access routes to south and east at Significant hazard. Access north along Laleham Road and then Gresham Road, Kingston Road is at low hazard. Planning permission on site.	No	High	Potential at surface	0	6.59	93.41	0	None	58	8	54	4	2	9
RL1/003	0.13	N of (r/o 75,77 Penton Road) St Olave's Close, TW18 2LB	GB, GF			Site at Low and Moderate hazard. Access at Significant hazard. Below site size threshold.	No	Low on site. High in local area.	Potential at surface	48	52	0	0	None	42	14	56	3	2	9
RL1/004	0.12	S of (r/o 119-121 Penton Rd) St Olave's Close, TW18 2LB	GB, GF			Site at Low and Moderate hazard. Access at Significant hazard. Below site size threshold.	No	Low on site. High in local area.	Potential at surface	71.72	28.28	0	0	06MarchSpring1947	42	14	50	2	2	9
RL1/010	4.09	Playing fields Berrycroft Road and Bingham Drive,	GB, GF			Site at Moderate and Significant hazard. Green Belt. Loss of open space.	No	Medium	Potential at surface	1.65	98.35	0	0	None	2	0	2	0	2	6
SH1/001	0.11	The Anchor Hotel Church Square, TW17 9JY	URBAN, PDL			Site on a dry island surrounded by areas of Significant hazard. Dry island and no means of escape. Not suitable	No	Low	Potential at surface	99.96	0.04	0	0	None	6	0	32	1	2	4
SH1/006	0.04	6 Green Lane, TW17 8DW	URBAN, PDL			Site at low risk but access at Significant hazard. Below site size threshold.	No	Medium in local area.	Not prone	10.23	89.77	0	0	None	0	0	0	2	0	3
SH1/010	0.11	Shepperton Library High Street, TW17 9AU	URBAN, PDL	Year 6-10	10	Site doesn't flood. But access at risk.	No	Low	Not prone	100	0	0	0	None	2	0	12	2	2	4
SH1/015	0.31	Shepperton Youth Centre Laleham Road, TW17 8EJ	URBAN, PDL	Year 11-15	25	Site at Moderate hazard. Access at Moderate and Significant hazard.	No	Medium	Limited potential	3.6	96.4	0	0	None	0	0	4	3	0	3
SH2/001	0.13	Land at Station Road, TW17 8AU	URBAN, GF			Site and access at Significant hazard. TPO designation – site unsuitable.	No	High	Not prone	7.16	92.84	0	0	None	0	0	0	2	0	3
SH2/003	0.17	Shepperton Delivery Office, 47 High Street, TW17 9AA	URBAN, PDL	Year 11-15	10	Site doesn't flood. But access at risk.	No	Low	Potential at surface	100	0	0	0	None	2	0	12	2	2	4
SH2/004	0.03	96-98 High Street, TW17 9BB	URBAN, PDL			Site doesn't flood. But access at risk. Brownfield Tier 2 – site included within SLAA, but allocation not required.	No	Low	Potential at surface	100	0	0	0	None	8	0	24	3	2	4
SH2/005	0.19	Shepperton House, 2-4 Green Lane,	URBAN, PDL			Site doesn't flood. But access at risk. Planning permission on site.	No	Medium in local area.	Not prone	90.78	9.22	0	0	None	0	0	12	2	2	7
SH3/005	0.13	Walton Bridge Garage Walton Bridge Road, TW17 8LX	URBAN, PDL			Site doesn't flood. But access at Significant hazard.	No	Low	Potential at surface	0	52.55	47.45	0	06MarchSpring1947, 06SeptemberAutumn1968	20	6	48	0	0	3



Table 13 Sites in Flood Zone 3, with no access that is either dry or low hazard

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
LS1/001	0.07	Linton Place New Road, TW17 OQG	GB, PDL			Significant hazard. Strongly performing Green Belt.	No	Low	Potential at surface	0	99.12	0.88	0	None	0	0	0	0	4	7
LS1/002	47.88	Land off Shepperton Road Shepperton Road, TW17	GB, GF			Significant hazard. Moderately performing Green Belt. Promoted for economic uses – at odds with spatial strategy.	No	Medium. Drainage ditches present on site.	Potential at surface	30	56.44	8.91	4.65	06JanuaryNewYear2003, 06MarchSpring1947, 06SeptemberAutumn1968, EA06Winter13-14	2	6	24	2	6	13
LS1/008	1.64	Staines Road Farm (Southern Site) Laleham Road, TW17 OAH	GB, GF			Significant hazard. Strongly performing Green Belt.	No	Medium to High	Potential at surface	6.02	93.98	0	0	06JanuaryNewYear2003	0	0	4	2	4	7
LS1/015	37.06	Staines Road Farm (Main Site) Laleham Road, TW17 OAH	GB, GF			Significant hazard. Strongly performing Green Belt and strategically important.	No	Low	Potential at surface	47.34	42.98	8.45	1.23	06JanuaryNewYear2003, 06MarchSpring1947, 06NovemberAutumn1974, 06SeptemberAutumn1968, EA06Winter13-14	0	0	6	5	4	7
LS1/016	24.96	Land North of B376 Shepperton Road, TW18 1RU	GB, GF			Significant hazard. Strongly performing Green Belt and strategically important.	No	Medium	Potential at surface	34.25	63.32	2.43	0	06JanuaryNewYear2003, EA06Winter13-14	4	6	14	2	6	13
LS2/001	59.85	Shepperton Studios, Studios Road, TW17 OQD	GB, MIXED			Significant - Extreme hazard. R. Ash passes through site. Employment use – at odds with spatial strategy (Green Belt)	No	Medium	Potential at surface	23.49	60.27	8.11	8.14	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, 06NovemberAutumn1974, 06SeptemberAutumn1968, EA06Winter13-14	0	0	8	2	6	13
LS2/002	0.1	10 Squire's Road, TW17 0LQ	URBAN, PDL			Significant hazard. Below site size threshold.	No	High/Medium	Not prone	0	100	0	0	None	0	0	4	2	4	7
LS2/003	0.05	Hall Adj. 68 Wood Road, TW17 ODX	URBAN, PDL			Significant hazard on part of site. Below site size threshold.	No	Low on site. Medium / High on access.	Not prone	13	87	0	0	None	0	0	4	1	4	7
LS2/004	0.09	The Bull, 152 Laleham Road, TW17 ODB	URBAN, PDL			Significant hazard. Site not available.	No	Medium	Limited potential	0	100	0	0	None	0	0	4	2	4	7
LS2/009	0.73	Littleton Cottages, 1-12 New Road, TW17 0QQ	GB, MIXED			Significant. Green Belt and flood risk.	No	Low	Potential at surface	0	69.55	30.45	0	None	0	0	0	0	4	7
LS2/010	0.23	Land North of New Road New Road, TW17 0QQ	GB, GF			Significant Green Belt and flood risk.	No	Low	Potential at surface	0	33.49	66.51	0	EA06Winter13-14	0	0	2	1	4	7
RL1/005	0.33	161-162 Thames Side, pt Arcadia Caravan site and 15 Riverway, TW18 2SJ	URBAN, PDL			Site at Low and Moderate hazard. Access at Moderate hazard. Site not available.	No	Low on site. Medium in local area.	Potential at surface	0	98.47	1.53	0	06FebruaryWinter1990, 06JanuaryNewYear2003, 06MarchSpring1947, 06SeptemberAutumn1968	2	2	16	0	2	9
RL1/006	0.17	43-44 Thames side, TW18 2HD	URBAN, PDL			Site at Moderate/Significant hazard. Access at Significant hazard. Site not available.	No	Low on site. High in local area.	Potential at surface	0	11.14	88.04	0.82	06MarchSpring1947	40	14	50	2	2	9

RL1/008	7.53	Land to Rear of Ashford Road Ashford Road, TW18 1SB	GB, GF			Site at Moderate and Significant hazard. Strongly performing Green Belt and strategically important.	No	Low on site. Medium in local area.	Potential at surface	1.27	98.73	0	0	06JanuaryNewYear2003, EA06Winter13-14	2	0	2	0	2	6
RL1/009	4.08	Waterside Nursery Limited Staines Road, TW18 2ST	GB, GF			Site at Moderate and Significant hazard. Strongly performing Green Belt and strategically important.	No	Low on site. Medium in local area.	Potential at surface	1.63	21.19	77.06	0.12	06JanuaryNewYear2003	4	2	12	1	2	15
SE1/013	0.04	Dart House Thames Street, TW16 6AG	URBAN, PDL			Site and access at Significant hazard. Planning permission on site.	No	Low	Potential at surface	0	27.68	44.95	27.37	06MarchSpring1947, 06NovemberAutumn1974, EA06Winter13-14	14	0	24	1	1	0
SH1/005	4.96	Staines Road Farm (Eastern Site) Laleham Road, TW17 8	GB, GF			Significant hazard on site and access. Green Belt – large site at odds with spatial strategy of smaller sites. Flood risk.	No	Low/Medium.	Potential at surface	5.09	40.82	54.09	0	06JanuaryNewYear2003, 06MarchSpring1947	0	0	4	4	0	3
SH1/018	4.45	SUEZ Depot, Riverscroft Chertsey Road, TW17 9NY	GB, GF			Significant hazard on site. Extreme and Significant on access routes. Flood risk.	No	Low	Limited potential	0	86.8	13.2	0	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, 06SeptemberAutumn1968, EA06Winter13-14	10	6	46	0	2	4
SH3/004	0.21	Shepperton Autoway Walton Bridge Road, TW17 8NE	URBAN, PDL			Site and access at Significant hazard. Site not available.	No	Medium in local area.	Potential at surface	0	0	100	0	None	8	2	26	0	0	3
SH3/006	0.12	Shepperton Service Station Walton Bridge Road, TW17 8NE	URBAN, PDL			Site and access at Significant hazard. Site not available.	No	Medium in local area.	Potential at surface	0	0	100	0	None	6	0	42	0	0	3
SS3/002	0.38	152-154 Commercial Road, TW18 2QP	URBAN, PDL			Site and access at Significant hazard. Flood Risk – issues with safe access/egress.	No	Medium on local access routes.	Potential at surface	0	0	99.58	0.42	06MarchSpring1947, EA06Winter13-14	34	8	44	4	2	9
ST1/012	0.33	Masonic Hall and Old Telephone Exchange site Elmsleigh Road, TW18 4PN	URBAN, PDL			Site and access route at Significant hazard. Site with full planning permission.	No	Medium/High	Potential at surface	0	0.5	99.5	0	06MarchSpring1947	20	0	26	2	N/A	N/A
ST1/014	6.77	Thames Water Training Centre Coppermill Road, TW19 5NX	GB, PDL			Site not at risk during 0.1%AEP, but access routes in wider area at risk. Watercourse along west of site. Site designated SNCI – important nature conservation role.	No	Medium in local area.	Potential at surface	0	5.89	23.88	70.23	06JanuaryNewYear2003, 06MarchSpring1947, EA06Winter13-14	0	0	0	0	N/A	N/A
ST1/028	0.15	Leacroft Centre Leacroft, TW18 4PB	URBAN, PDL	Year 6-10	17	Site Moderate hazard. Access Significant hazard.	No	Medium in local area.	Not prone	0	15.69	84.31	0	06MarchSpring1947	30	0	26	1	N/A	N/A
ST4/003	0.24	Hanover House Bridge Street, TW18 4TB	URBAN, PDL			Site and access at Moderate and Significant hazard. Included within ST4/002.	No	Medium - High in local area.	Potential at surface	0	27.18	70.45	2.37	06JanuaryNewYear2003, 06MarchSpring1947, EA06Winter13-14	6	0	14	2	N/A	N/A
ST4/005	0.02	20 Bridge Street, TW18 4TW	URBAN, PDL			Site and access at Moderate and Significant hazard. Site has full planning permission.	No	Medium in local area.	Potential at surface	45.62	5.32	49.06	0	None	6	0	16	2	N/A	N/A
ST4/010	0.25	Riverside Surface Carpark Thames Street, TW18 4UD	URBAN, PDL	Year 6-10	35	Access route has Moderate and Significant hazard	No	Medium - High in local area.	Potential at surface	0	0	100	0	06MarchSpring1947	22	0	26	2	N/A	N/A



Table 14 Sites partially within Flood Zone 3b

Site ID	Area (HA)	Full Address	Land Type	Local Plan Year	Units	Notes	Access availability	ROFSW (using Low category as a proxy for the impact of CC)	BGS Susceptibility	Proportion of Site within Flood Zone 1	Proportion of Site within Flood Zone 2	Proportion of Site within Flood Zone 3a	Proportion of Site within Flood Zone 3b	Site intersects extent of a Recorded flood outline	Number of Internal Property Flood records within 500m of the site	Number of External Property Flood records within 500m of the site	Number of Historic Flood Incident records within 500m of the site	Number of Surrey CC Wetspot locations within 500m of the site	Total Internal Sewer Flood Records within Postcode Area	Total External Sewer Flood Records within Postcode Area
LS1/003	15.95	Land and Works off Littleton lane A Shepperton Road, TW18 1SJ	GB, GF			Significant and Extreme hazard. Flood Zone 3b. Moderately performing Green Belt and promoted for employment uses – at odds with spatial strategy.	No	Medium.	Potential at surface	0	46.1	3.56	50.34	06JanuaryNewYear2003, 06MarchSpring1947, 06SeptemberAutumn1968, EA06Winter13-14	14	6	60	1	6	13
LS1/004	0.55	Land off Staines Road, TW18 1SB	GB, GF			Significant hazard. Flood Zone 3b. Strongly performing Green Belt.	No	Medium.	Not prone	0	0.01	57.38	42.61	None	0	6	12	2	2	9
LS3/010	1.64	Manor Farm The Broadway, TW18 1SB	GB, MIXED			Within 3b. Significant hazard. Access at Significant hazard. Strongly performing Green Belt and promoted for employment uses – at odds with spatial strategy.	No	Low on site. Medium in local area.	Not prone	14.93	38.39	6.51	40.16	None	2	6	12	2	2	6
RL1/012	0.79	Land Adjacent to 3 Penton Hook Farm Penton Hook Road, TW18 2HU	GB, GF			Within 3b. Significant hazard. Access at Significant hazard. Green Belt and flood risk.	No	Low on site. Medium on access.	Potential at surface	0	36.43	39.67	23.89	06MarchSpring1947, 06SeptemberAutumn1968, EA06Winter13-14	22	2	42	1	2	9
SH1/003	1.98	Land off Littleton Lane B Littleton Lane, TW18 1SJ	GB, GF			Within 3b. Access at Significant hazard. Site discounted due to flood risk. Green Belt.	No	Low on site. Waterbodies either side of site.	Limited potential	0	16.97	13.61	69.42	06JanuaryNewYear2003, 06MarchSpring1947, 06SeptemberAutumn1968, EA06Winter13-14	20	6	62	1	4	8
SH1/004	1.97	Land off Thameside, Thameside, TW18 1SJ	GB, GF			Within 3b. Access at Significant hazard. Site discounted due to flood risk. Green Belt.	No	Low on site. Waterbodies next to site.	Limited potential	0	1.74	10	88.26	06JanuaryNewYear2003, 06MarchSpring1947, 06NovemberAutumn1974, 06SeptemberAutumn1968, EA06Winter13-14	20	6	62	1	0	1
SH1/016	1.73	Land North of Renfree Way Renfree Way, TW17 0AN	GB, GF			Within 3b. Significant hazard. Access at Significant hazard. Green Belt.	No	Low	Potential at surface	0	16.4	9	74.59	06DecemberWinter2000, 06MarchSpring1947, 06SeptemberAutumn1968	6	0	32	2	2	4
SH1/017	2.81	The Hamiltons Sheepwalk, TW17 8QA	GB, GF			Partially within 3b. Significant hazard. Green Belt.	No	Low/Medium	Limited potential	0	51.58	37.02	11.4	06JanuaryNewYear2003, 06MarchSpring1947, 06SeptemberAutumn1968, EA06Winter13-14	4	0	22	0	2	4
SN1/009	5.26	Land at Poyle Meadows Horton Road, SL3 0AT	GB, GF			Within 3b from Colne. Site at risk. Access OK. SSSI designation. Green Belt.	Yes	Medium in local area.	Potential at surface	0.21	20.17	10.98	68.64	06JanuaryNewYear2003	0	0	0	0	0	0
ST1/013	2.58	Land at Vicarage Road Wraysbury Road, TW18	GB, GF			Within 3b. Site and access at Significant hazard. Site discounted due to flood risk. Green Belt.	No	Medium in local area.	Potential at surface	26.88	12.19	5.24	55.69	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, 06NovemberAutumn1974, EA06Winter13-14	6	0	8	2	N/A	N/A
ST1/015	0.47	Land at Birch Green/ Staines Pumping Station (Site B) London Road, TW18	GB, GF			Within 3b. Significant hazard on site. Access low hazard. Strategically important Green Belt.	Yes	Medium on site and in local area.	Not prone	0	2.61	28.36	69.02	06JanuaryNewYear2003, 06MarchSpring1947, EA06Winter13-14	24	0	20	1	N/A	N/A
<b>ST1/029</b>	<b>0.47</b>	<b>Surrey CC Buildings</b>	<b>URBAN, PDL</b>	<b>Year 6-10</b>	<b>30</b>	<b>3b</b>	<b>No</b>	<b>Medium</b>	<b>Potential at surface</b>	<b>0</b>	<b>10.69</b>	<b>28.58</b>	<b>60.74</b>	<b>06MarchSpring1947</b>	<b>42</b>	<b>8</b>	<b>54</b>	<b>3</b>	<b>2</b>	<b>15</b>

		Burges Way, TW18 1FA																		
ST1/030	0.66	Fairways Day Centre Knowle Green, TW18 1AJ	URBAN, PDL	Year 6-10	30	3b	No	Medium - High in local area.	Potential at surface	0	4.11	14.63	81.27	06MarchSpring1947, EA06Winter13-14	66	2	62	4	2	15
ST2/029	0.11	Cadline House Drake Avenue, TW18 2AP	URBAN, PDL			Partially within 3b. Low hazard. Access OK. Full planning permission on site.	Yes	Medium - High in local area.	Potential at surface	0	56.3	28.97	14.72	06MarchSpring1947	36	0	50	1	2	9
ST2/030	0.3	Vivienne House Budebury Road, TW18 2BB	URBAN, PDL			Partially within 3b (Sweeps Ditch). Moderate hazard. Access at low hazard. Full planning permission on site.	Yes	Medium - High in local area.	Potential at surface	0	54.84	7.61	37.55	06MarchSpring1947, EA06Winter13-14	44	2	56	3	2	15
ST4/002	0.9	Car Park, Hanover House & Sea Cadet Building Bridge Street, TW18 4TG	URBAN, PDL	Year 1-5	158	3b	No	High	Potential at surface	1.24	9.81	40.73	48.22	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, EA06Winter13-14	6	0	16	2	N/A	N/A
ST4/007	0.05	25-27 Clarence Street, TW18 4SY	URBAN, PDL			Partially within 3b. Significant hazard. Access route at Moderate / Significant hazard. Full planning permission on site.	No	Medium in local area.	Potential at surface	27.31	14.52	36.11	22.07	06MarchSpring1947, EA06Winter13-14	10	0	22	2	N/A	N/A
ST4/011	0.36	Thames Lodge Thames Street, TW18 4SJ	URBAN, PDL	Year 6-10	40	3b	No	High	Potential at surface	0	0.48	70.47	29.06	06DecemberWinter2000, 06JanuaryNewYear2003, 06MarchSpring1947, EA06Winter13-14	32	2	30	1	N/A	N/A

258 Units (Total 6,381)

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### 3. Exception Test

- 3.1 Sites identified as being within Flood Zones 3 have been considered as the least sequentially preferable in terms of flood risk. However, it has been identified that there are no alternative sites at lower risk of flooding and therefore these sites pass the Sequential Test.
- 3.2 In accordance with Table 2 of the PPG (reproduced as Table 3 in this document), where more vulnerable (residential) development is proposed in Flood Zone 3, proposals will need to pass the Exception Test. This Test requires two additional elements to be satisfied (as set out in paragraph 170 of the NPPF) before allowing development to be allocated.
- 3.3 For the Exception Test to be satisfied, it must be demonstrated that:
- development will provide wider [sustainability benefits to the community that outweigh flood risk](#); and
  - the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 3.4 All the SLAA sites identified within the following tables have been carried forward to the application of the Exception Test (as described within the Spelthorne Level 2 SFRA)

- Table 9 Sites at risk of flooding from rivers (Flood Zone 2 or 3), with access that is either dry or low hazard rating
- Table 10 Sites wholly in Flood Zone 3, with access at low hazard
- Table 11 Sites in Flood Zone 3, with pedestrian access at low hazard
- Table 12 Sites primarily in Flood Zone 1 and 2 with no access that is either dry or low hazard
- Table 13 Sites in Flood Zone 3, with no access that is either dry or low hazard
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- Table 14 Sites partially within Flood Zone 3b

## Part 1: Wider sustainability benefits

3.5 The Planning Practice Guidance on Flood Risk and Coastal Change<sup>14</sup> provides further information:

*How can it be demonstrated that wider sustainability benefits to the community outweigh flood risk?*

*Local planning authorities need to set their own criteria for this assessment, having regard to the objectives of their Plan's Sustainability Appraisal framework, and provide advice which will enable applicants to provide relevant and proportionate evidence.*

*Examples of wider sustainability benefits to the community could include:*

- *The re-use of suitable brownfield land as part of a local regeneration scheme.*
- *An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure.*
- *The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding National Planning Policy Framework policy requirements for Sustainable Drainage Systems.*

*Identified sustainability benefits need to be balanced against any associated flood risks, informed by the site-specific flood risk assessment. The impacts of flood risk on social, economic and environmental factors should be considered. Where wider sustainability benefits are absent or where they are outweighed by flood risk, the Exception Test has not been satisfied and the site allocation in the plan should not be made or planning permission should be refused.*

3.6 The Local Plan SA Framework comprises 12 SA Objectives that have been derived from the policy context, baseline data and key sustainability issues and opportunities.

- Objective 1. To provide sufficient high-quality housing to enable people to live in a home suitable to their needs and which they can afford.
- Objective 2. To facilitate the improved health and well-being of the whole population and reduce inequalities.
- Objective 3. To increase resilience to; reduce the risk of; and minimise the harm from flooding.
- Objective 4. To reduce land contamination and protect soil quality and quantity.
- Objective 5. To reduce air and noise pollution 6. To conserve and enhance biodiversity, habitats and species.
- Objective 7. To conserve and enhance the historic environment, heritage assets and their settings.
- Objective 8. To protect, enhance and manage Borough's open space and landscape character.
- Objective 9. To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion.
- Objective 10. Maintain high levels of employment and economic growth which is inclusive and sustainable across the Borough.
- Objective 11. To limit the impact of Climate Change and promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy.
- Objective 12. To maintain and improve water quality and promote the efficient use of water.

<sup>14</sup> Paragraph: 036 Reference ID: 7-036-20220825 Revision date: 25 08 2022

- 3.7 The Officer Site Assessments Preferred Options Consultation and Draft Local Plan Allocations set out the Sustainability Appraisal of each site and its contribution to the Local Plan objectives. This is accompanied by commentary and detail on the site selection process. Table 15 provides a site level summary.
- 3.8 It can be concluded that overriding sustainability benefits to the Borough relate to a number of objectives, including:
- Housing – all sites tested have a positive or strong positive benefit in providing sufficient high quality housing, in line with SA Objective 1. The Local Plan strategy seeks to meet identified housing need, and all sites identified and passing the exception test are required to deliver that level of need. As shown by the Sequential Test, there are no alternative sites at lower risk of flooding.
  - Land and soil – the vast majority (bar 3 sites) have a positive or strong positive impact in reducing land contamination, and protecting soil quantity and quality. This informs the Local Plan strategy, which aims to prioritise previously developed land and avoid loss of the most versatile land.
  - Transport – all (except 2) sites have a positive or strong positive impact on promoting sustainable modes of travel, improving accessibility to public transport and reducing road congestion. Development sites in and around town centres are shown to have good access to public transport, contributing to the Local Plan's strategy that prioritises development in sustainable locations with sustainable and active travel links.
  - Economic development –the majority of sites (16 of 24 assessed) have potential for positive effects in terms of employment and economic growth that is both inclusive and sustainable. Development of sites are expected to bring wider regeneration benefits that will support the Borough's town centres and local economy.
- 3.9 The potential effect of a combination of multiple sustainability benefits on various sites should also be considered favourably with regard to sites meeting the Exception Test.

Table 15 Sites that require the Exception Test, scored against the SA objectives

Site ID	Area	Address	Units	Land Type	Notes	% site in Flood Zone 1	% site in Flood Zone 2	% site in Flood Zone 3a	% site in Flood Zone 3b	1. Housing	2. Health	3. Flood risk	4. Land and soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape	9. Transport	10. Economic development	11. Climate Change	12. Water	
Table 9																						
RL1/011	6.06	Land at Staines and Laleham Sports Club, Worple Road	52	GB, GF	Site at Low and Moderate hazard. Access dry and Low hazard during 1% AEP incl. CC.	19.35	80.65	0	0	+	+	-	-	-	0	0	0	0	+	0	-	
ST1/031	0.26	Thameside Arts Centre, Wyatt Road	19	URBAN, PDL	Site low hazard. Access possible at Low Hazard.	0.26	99.74	0	0	++	+	-	+	0	0	-	0	+	+	0	-	
ST3/004	0.92	34-36 (OAST House) /Car park, Kingston Road	180	URBAN, PDL	Access is at Low hazard for the 1% AEP incl. CC.	94.41	5.59	0	0	++	+	-	++	-	0	-	0	++	+	0	-	
ST3/012	0.59	Staines Telephone Exchange, Fairfield Avenue	180	URBAN, PDL	Site at Low and Moderate hazard. Access low hazard.	0	80.15	19.85	0	++	0	-	+	0	0	0	0	0	++	-	0	-
ST3/014	1.25	Birch House/London Road, Fairfield Avenue	400	URBAN, PDL	Site low hazard. Access low hazard.	34	65.7	0	0	++	0	-	+	-	-	-	0	++	-	0	-	
Table 10																						
AT1/012	0.47	Ashford Community Centre, Woodthorpe Road	32	GB, PDL	Site at Moderate hazard, edge at Significant hazard. Adjacent to River Ash. Access OK.	0	4.36	94.98	0.65	++	+	-	0	-	0	0	0	+	+	-	-	
Table 11																						
ST1/037	1.26	Thameside House, South Street	140	URBAN, PDL	Risk on site varies. Northern part at low risk. But vehicular access is at Moderate and Significant hazard. Pedestrian access low hazard.	73.85	20.29	5.54	0.32	++	0	-	++	-	0	0	0	++	+	0	-	
ST4/009	5.13	The Elmsleigh Centre and adjoining land, South Street	850	PDL, URBAN	Vehicular access route has Moderate and Significant hazard during 1% AEP incl. CC. Pedestrian access low hazard.	25.35	9.32	65.33	0	++	0	-	++	0	0	0	0	++	+	0	-	
Table 12																						
SH1/010	0.11	Shepperton Library, High Street	10	URBAN, PDL	Site doesn't flood. But access at risk.	100	0	0	0	++	+	0	+	0	0	0	0	+	+	0	-	
SH1/015	0.31	Shepperton Youth Centre, Laleham Road	25	URBAN, PDL	Site at Moderate hazard. Access at Moderate and Significant hazard.	3.6	96.4	0	0	++	+	0	+	0	0	0	0	+	+	0	-	
SH2/003	0.17	Shepperton Delivery Office, 47, High Street	10	URBAN, PDL	Site doesn't flood. But access at risk.	100	0	0	0	++	+	0	+	0	0	0	0	+	+	0	-	
ST4/004	0.88	96-104, Church Street	100	URBAN, PDL	Access route has Moderate and Significant hazard during 1% AEP incl. CC	28.52	71.47	0.02	0	+	+	-	+	-	0	-	0	++	-	0	-	
ST4/019	0.24	Debenhams site, 35-45, High Street	150	URBAN, PDL	Site low risk but access at Moderate hazard during 1% AEP incl. CC.	86.64	12.79	0.57	0	++	0	-	++	-	0	-	0	++	+	0	-	
ST4/023	2.29	Two Rivers Retail Park Terrace, Mustard Mill Road	750	URBAN, PDL	Site not at risk during 1% AEP incl. CC, but Access is at risk.	79.7	20.24	0	0.06	++	0	-	++	-	0	-	0	++	-	0	-	
ST4/024	0.24	Frankie & Benny's/Travelodge, Two Rivers, Hale Street	55	URBAN, PDL	Site not at risk during 1% AEP incl. CC, but Access is at risk.	2.12	97.74	0.04	0.1	+	+	-	+	-	0	-	0	++	-	0	-	

ST4/025	0.92	Land at Coppermill Road, Coppermill Road	15	GB, GF	Site not at risk. Local area at risk from River Colne. Access at risk in 0.1%.	91.84	8.16	0	0	+	0	-	-	-	-	0	0	0	+	0	-
ST4/028	0.11	William Hill/Vodafone, 91, High Street	14	URBAN, PDL	Edge of site at Low hazard. Access at Moderate hazard.	74.04	25.96	0	0	+	+	-	+	0	0	0	0	++	+	0	-
Table 13																					
ST1/028	0.15	Leacroft Centre, Leacroft	17	URBAN, PDL	Site Moderate hazard. Access Significant hazard.	0	15.69	84.31	0	+	++	-	+	0	0	0	0	+	+	0	-
ST4/010	0.25	Riverside Surface Carpark, Thames Street	35	URBAN, PDL	Access route has Moderate and Significant hazard during 1% AEP incl. CC	0	0	100	0	+	+	-	+	0	0	0	0	++	+	0	-
ST4/026	0.25	Communications House, South Street	120	URBAN, PDL	Site and access at Significant hazard during 1% AEP incl. CC.	0	27.78	72.22	0	++	0	-	++	-	0	0	0	++	-	0	-
Table 14																					
ST4/002	0.9	Car Park, Hanover House & Sea Cadet Building, Bridge Street	158	URBAN, PDL	3b. Access at risk during design event.	1.24	9.81	40.73	48.22	++	0	-	++	0	0	0	0	++	-	0	-
ST4/011	0.36	Thames Lodge, Thames Street	40	URBAN, PDL	3b. Access at risk during design event.	0	0.48	70.47	29.06	+	+	-	+	0	0	0	0	+	+	0	-
ST1/029	0.47	Surrey CC Buildings, Burges Way	30	URBAN, PDL	3b. Access at risk during design event.	0	10.69	28.58	60.74	+	+	-	+	-	0	-	0	++	0	0	-
ST1/030	0.66	Fairways Day Centre, Knowle Green	30	URBAN, PDL	3b. Access at risk during design event.	0	4.11	14.63	81.27	+	+	-	+	0	0	0	0	+	+	0	-

*Notes: Sites in red are no longer allocated in the Local Plan due to the risk of flooding to the sites.*

## Part 2: Safe Development without increasing flood risk elsewhere

- 3.10 The Level 2 SFRA provides site proformas for each of the SLAA sites. The proformas summarise the flood risk from all sources to each site based on available datasets and provides requirements for site layout and development design to enable safe development that will not increase flood risk elsewhere.
- 3.11 The following sites are located entirely within the design flood extent (1% AEP including climate change), and currently used for non-residential 'Less Vulnerable' uses. For these sites, it will not be possible to provide level-for-level and volume-for-volume floodplain compensation storage within the development sites for any increase in building footprint. As a result, the built footprint of the new development of the site should not exceed that of the existing development. This may limit the number of units that can be delivered on the sites.
- ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY
  - ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB
  - AT1/012 Ashford Community Centre, Woodthorpe Road
  - ST4/009 The Elmsleigh Centre and adjoining land, South Street
  - SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ
  - ST4/026 Communications House, South Street
- 3.12 The Level 2 SFRA has identified that the following sites do not have access routes available that are either dry (i.e. do not flood) or at low hazard during the design event (1% AEP including an allowance for climate change). These are largely within Staines town centre, as well as 3 sites in Shepperton.
- 3.13 These sites will not be available for development until a safe route for access and egress can be provided and maintained during the design flood event (1% AEP including climate change). The safe route for access and egress must be provided to allow occupants to safely enter and exit the buildings and be able to reach land outside the flooded area using public rights of way, without the intervention of emergency services or others during design flood conditions, including climate change allowances.
- 3.14 The development of a plan for safe access and egress (dry, or Low hazard) may be developed for sites in isolation or in conjunction with other sites within the Staines or Shepperton town centres. The plan for safe access and egress (that is either dry, or at Low hazard) will be developed in consultation with the Lead Local Flood Authority (Surrey CC) and Emergency Planning teams and input from the Environment Agency is welcomed.
- 3.15 Any necessary infrastructure to be provided by the developer must be in place before any built development can commence on the site or in accordance with a timetable to be agreed with the Local Planning Authority, (and secured by a legal agreement to ensure the infrastructure to be provided on the site and be part of the allocation for its lifetime).
- 3.16 Shepperton:
- SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ
  - SH1/010 Shepperton Library, High Street
  - SH2/003 Shepperton Delivery Office, 47, High Street
- 3.17 Staines:

- ST1/028 Leacroft Centre, Leacroft
- ST01/037 Thameside House, South Street
- ST4/004 96-104, Church Street
- ST4/009 The Elmsleigh Centre and adjoining land, South Street
- ST4/019 Debenhams site, 35-45, High Street, TW18 4QU
- ST4/023 Two Rivers Retail Park Terrace, Mustard Mill Road, Staines
- ST4/024 Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines
- ST4/025 Land at Coppermill Road, Coppermill Road
- ST4/026 Communications House, South Street, Staines
- ST4/028 William Hill / Vodafone, Monsoon, High Street

3.18 All sites should seek to restrict surface water runoff rates to greenfield rates; demonstrate sustainable approaches to the management of surface water making use of SuDS; and incorporate soft landscaping, planting, and permeable surfacing. A preliminary Hydrogeological Risk Assessment (HRA) should be undertaken to determine ground conditions and groundwater levels in proximity to the site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage. The potential impact of climate change will be included within this assessment. Should the preliminary HRA identify potential for impact, a full HRA should be prepared to identify proposed mitigation measures.

## 4. Summary

### Sequential Test

- 4.1 This statement documents the application of the Sequential Test by Spelthorne BC for their SLAA sites.
- 4.2 The Local Plan housing requirement is **9,270** dwellings 2022-2037. Sites at lowest risk of flooding, whether on brownfield or greenfield land, have a capacity for **629** dwellings (Table 5 and Table 6). When including sites at low risk of flooding from rivers and medium risk of surface water flooding (either on the site or within the surrounding area), there is capacity for a total of **2,744** (Table 7 and Table 8). Including sites in Flood Zone 3 where vehicular access is available either dry or at low hazard, there is capacity for a total of **3,862** (Table 9 and Table 10).
- 4.3 Additional land is therefore required to meet housing need and Spelthorne BC need to consider remaining sites.
- 4.4 The remaining sites have more limited options with respect to access during the fluvial design flood event. Two sites in Flood Zone 3, with potential for pedestrian access at low hazard provides capacity for **990** (Table 11). Sites primarily within Flood Zone 1 and 2, but with no access route that is dry or low hazard provides **1,129** units (Table 12).
- 4.5 Three sites in Staines (Table 13) are located in Flood Zone 3, with no provision of access that is dry or at low hazard, providing capacity for **172**.
- 4.6 Four sites in Staines are partially with Flood Zone 3b, with no provision of access that is dry or at low hazard, providing capacity for **258**.
- 4.7 All the sites highlighted in bold in Table 5 through to Table 14 are considered to pass the Sequential Test, as **there are no available alternative sites at lower risk of flooding in Spelthorne**.
- 4.8 This provides a total capacity of **6,411** against the requirement of **9,270** dwellings.

### Exception Test

- 4.9 Where development is proposed in areas at risk of flooding the Exception Test is required, as determined by PPG Table 2.
- 4.10 As set out in para 031 of the PPG<sup>15</sup> the Exception Test requires two additional elements to be satisfied (as set out in paragraph 164 of the National Planning Policy Framework) before allowing development to be allocated or permitted in situations where suitable sites at lower risk of flooding are not available following application of the sequential test. It should be demonstrated that:
  - development that has to be in a flood risk area will provide wider [sustainability benefits to the community that outweigh flood risk](#); and
  - the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 4.11 Spelthorne BC have applied the Exception Test to the required sites.

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<sup>15</sup> Paragraph: 031 Reference ID: 7-031-2022082  
Revision date: 25 08 2022

4.12 With respect to Part 1) of the Exception Test, it is concluded that for the following sites, the wider sustainability objectives do not outweigh the flood risk posed to the sites and these sites will be proposed to the Inspector to be removed from the Local Plan allocations:

- ST1/029 Surrey CC Buildings, Burges Way
- ST1/030 Fairways Day Centre
- ST4/002 Car Park, Hanover House and Sea Cadet Building, Bridge Street
- ST4/010 Riverside Car Park
- ST4/011 Thames Lodge, Thames Street

4.13 How it can be demonstrated that wider sustainability benefits to the community outweigh flood risk, it set out in para 036<sup>16</sup> of the PPG. It explains that local planning authorities need to set their own criteria for this assessment, having regard to the objectives of their Plan's Sustainability Appraisal framework. Examples of wider sustainability benefits to the community are given and the first is *"The re-use of suitable brownfield land as part of a local regeneration scheme"*.

4.14 Staines-upon-Thames is the main town centre within Spelthorne and therefore sits top of the centre hierarchy in the Borough. With a main line train station, bus station and the range of facilities it is the borough most sustainable location. Staines is required to support a variety of uses, including shops, offices, leisure and entertainment facilities. The Local Plan recognises the size, location and significant opportunity presented by Staines for further regeneration.

4.15 The Council consider that the wider sustainability objectives for sites tested (other than the five listed in para 4.12) outweigh the flood risk posed to these sites. In addition to the regeneration benefits to Staines-upon-Thames, paragraphs 3.6 - 3.8 and Table 15's summaries of sites requiring the exception test show that the overriding sustainability benefits to the Borough clearly exist and relate to housing, land and soil, transport and economic development. More information is set out in the [Sustainability Appraisal of Draft Spelthorne Local Plan \(Regulation 19\) \(2022\)](#). The ten sites in Staines town centre together make up a significant part of the town centre. Failing to develop them would have a long-term negative impact on the town and they are essential to its regeneration.

4.16 The Youth Club and Library in Shepperton both provide opportunities for significant improvements to key community facilities and as such, will provide significant benefits to the community.

4.17 The potential effect of a combination of multiple benefits resulting from development of the proposed, appraised sites are considered to demonstrate that Part 1 of the Exception Test is met.

4.18 It therefore remains for proposals on these sites to pass Part 2) of the Exception Test i.e., the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

4.19 The Level 2 SFRA has identified 13 sites that do not have access routes available that are either dry (i.e. do not flood) or at low hazard during the design event (1% AEP including an allowance for climate change). These are largely within Staines town centre, as well as 3 sites in Shepperton. These sites will not be available for development until a safe route for access and egress can be provided and maintained during the design flood event (1% AEP including

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<sup>16</sup> Reference ID: 7-036-20220825  
Revision date: 25 08 2022

climate change) as set out in the main modifications proposed to the Inspector Dec 2024 and the signed Statement of Common ground with the Environment Agency (Oct 2024).

- 4.20 The Level 2 SFRA has identified 6 sites that are located entirely within the design flood extent (1% AEP including climate change), and currently used for non-residential 'Less Vulnerable' uses. For these sites, it may not be possible to provide level-for-level and volume-for-volume floodplain compensation storage within the development sites for any increase in building footprint. As a result, the built footprint of the new development of the site should not exceed that of the existing development. This may limit the number of units that can be delivered on the sites but will be considered at planning application stage. Main modifications have been proposed to the Inspector (Dec 2024) that suitable wording regarding site design and layout and built footprint is added to the allocations.

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