Runnymede 2030 Local Plan (Emerging)

Statement of Common Ground between:

Runnymede Borough Council

and

Environment Agency

November 2018

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared jointly between Runnymede Borough Council ('the Council') and the Environment Agency, hereafter referred to as 'the parties'
- 1.2. This SoCG documents those matters agreed with regard to the Runnymede 2030 Local Plan (Emerging). More specifically it sets out the current position and matters of agreement relating to the infrastructure capacity – water quality and the Water Cycle Study (WCS) and flood risk at site 51: Byfleet Road, New Haw, to assist the Inspector during the Examination of the Local Plan.
- 1.3. This Statement of Common Ground is principally intended to address the representations made by the Environment Agency through the Regulation 19 Draft Local Plan Consultation (part 2) May 2018.
- 1.4. This statement is provided without prejudice to other matters or detail that the parties may wish to raise during the examination.

2. Background

- 2.1. Runnymede Borough Council is preparing a Local Plan which will supersede the existing Runnymede Local Plan, Second Alteration, 2001.
- 2.2. There has been ongoing and constructive cooperation between the Council and Environment Agency throughout the Plan preparation. This has included working closely during the preparation of the relevant evidence base documents such as the Strategic Flood Risk Assessment (levels 1 and 2), the Strategic Sequential Test and the Water Cycle Study.

- 2.3. The parties have also been formal partners in progressing the strategic flood alleviation scheme for the Lower River Thames known as the River Thames Scheme. Both parties are committed to continuing to co-operate and work closely together and in conjunction with other flood risk management authorities.
- 2.4. The Council's Duty to Cooperate documentation details how and when engagement with the Environment Agency has occurred during the course of Plan preparation.

3. Matters relating to the Runnymede 2030 Local Plan

- 3.1. Infrastructure capacity water quality and the Water Cycle Study (WCS
- 3.1.1. On 12 November Runnymede submitted an updated Outline Water Cycle Study to the Environment Agency to review. The document has been amended to respond to the concerns raised by the Environment Agency in their representation on the Local Plan dated 29 June 2018. The Environment Agency agreed to provide comments within 5 working days.
- 3.1.2. The parties agree the Outline Water Cycle Study dated November 2018 provides a robust, up to date evidence base assessing the environmental and physical demand of the proposed growth on water resources and supply and wastewater collection and treatment and identifies opportunities for more sustainable planning and improvements so proposals don't exceed the existing water cycle capacity.
- 3.1.3. The parties agree the Water Cycle Study should be reviewed as and when further information becomes available.
 - 3.2. Flood risk at site 51: Byfleet Road, New Haw
- 3.2.1. Surrey County Council in consultation with the Environment Agency commissioned modelling of the Rive Ditch at the end of 2013. The model is based on a pluvial assessment but has been modified to include consideration of fluvial and sewer flooding sources. This is therefore a combined source model (holistic) considering multiple sources of flood risk.
- 3.2.2. The model and its modelling outputs were peer reviewed by March 2017 when the model outputs were sent to the Environment Agency by Surrey County Council. However, the Environment Agency was not satisfied that the model represented the known historic flooding at the site, so further assessment was undertaken.

- 3.2.3. A fluvial only assessment has been undertaken, which is currently being reviewed by the Environment Agency. At the current time, the Environment Agency is working to verify the suitability of the modelling to represent fluvial flood risk at the site and whether the model could be used to update the flood Map for Planning (Rivers and Sea).
- 3.2.4. Surrey County Council shared the Rive Ditch modelling outputs with the Council in May 2018. The Council updated its level 2 Strategic Flood Risk Assessment for the Byfleet Road employment allocation based on these final holistic modelling outputs. The revised Level 2 SFRA (April 2018) was subject to public consultation as part of the 2nd round of consultation on the draft Local Plan in May and June 2018.
- 3.2.5. The model in its current form does not include a 1 in 20 year (5% AEP) fluvial extent to represent the functional flood plain. As such, the council's SFRA Level 1 sets out that Flood Zone 3 should be used to define the functional flood plain when detailed modelling is not available to represent the 1 in 20 year flood.
- 3.2.6. The assessment of climate change is based on the holistic model and not on a fluvial model run. As such, the extent of flood risk during a 1 in 100 year (1%) with an appropriate allowance for climate change flood is unknown. The Environment Agency Local Plan representation dated 22 February 2018 raised questions about the viability of the site allocation.
- 3.2.7. The April 2018 Level 2 SFRA was also updated to take into account a number of modelling outputs from the new Lower Thames model (Hambledon to Teddington). This updated modelling is being produced to support the development and delivery of the River Thames Scheme.
- 3.2.8. The Council and the Environment Agency met on 12 November 2018 to discuss these issues. It was agreed that:
 - The Council would arrange a meeting with Surrey County Council, the Environment Agency and Woking Borough Council to discuss progress with the Rive Ditch modelling, the next steps in the process and timescales for getting the methodology and modelling outputs agreed.
 - The Council would make contact with the site promoter at the Byfleet Road site to update them on the current position with the Rive Ditch modelling and to suggest that one option open to the site owner would be for them to carry out their own modelling for the site.
 - The Environment Agency would meet with the site promoter at the Byfleet Road site to provide advice on the proposed development at the site and any

requirements for site level modelling, if this was something that the promoter wanted to explore.

4. Continued working between the Environment Agency and Runnymede Borough Council

4.1. The Environment Agency and Runnymede Borough Council both commit to continued dialogue prior to, during and after the Council's Examination in Public on Policy SD3: Site Allocations in particular site 51: Byfleet Road, New Haw and Policy IE1: Employment allocations.

5. Conclusion

5.1. The representations made by the Environment Agency through the Regulation 19 publicity period of Local Plan 2030 Part 2 have been and are continuing to be addressed through this Statement of Common Ground.

Signatories

Al. Mille Rear.

Carty Harrison

Councillor Nick Prescot, Leader of Runnymede Borough Council

Cathy Harrison, Sustainable Places, Environment Agency