

## **Note: Update on Agreement on the Level 2 Strategic Flood Risk Assessment Addendum between the Environment Agency and Surrey Heath Borough Council**

### **Background**

The Level 2 Strategic Flood Risk Assessment (SFRA) was undertaken by JBA Consulting on behalf of the Council, and was prepared in accordance with a methodology that had been agreed in advance with the Environment Agency. The Level 2 SFRA was published on 1<sup>st</sup> April 2025. Subsequently, on the 23<sup>rd</sup> June 2025, the Environment Agency indicated that the Council should carry out a sensitivity analysis of sites identified in the Level 2 SFRA, in order to understand any changes to flood risk at allocated sites resulting from the introduction of the Flood Map for Planning, which was released publicly after the completion of the Level 2 SFRA.

An Addendum to the [Level 2 Strategic Flood Risk Assessment \(SHBC9A\)](#) was subsequently published on 26<sup>th</sup> August 2025.

### **Feedback from the Environment Agency & the Council's response**

The Environment Agency issued feedback on the Level 2 SFRA and the associated [Sequential & Exceptions Tests for Site Allocations – Flood Map for Planning Addendum \(SHBC9B\)](#) on the 30<sup>th</sup> September 2025.

The feedback identified three outstanding matters that the Environment Agency considered should be addressed. These related to online mapping, changes to the Level 2 SFRA (rather than the Level 2 SFRA Addendum) and a textual error in the Sequential and Exceptions Test Addendum.

The Council subsequently responded to the Environment Agency to set out its response to the feedback. In doing so, The Council indicated that it did not consider that any of the points raised would warrant a further update to the L2 SFRA Addendum or Sequential & Exceptions Test Addendum.

### **Outcomes of engagement**

On the 3<sup>rd</sup> October 2025, the Environment Agency responded, accepting the Council's position on the points raised. Accordingly, agreement has been reached between the Environment Agency and Surrey Heath Borough Council on the Level 2 Strategic Flood Risk Addendum.

Detailed comments and outcomes in respect of each matter raised are set out at Table 1.

**Table 1: Engagement between Surrey Heath Borough Council and the Environment Agency in respect of the Level 2 Strategic Flood Risk Addendum and associated Sequential & Exceptions Tests for Site Allocations – Flood Map for Planning Addendum**

Initial Environment Agency Feedback (30/09/25)	Surrey Heath Borough Council Response (01/10/25)	Environment Agency Response (03/10/25)
<p><b>The Deans, Bridge Road (Allocation at Bagshot, The Deans (HA1/11))</b> The site previously had significant flood risk constraint therefore an update regarding how the risk on site had been considered in the L2 SFRA was required.</p> <p>In regard to assessing the flood risk on site against the most up to date flood data, the comparison carried out by JBA looks at the latest Flood Map for Planning and the Long Term Flood Risk map (the published NaFRA2 mapping).</p> <p>We refer you to SHBC interactive portal which is signposted in the latest update addendum table and still uses the now superseded mapping, which was not as robust as the latest data in this location. We note this GIS mapping is due to be updated in September 2025.</p> <p>The latest version of the published Flood Map for Planning shows a much-reduced level of risk, in line with the L2SFRA addendum description.</p> <p>Please ensure the latest datasets are published on the LPA's interactive mapping/portal to accurately represent the flood risk on site and also to ensure the conclusions of the SFRA are valid.</p>	<p>The LPA's interactive mapping that supports the L2 SFRA and Addendum was updated in early September. Accordingly this concern has been addressed.</p>	<p>Points 1 and 3 related to an advisory update of the data source, which is now confirmed, and we accept that this is covered elsewhere in your supporting documents.</p>
<p><b>Swift Lane Extension</b> Swift Lane extension shows the historic flood extent from 1968, which is far greater than the 0.1% Annual Probability extent in the New National Modelling (NAfRA2 model).</p> <p>It has been stated in several places in the SFRA (March 2025 and Addendum as well that, developers should undertake detailed modelling of climate change allowances as part of a site-specific FRA. We would like highlight that as the site is proposed for highly vulnerable development (see below), detailed modelling of climate change allowances may be useful to understand flood risk at this site. We suggest the SFRA level 2 (for Swift Lane) should be updated to reflect this point and have suggested the amendment below in the SFRA.</p>	<p>Paragraph 2.8 is within the L2 SFRA and it would not be appropriate to revise this document, which does not have regard to the updated FMfP and was finalised earlier this year.</p> <p>Notwithstanding this, Para 2.8 of the L2 SFRA already indicates that the site specific SFRA should investigate the mechanism of the 1968 flood and reflecting this, Para 2.2.1 of the SFRA already states: <i>"the recommendations made within the Level 2 assessment will still need to be considered for development to proceed at this site...A site-specific FRA should also investigate the mechanism of the historic flood event in September 1968 and whether there have been changes to the site since this event"</i>.</p>	<p>Thank you for confirming paragraph 6.2.4 in the L2 SFRA, we accept that this covers the potential need for detailed flood modelling at the Swift Lane Extension.</p>

<p>2.8 Flood history</p> <p>The EA's historic flooding and recorded flood outline datasets show that in September 1968 Windle Brook exceeded its capacity and overtopped. This storm event resulted in the entirety of the site being flooded. There are no recent flood events recorded within the EA datasets. <b>However, a site-specific FRA should investigate the mechanism of the historic flood event in September 1968</b> and whether there have been changes to the site since this event. <b>Detailed hydraulic modelling may be required to ensure this Highly Vulnerable development type remains safe from fluvial flooding over its lifetime.</b> This is necessary to identify whether a similar event could occur in future, or if there are any mitigating factors that suggest the site is no longer at risk.</p>	<p>Accordingly, the first sentence highlighted in bold is already reflected in both the L2 SFRA and its Addendum.</p> <p>It is noted that the second sentence highlighted in bold is new.</p> <p>The potential need for detailed hydraulic modelling is already covered by Para 6.2.4 of the L2 SFRA which sets out “<i>Where no recent detailed hydraulic modelling is present, it is recommended that developers construct new, or update existing, detailed hydraulic models at these sites as part of a site specific FRA using channel, structure, and topographic survey to confirm flood risk during the 1% AEP plus climate change 'design event'.</i>”</p> <p>As a result, the Council doesn't consider that it is essential to update the Swift Lane section of the Level 2 SFRA Addendum on this basis.</p>	
<p>Swift Lane is proposed for a development which is highly vulnerable according to Annex 3 of the NPPF therefore please amend paragraph 2.20 of the Exception Test and Sequential Test document to read;</p> <p>2.20. As a result, the conclusion reached in the Sequential and Exception Tests for Site Allocations (March 2025) – that development at the site should be treated as high risk – remains valid and appropriate. It is also noted that Swift Lane Extension is the only ‘<b>highly</b> vulnerable use’ identified in the Sequential Test and that as a result, no re-sequencing of sites arises from the change in fluvial flood risk associated with the introduction of the FMfP.</p>	<p>The textual error at Para 2.20 is noted, however this is a textual error only and does not go to the heart of the soundness of the assessment. It is otherwise clear in both the Sequential and Exceptions Test and its associated Addendum that the site is classified as a highly vulnerable use and has been assessed as such.</p>	<p>Points 1 and 3 related to an advisory update of the data source, which is now confirmed, and we accept that this is covered elsewhere in your supporting documents.</p>