

Covering Note – Strategic Sequential Test

April 2018

Introduction

- 1.1. This covering note sets out the results of Runnymede Borough Council's 2018 Strategic Sequential Test (SST). Further information on the methodology used in the SST can be found in the accompanying methodology paper.
- 1.2. The SST is a sequential process that examines the flood risk associated with each site promoted through the SLAA and the allocations in the Local Plan (where the area of the allocations differs from the SLAA sites). The SST examines which Flood Zone(s) each site lies within, as well as other flood risk (such as surface or groundwater flooding) which could impact on each site.
- 1.3. [It should be noted that this covering note is an updated version of the covering note published alongside the Council's January 2018 SST. The SST has been updated in response to comments made by the Environment Agency during the Council's public consultation on the draft Local Plan in January and February 2018. Specifically it was commented that the Council's January 2018 Strategic Sequential Test \(SST\) appeared to contain incorrect flood zone data for SLAA site 51: Byfleet Road in New Haw. This led the Council to re-examine the flood zone data which had been relied upon for the purpose of the SST. It is apparent that the Environment Agency has a preference that the Flood Map for Planning is relied upon to define the extent of flood zone 3A for the purpose of the SST rather than the more detailed modelling provided to the Council during the preparation of its Level 1 Strategic Flood Risk Assessment which was relied upon in the production of the January 2018 SST. Changing the dataset for defining the extent of flood zone 3A has changed the results in some places in the assessment.](#)
- 1.4. [As a result of this further analysis, it was noted that the fluvial flood zone information for 56 of the 188 sites assessed was incorrect. The correct information has now been inserted into the SST for these sites and the analysis amended for these sites as necessary. All other sites remain unaffected. All changes made to the contents of this covering note are shown tracked.](#)
- 1.5. [Within the SST itself, where changes to the fluvial flood data have been made, changes are shown with red and green shading. Green shading indicates that there has been an improvement and red shading denotes that there has been a deterioration from a flood risk perspective in terms of the amount of a site which is located in a particular flood zone. In table three where the position of sites in the overall ranking has changed, these sites have been identified using purple shading in the far left hand column. Textual changes in table 3 are shown in red.](#)
- 1.6. [One new site was considered as part of the April 2018 SST. This is part of the Top Golf site in New Haw which only started being promoted to the Council during the January 2018 consultation on the draft Local Plan. All of the information relating to this new site is shown in red text.](#)

Step 1 – Identifying sites relevant for consideration

- 1.7. A total of 18~~98~~ sites were identified for consideration across the Borough in the SST, 178 of which have been promoted for development in the SLAA, [1 which was newly promoted through the January 19 draft Local Plan consultation](#) and the remaining 10 being allocations in the Local Plan where there is a difference between the area of the site as shown in the SLAA and the area proposed for allocation in the Local Plan. For reference, and for the avoidance of doubt, those sites proposed for allocation in the Local plan have been highlighted in bold and marked with an asterix (*) in each table of the SST.

Annex 1 – Sites too small or with planning permission

- 1.8. Sites with planning permission were not assessed further in the SST process. 42 sites had planning permission at the time the SST was undertaken and were therefore excluded from further analysis. [Of these, 13 of the sites had their fluvial flood zone data displayed incorrectly for the purpose of the SST. This has now been corrected in the updated April 2018 version.](#)
- 1.9. A further 7 sites were excluded at this stage in the process as they were below the minimum site size threshold. [Of these sites, 1 had its fluvial flood zone data displayed incorrectly for the purpose of the SST. This has now been corrected in the updated April 2018 version](#)

Table 1 – Initial Sift through of sites

- 1.10. The remaining 14~~039~~ sites were carried forward following the exclusion of the sites which are listed in Annex 1. The next stage examined the flood risk on each individual site, not only in relation to which Flood Zones each site is within, but also other types of flooding each site could be at risk of, including surface water, groundwater flooding and reservoir flooding.

Annex 2 – Sites which are more than 75% in Flood Risk Zone 1

- 1.11. A total of 9~~76~~ sites were found to have 75% or more of their area in Flood Zone 1. Of these, 8~~32~~ are wholly within Flood Zone 1. Of the remaining 14 sites, ~~28~~ sites are located within Flood Zones 1 and 2, with the remaining ~~126~~ sites are located within a mix of Flood Zones 1, 2 and ~~3a~~.
- 1.12. A detailed analysis of the other flood risks has been undertaken for each of these sites setting out where the flood risk lies on each site and steps that could potentially be taken to overcome these risks e.g. in relation to surface water flooding, reservoir flooding etc. The location of these flood risks on each site was identified in order to determine where potential development should either avoid or where mitigation would be required. The feasibility of infiltration SuDS was also examined on each of these sites.

Annex 3 – Sites where 75% or more of the site lies within the Functional Floodplain

- 1.13. ~~Four~~ ~~Five~~ sites (SLAA Reference 120, 216, 286, ~~and~~ 301 ~~and~~ 303) were found to fall within this criterion. As a result, the sites were not considered suitable for allocation in the Local Plan from a flood risk perspective as set out in Table 3 of the SST.

Annex 4 – Dry Island sites

- 1.14. Three sites (SLAA References 201, 228, 292) were considered to be wholly or partially within a Dry Island (land which in itself may not be at risk of flooding, but is surrounded by land at high risk of flooding and therefore referred to as ‘Dry Islands’).
- 1.15. Following a further analysis of these sites, two were found to not have a safe means of escape and as such, these sites are not considered suitable for development from a flood risk perspective as set out in Table 3 of the SST.

Table 2 Assessment – Sites that are less than 75% within Flood Risk Zone 1

- 1.16. A total of 35 sites fell within this classification. An assessment of the uses proposed on these sites as part of the SLAA process was undertaken, which examined whether the use was either Highly Vulnerable, More Vulnerable or Less Vulnerable (as highlighted in Table 2 of the Flood Risk and Coastal Change PPG). This will serve as a tool when determining whether the Exception Test will need to be applied.

Table 3 – Final Site Assessment Table

- 1.17. This is an amalgamation of Annexes 2, 3, 4 and Table 2, as well as the Local Plan allocations. It provides an assessment of whether the site is considered suitable for allocation in the Local Plan (based on flood risk alone).

Local Plan Allocations

- 1.18. The Strategic Sequential Test is only one part of the evidence which has been produced to support the identification of suitable sites which could be allocated in the Local Plan to meet identified development needs. The Council’s Site Selection Methodology and Assessment should be referred to for full details of the methodology that the Council has followed through the development of the Local Plan. Through this methodology, sites have been assessed in terms of their Green Belt performance, the existence of constraints (including flood risk) which could affect their development potential and a range of sustainability criteria.