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Dear Mr Dyer

SPELTHORNE DEVELOPMENT PLAN – ALLOCATIONS DPD

Thank you for your consultation on the above document.

It is considered that the allocation of site A8: Riverside Works, Fordbridge Road, Sunbury (P/026/H) within the Allocations DPD is unsound for the following reasons:

Test 4B – It is inconsistent with national planning policy

Test 4C – It is not in general conformity with the RSS

Test 7 – The allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base

Representations on the allocation of this site have not been previously raised. The reason for this was that Elmbridge Borough Council did not want to unduly raise concerns without first having had knowledge of the findings of the Strategic Flood Risk Assessment, which was not available at the previous consultation stages.

Test 4B

The proposed development of this site for 50 dwellings would be inconsistent with national policy as set out in PPS1, PPS25 and PPG13. The potential impact of this development upon the amenities of the residents in Elmbridge Borough Council on Wheatley's Eyot would be significant. The site is located within Flood Risk Area Zone 2 and adjacent to Zone 3b and therefore its development could result in flood risk and harm to the residents of this site and those on Wheatley's Eyot. The site is not in a sustainable location and its development would result in reliance on the private car for its residents for access to services and facilities.

Test 4C

The proposed development of this site for 50 dwellings could potentially not be in conformity with the draft RSS. Reference should be made to Cross Cutting policies CC1 and CC2

relating to sustainable development and climate change. The development of this site in a unsustainable location with potential flooding issues would be contrary to these policies.

Test 7

The Sustainability Appraisal for this site allocation against the eighteen Sustainability Objectives reports an uncertainty of the impact of the development of this site against SA objectives 4, 5, 6 and 12 and only achieves seven positive scorings out of the eighteen objectives. The relevant objectives leave open concerns regarding the impact of flooding and the poor accessibility of the site to and from services and facilities. It is not considered that by allocating this site that the social or environmental objectives of sustainability will be achieved.

This representation relates to paragraphs 6.64 – 6.73 of the Allocations DPD and Allocation A8 outlined on the Proposals Map.

To make the Allocations DPD sound, it is considered that this site should be deleted.

These representations can be considered by Written Representations.

Yours sincerely

Head of Town Planning