

**SPELTHORNE CORE STRATEGY AND POLICIES DPD
REPRESENTATIONS ON ALTERNATIVE SITE ALLOCATIONS**

July 2008

**Summary of Representations made to the Consultations on
Alternative Site Allocation Representations carried out in accordance with Regulation 32
from 13 September to 25 October 2007 and 6 May to 27 June 2008**

July 2008



SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS ON ALTERNATIVE SITE ALLOCATIONS

This summary of the main issues raised relates to those site allocation representations which proposed changes to designated areas shown on the submission Proposals Map or which related to policies included within the Core Strategy and Policies DPD. These include ASAs 3-7, which were consulted on from 13 September-25 October 2007 (first consultation) following submission of the Core Strategy and Policies DPD in June 2007, and ASAs 36-42, which were consulted on from 6 May to 27 June 2008 (second consultation) following the consultation on the Re-Advertised Core Strategy and Policies DPD in March/April 2008.

The summary includes some representations which contained general comments relating to all sites.

Where a large number of respondents made similar objections to a specific proposal they have been grouped together and summarised in one entry. In all other cases representations objecting to or supporting specific proposals are summarised individually.

The total number of representations received concerning matters to be considered in the Examination of the Core Strategy and Policies DPD was 85. Any representations submitted in relation to ASAs 1-2 and 8-35 which proposed alternative sites to be considered in the context of the Allocations DPD Examination are set out in a separate document.

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Customer Name	Policy Ref	Part no	Part Title	Policy Title	Comment Ref	Rep Type	Contributor Comments	Response
Surrey County Council (first consultation)		All	DOC		C/DAII/00034/00005/001	COMM	No objections.	Noted
Defence Estates (first consultation)		All	DOC		C/DAII/00243/00001/001	COMM	No objections.	Noted
Thames Water (first consultation)		All	DOC		O/DAII/00004/00004/001	OBJ	On the current information supplied by the developers/responders Thames Water is unable to make an assessment on the impact that these sites would have on its infrastructure.	None of the sites where it is proposed to change the designation of land would have any direct consequences for water resources, although any subsequent or resulting development proposals would need a Flood Risk Assessment where appropriate. The Council does not support any of the proposed changes to designated areas.
Thames Water (second consultation)		All	DOC		C/DAII/00004/00004/002	COMM	Has no specific comments to make regarding the additional sites at this stage as it is difficult to comment due to the infinite number of combinations which could happen.	As above

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Highways Agency (first consultation)		All	DOC		C/DAII/00060/00005/001	COMM	The potential impact of a change in designation and alternative use on the Strategic Highways Network has not been evaluated for any of the proposed sites.	None of the sites where it is proposed to change the designation of land would have any direct impact on the strategic highway network, although any subsequent or resulting development proposals would need to be fully evaluated. The Council does not support any of the proposed changes to designated areas.
Highways Agency (second consultation)		All	DOC		C/DAII/00060/00005/002	COMM	Repeats previous concerns about sites being put forward where there appears to be no evaluation of the transport impact of the changes.	As above
Elmbridge Borough Council (second consultation)		All	DOC		C/DAII/00026/00003/001	COMM	Has no further comment to make on the site allocations.	Noted
Government Office For The South East (second consultation)		All	DOC		C/DAII/00325/00003/001	COMM	Has no comment to make on any of the sites.	Noted

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Customer Name	Policy Ref	Part no	Part Title	Policy Title	Comment Ref	Rep Type	Contributor Comments	Response
Environment Agency (second consultation)		All	DOC		C/DAII/00036/00002/001	COMM	The Environment Agency has provided specific and general flooding comments on most of the sites included in the consultation setting out the SFRA implications if any of the alternative allocations were to proceed.	None of the sites where it is proposed to change the designation of land would have any direct consequences for flood risk, although any subsequent or resulting development proposals would need to be fully evaluated. The Council does not support any of the proposed changes to designated areas.
Surrey Chambers of Commerce	EM1	ASA03	Mimosa Court, Littleton Road, Ashford	Employment Development	O/EM1/00017/00002/001	OBJ	Object to proposed loss of employment designation. Site ideal for small businesses - particularly offices which are in very short supply and needed to encourage the economic growth of the area.	Noted
Persimmon Homes (South East) Ltd	EM1	ASA03	Mimosa Court, Littleton Road, Ashford	Employment Development	O/EM1/00411/00008/004	OBJ	No evidence to show the site's designation as part of an employment area is unsound and its loss could jeopardise the Borough's employment strategy.	Noted
Shepperton Residents Association	EM1	ASA04	Shepperton Centre	Employment Development	O/EM1/00727/00005/003	OBJ	Wants to see the designated employment area retained as they do not want to see any further development of land in Shepperton.	Noted

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RPS Planning	EM1	ASA04	Shepperton Centre	Employment Development	O/EM1/00680/00002/003	OBJ	Supports designation of Shepperton Centre for employment to meet local needs and maintain employment and economic growth. This is a sustainable location.	Noted
Persimmon Homes (South East) Ltd	EM1	ASA04	Shepperton Centre	Employment Development	O/EM1/00411/00008/005	OBJ	No evidence to show the site's designation as part of an employment area is unsound and its loss could jeopardise the Borough's employment strategy.	Noted
Surrey Chambers of Commerce	EM1	ASA04	Shepperton Centre	Employment Development	O/EM1/00017/00002/002	OBJ	Wants to see employment designation retained as the area is ideal for small business activity close to residential accommodation.	Noted
Shepperton Residents Association	EM1	ASA05	Littleton Lane Quarry, Littleton Lane, Shepperton	Employment Development	O/EM1/00727/00005/001	OBJ	Object to proposed designation as no further industrial use should be allowed once restoration of land has taken place.	Noted

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Natural England	EM1	ASA05	Littleton Lane Quarry, Littleton Lane, Shepperton	Employment Development	O/EM1/00505/00003/001	OBJ	Site is adjacent to the Shepperton Quarry SNCI and 2.44km from the South West London Waterbodies SPA. Bird species for which the SPA is 'notified' could be using the adjoining SNCI site. Consider proposal is likely to have a significant effect on the SPA. An Appropriate Assessment is required to look at the impacts of the proposal on SPA birds including the cumulative impacts from other plans and projects. (NB subsequent correspondence between the owner and Natural England has sought to clarify the need for Appropriate Assessment.)	The Council agrees that any proposals to redevelop the area for industrial development or to intensify activity on the site could require an assessment. The Council does not support any changes to the designation of this site.
RPS Planning	EN4	ASA06	St Paul's School, The Ridings, Lower Sunbury	Provision of Open Space, Sport and Recreation Facilities	S/EN4/00680/00002/001	SUPP	Does not object to removal of the urban open space designation but only if it is used for educational or community purposes, and formally designated as such.	Noted

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55 Respondents	EN4	ASA06	St Paul's School, The Ridings, Lower Sunbury	Provision of Open Space, Sport and Recreation Facilities		OBJ	Object to change in designation and prospect of building development. Land forms a necessary and reasonable barrier between local housing and a school. The Council should compulsory acquire the site for public sports use. There is a continuing and growing need for educational services in the Borough. Loss of this designation would make the site vulnerable to more development. Local infrastructure is already overstretched and more development would result in increased traffic and strain on local services. Green Street area is over-developed resulting in increased noise, traffic and pollution.	Noted
Cllr Colin Strong		ASA36	Area around Beechwood Avenue, Sunbury Common		S/DASA36/00726/00005/015	SUPP	Supports the extension of the area of Protected Urban Open Space (proposed under ASA7). Area is known for its special character.	Noted.

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Cllr Robbie Colison Crawford		ASA36	Area around Beechwood Avenue, Sunbury Common		S/DASA36/01336/00001/001	SUPP	Supports increased protection for the whole Kenyngton Drive Area. The area suffers from access problems and flash flooding and cannot accommodate additional housing. It is essential that this award winning estate designed by Sir Basil Spence is protected.	Noted.
Mrs Brenda Webb		ASA36	Area around Beechwood Avenue, Sunbury Common		O/DASA36/00949/00001/001	SUPP	Supports the designation of the "River Gardens Estate" as a special character area.	Noted
Ms Kath Sanders		ASA36	Area around Beechwood Ave, Sunbury Common		S/DASA36/01337/00001/002	SUPP	Excluding the risk of inappropriate development will prevent reduction in amenity and the creation of a "special character area" has the potential to improve the environment in the longer term.	Noted
CEMEX		ASA37	Land at Vicarage Farm, Halliford Road, Sunbury		S/DASA37/00720/00005/004	SUPP	CEMEX support their own proposal to designate their site as Degraded Land and reiterate their original submission to the re-advertised Core Strategy and Policies DPD.	Noted

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Mr Gerald Edgar		ASA37	Land at Vicarage Farm, Halliford Road, Sunbury		O/DASA37/01310/00001/006	OBJ	Site is in the Green Belt and not needed to meet housing targets	Noted
Mr Donald Prance		ASA37	Land at Vicarage Farm, Halliford Road, Sunbury		O/DASA37/00799/00001/006	OBJ	Land does not appear to be degraded. Land cannot be considered as degraded unless it is impassable due to man made debris or heavily polluted.	Noted. No evidence has been submitted by the proposers of the site to support its designation as degraded land.
Ms Kath Sanders		ASA38	Sunbury Cross Employment Area		S/DASA38/01337/00001/001	SUPP	Deletion of the employment area designation would enable the redevelopment of unused office space, improve the local environment and reduce pressure on development of greenfield sites.	Noted
Mr and Mrs Gurney		ASA42	91-105 Staines Road West Sunbury		0/DASA42/01013/00001/001	OBJ	Want to see Employment Area designation retained and also object to the proposed allocation of site for mixed use on grounds of parking issues, noise and privacy.	Noted

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Mr Patrick Brady		SFRA	Flood Risk Areas		S/DSFRA/01309/00001/001	SUPP	Supports the proposed change to the flood risk maps provided the new zones are correctly described. Suggests that mapping should show range of risk not just the lower limit.	The flood risk maps are supplied by the Environment Agency and the Key to the Submission Proposals Map accurately describes their content.
Green Street Action Group		SFRA	Flood Risk Areas		O/SSFRA/00353/00003/001	OBJ	Consider that to revert to the Environment Agency's mapping of flood risk will not allow consideration of surface water, groundwater or sewer overload. Comments on aspects of the SFRA.	The Council's SFRA has considered risks from all forms of flooding. The updated flood risk maps show the current risk from fluvial flooding and the Council is committed in the application of policy to use the latest available flood risk maps. It appears the objector has assumed that the Council is reverting to the older EA data, which is not the case.
Notcutts Ltd		SFRA	Flood Risk Areas		O/SSFRA/00003/00006/001	OBJ	Concerned that the proposals map once adopted will be out of date and ineffectual very quickly. Potential development sites may be subjected to changing flood risk designations with the risk that housing land may be sterilised. Policy should be drafted to allow decisions to be taken on the facts at the time of the grant of planning permission.	Sites will always need to be assessed against the latest available flood risk information and the policy allows for that approach to be followed. The Key to the Submission Proposals Map also reiterates this point.

