

SPELTHORNE CORE STRATEGY AND POLICIES DPD

RE-ADVERTISED VERSION

FEBRUARY 2008

**Summary of Representations made to
Consultation held from 6 March – 17 April 2008
and the Council's response**

July 2008



Spelthorne Re-Advertised Core Strategy and Policies DPD – Summary of Representations

Respondent	Doc Part	Part No	Policy	New/Amend/ Replace/ Prev. Invalid/ Withdrawn	Summary of Representation	Response
Natural England	DOC	All		-	Confirms previous comments.	Noted.
Notting Hill Housing	DOC	All		New	Consider DPD to be sound.	Noted.
SEEDA	DOC	All		New	Supports document which is well aligned to Regional Economic Strategy (RES). Considers strategic policies SP1-SP7 complement the RES.	Noted.
Surrey County Council	DOC	All		Amend	Continues to express general support for the approach and policies of the Plan. Objectives are generally sound and compliant with Government policies, Structure Plan and other plans and policies of County Council. Support strategic housing policies and approach to meeting housing requirements.	Noted.
Government Office For The South East	DOC	All		-	No further representations - notes that Chapter 4 is in line with GOSE's suggested improvements.	Noted.
Highways Agency	DOC	All		-	No further comments to make.	Noted.
SEERA	DOC	All		-	Confirm Regional Assembly has no further representations to make to those already submitted.	Noted.
Surrey Chamber Of Commerce	DOC	All		-	No further comments to make on plan.	Noted.
The Theatres Trust	DOC	All		-	No further comments to make.	Noted.
Waverley Borough Council	DOC	All		-	No comments to make.	Noted.
Charles Morris Fertilisers	DOC	All		New	Site of Oak Leaf Farm is identified in the submitted Surrey Waste Plan for waste related use and once adopted should be shown on the Spelthorne Proposals Map and thus safeguarded for such purposes.	It is already a statutory requirement that the adopted Proposals Map would need to show proposals in the County Council's Waste and Minerals LDF/Local Plan.

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Charlton Village Residents Association	DOC	All		New	A draft Supplementary DPD in the form of a Village Design Statement has been submitted. It objects to an assumption that the Borough is an homogenous entity and thus fails to recognise the uniqueness and associated problems of Charlton Village. Six policies which form part of the SPD are set out. These cover the retention of the public house, the type of new housing, garden size, the 'Lex' depot site, car parking and need for HGV width restriction. Concerns about public amenity space and flooding are also noted.	The DPD does not seek to suggest the Borough is homogenous, but various parts of the Borough face many common issues and the solutions to these will be the same. The DPD sets out clear policies on retaining social and community facilities, type of housing required, design of new development including provision of amenity space, car parking, public open space and flooding. Controls on HGVs – where appropriate – are a County Council matter. These are considered appropriate to cover the issues referred to.
Cllr Ian Beardsmore	DOC	All		Amend	Area around Beechwood Drive (covered by Urban Open Space Area D3 and land to the north) should be designated as a Special Character Area because of its uniformity of building and design and pleasing amount of green space. Sunbury has unique problems. The amount of new housing is grossly out of proportion to its size and the rest of the Borough. The A308 has the worst air pollution and the worst traffic congestion. Sunbury needs specific solutions. Proposes 5 specific policies dealing with 1) amenity space and the number of floors in a development; 2) a parking standard of 1.8 spaces per dwelling and no underground car parks; 3) no development on any green belt or protected open space within TW16 post code area; 4) no net loss in green infrastructure, with new tree planting requirements; 5) all development will be carbon neutral.	No robust evidence to demonstrate special character to justify prohibiting any redevelopment that might otherwise be in accordance with the policies of the DPD. Policies already exist on amenity space, design of dwellings and parking standards. The DPD focuses development in the urban area and protects urban open space. It also has policies reflecting climate change issues. No case for different policies from those already in the plan.
Cllr Ian Beardsmore	DOC	All		Amend	TRANSPORT STATEMENT: The document has not been tested or consulted on and is unreliable and unsound. It concludes that all new development or brownfield sites will result in less traffic generation than currently and does not recognise that there is a non-trunk network in the Borough.	The Statement sets out detailed evidence and is agreed by the Highways Agency and Surrey County Council. The DPD appropriately addresses the need to reduce congestion and encourage more sustainable travel choices.
Fairview New Homes Ltd	DOC	All		New	In omitting to examine the Green Belt as a policy constraint no regard has been paid to Para 37 of PPS 3 and Para 68 of PPG 3.	Disagree. DPD complies with the emerging South East Plan and the requirements of PPS 3.

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Fairview New Homes Ltd	DOC	All		New	The draft RSS for SE fails to take account of the 2003 Household Projections. This approach is flawed which means the Core Strategy is flawed resulting in under provision of housing.	Plan takes account of both the 2003 and 2004 projections – see para 7.21 of the Panel's report.
Fairview New Homes Ltd	DOC	All		New	The Council unduly rely on speculative windfall sites contrary to para 59 of PPS 3.	Reliance on windfalls can be made where there is a robust case to do so.
Fairview New Homes Ltd	DOC	All		New	Core Strategy seeks to reduce flooding and the risks from flooding, but allocates sites liable to flooding.	Two sites are so allocated but FRAs show there are no unacceptable risks.
Fairview New Homes Ltd	DOC	All		New	Core Strategy is inflexible and fails to allocate enough land for housing and is unlikely to accommodate additional housing from S of S proposed modifications to RSS.	Disagree. See Housing Land Availability Update.
Green Street Action Group	DOC	All		Amend	Considers amendments and removal of 'saved policies' has not improved clarity of document. Areas of farmland should be identified and safeguarded with a positive policy towards agriculture. Areas of degraded landscape that could be restored to farmland should be identified with an action plan.	Saved policy issue already dealt with. Farmland protected by being in the Green Belt. Enhancing landscape, which includes degraded areas, covered by Policy EN8. Whether agriculture is an appropriate new use for degraded sites will depend on the nature of the site.
Henry Streeter (Sand And Ballast) Ltd	DOC	All		New	There is insufficient land in Spelthorne outside the Green Belt to maintain necessary annual level of housebuilding throughout and beyond plan period. Plan should review Green Belt and avoid boundaries which are drawn excessively tightly around existing built up areas.	Disagree.

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Jockey Club Racecourses	DOC	All		New	Plan has not taken account of responses made during Options and Preferred Option stages. At Options stage it was suggested that Kempton Park Racecourse should be identified as a 'Major Developed Site' in the Green Belt together with a site specific policy. At Preferred Options stage it was proposed that the built up part of the site be removed from the Green Belt and identified by a specific policy relating to the racecourse use.	The objector suggests representations made at previous stages of the plan's preparation have not been taken into account. Their comments at the Options stage that the site be designated as a 'Major Developed Site' are set out in 'Report on the Issues and Options Consultation' Sept-Nov 2005 (CD/SBC/034) – page 49. In that report the site's Green Belt status was explained as well as consideration of the MDS issues by the Inspector who conducted the Local Plan Inquiry in 1998 when the same proposal for designation was made. That Inspector concluded the developed area was not 'major' and accepted the Council's view it could not be regarded as a 'major developed site'. He also accepted that the two other pre-conditions to such designation, which are respectively the need for jobs and environmental improvement, did not apply in this case. There has been no change in circumstance or government guidance on this issue (PPG 2) and no reason for the Council or the Inspector to come to a different view. At the Preferred Options stage the 'Report on the Preferred Options Consultations' May-June 2006 (CD/SBC/037) recorded the representation at Page 87. The response considers the proposal for development of part of the site inconsistent with its designation as Green Belt or related to the horse-racing activity on the site.
Jockey Club Racecourses	DOC	All		New	Council's decision to dismiss the need to consider a Green Belt review does not reflect responses received during public consultation process.	As above. Also, no exceptional case to review the Green Belt.
Jockey Club Racecourses	DOC	All		New	SA has not considered Green Belt review and is based on view that all development needs could be met from urban area. SA is flawed and should not be used as a guide to formulation of locational policies.	Approach to Green Belt is set out in PPG 2 and has been followed.

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Lower Sunbury Residents Association	DOC	All		Amend	Opposed to any review of Green Belt; provides additional general comments on housing density and need for family housing, car ownership, open spaces for the elderly, previously developed land, excluding gardens, and concern about intensive development.	Note Green Belt view. Several comments collectively seek in effect to oppose development or otherwise ensure land is used efficiently as required by PPS 3. Policy CO3 does apply to open space for elderly persons' accommodation.
Mr John Carruthers	DOC	All		New	Objects to whole plan and considers it should be withdrawn and re-submitted.	Noted.
Cllr Caroline Nichols	DOC	All		New/Amend	Additional development at Charlton Lane Waste site will have highway impacts with implications for 'place shaping'. Sunbury has unique problems. Housing estates have unique design and spatial character but are coming under threat from infill development. Also refers to sustainable development design. There should be a greater commitment to community consultation.	Various points in representation noted. Some already covered in policies, eg CC1 in relation to sustainable development. Policy EN1 considered to provide a sound basis to assess design issues and SPD is to be produced in due course. Policy CO2 already deals with community infrastructure. Disagree with suggestions on making pre-application discussions public and design panels.
Ms Lois Clark	DOC	All		New	Do not need more housing in Spelthorne but need more facilities for existing residents.	There is a housing need.
Robert Brett & Sons Ltd	DOC	All		New	Consider minerals issues should be addressed in Core Strategy and Proposals Map, but accepts these will be shown once DPDs are adopted and subject to continued co-operation between District and County Council.	Mineral issues are for the County Mineral DPD.
Savills Incorporating Hephher Dixon	DOC	All		-	Confirm original submission remains valid.	Noted.
Shepperton Residents Association	DOC	All		Amend	Confirm main concerns continue to be: housing density, infrastructure, environment, conservation and community involvement.	Noted.
The Pinewood Studios Group	PARA	4.6		Amend	Support plan overall but considers wording should be tested to ensure sufficient flexibility to meet future land use requirements.	Noted – previously commented on.
The Pinewood Studios Group	PARA	4.8		Amend	Flood boundary may not be robust. Detailed studies undertaken by Studios in 2003 have shown boundary may not be accurate and should not be used as a guide to developable areas.	Objectors view based on out-dated information.

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CEMEX			SP1	Amend	<p>Policy ignores clear cut evidence base set out in the Air Transport White Paper (ATWP) and associated documents that provision should be made for the expansion of Heathrow Airport and that land needed for future airport expansion should be safeguarded. The policy is insufficiently flexible to deal with changes in circumstances.</p> <p>Policy ignores the evidence base set out in the Draft South East Plan and the need for increased housing provision, and is insufficiently flexible to deal with changes in circumstances, such as the need for more land for new housing.</p> <p>There should be a new policy included in the DPD which would allow for small scale review of the Green Belt policy.</p>	<p>Comments on ATWP previously dealt with. The DPD meets the requirements of the South East Plan.</p> <p>No case to review the Green Belt.</p>
Crane Road Properties			SP1	Amend	<p>Policy fails to have regard to future housing requirements which could arise from the SE Plan and from the future growth requirements of Heathrow Airport. Additional wording to SP1 proposed as per original submission.</p>	Previously commented on.
Home Builders Federation (HBF)			SP1	Amend	<p>Reiterates objection to the lack of policy to deal with review of Green Belt.</p>	Previously commented on.
Jockey Club Racecourses			SP1	New	<p>Policy is not sufficiently flexible to enable it to deal with changing circumstances. Policy will not deliver enough units over plan period and relies heavily on unidentified windfall sites.</p>	Housing provision can be met.
Carter Planning Ltd			SP1	New	<p>Extent of urban area should be reviewed. Policy conflicts with PPS 25.</p>	Disagree.
Carter Planning Ltd			SP1	New	<p>Comment relates to Policy LO1, that it should refer to 'very special circumstances'. (N.B. Policy LO1 is no longer included in the readvertised DPD).</p>	Saved Local Plan Policy GB1 not part of the DPD.
Mr Terence Tilby			SP1	New	<p>Opportunity should have been taken to review Green Belt boundaries to allow for allocation as necessary.</p>	No need to review Green Belt.
Mr Wayne Michaels			SP1	New	<p>New development can occur outside the urban area on its periphery where there is existing sustainable development.</p>	Green Belt should only be released in exceptional circumstances – these do not exist.

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Notcutts Ltd			SP1	New	Core Strategy should consider whether some Green Belt sites may offer a more sustainable and deliverable solution for future growth than sites in the urban area. Core Strategy should be amended to allow a review of the inner Green Belt boundaries.	No exceptional case to release Green Belt land.
Jockey Club Racecourses			LO2	New	Policy duplicates national guidance but requirement to seek an increase in flood storage capacity of 20% is onerous and exceeds national guidance.	Policy has been appropriately drafted to reflect local circumstances.
Mr John Carruthers			LO2	New	The policy does not take account of the Environment Agency's Lower Thames Strategy which will reduce the flood areas. As a result 38% of new housing does not need to be targeted in Ashford.	There are no firm proposals for a major flood relief and any possible benefits should not be anticipated in advance of it being implemented.
Carter Planning Ltd			LO2	New	Policy does not conform to PPS 25 and is unduly prescriptive. Requirement for 20% flood storage has no basis.	Disagree.
Tesco Stores Ltd			LO2	New	Threshold for providing a Flood Risk Assessment in Zone 1 does not comply with national guidance. Threshold should be 1ha for development in flood Zone 1.	Lower threshold appropriate given the degree of flood risk in Spelthorne.
Congregation of the Sisters of Charity of St Paul The Apostle	CHAP	6 Table 2		Amend	Sites under construction should be deleted from supply figures as these form part of previous local plan provision.	Sites under construction properly contributed to requirements for additional housing between 2006 and 2026.
Cllr S A Dunn/Mr B H Ward	CHAP	6		New	Requests new housing policies. Considers that infill development of brownfield residential gardens enables high density accommodation which is destroying the locality and placing strain on infrastructure, natural drainage and local services.	Policy EN1 and other requirements of the DPD properly control new development.
GEMEX			SP2	Amend	The evidence base does not take account of the emerging requirements for housing set out in the Draft South East Plan nor is the DPD drafted to be flexible to deal with emerging requirements for housing provision.	Disagree. Housing Land Availability Update 2008 sets out the latest figures.
Crane Road Properties			SP2	Amend	Policy should include provision for a small scale review of the Green Belt.	No exceptional case to review the Green Belt.

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Jockey Club Racecourses			SP2	New	Policy does not conform to National Planning Policies and does not consider housing requirement for longer term development. It places too much reliance on unidentified sites. Some identified sites are within flood zones 2/3a and cannot be relied on to be developable and deliverable and the HLAA does not identify sufficient numbers of dwellings. There should be a commitment to a Green Belt review.	Housing requirements can be met and there is no case to review the Green Belt.
Mr John Carruthers			SP2	New	There is a serious over provision of housing with too much housing supply. There should be a moratorium on new housing until 2016, but the plan fails to limit supply.	Disagree.
Mr Wayne Michaels			SP2	New	Housing numbers are likely to increase through the South East Plan. The strategy relies on too few sites with uncertain deliverability.	Disagree that there are insufficient sites.
Notcutts Ltd			SP2	New	Provision of 151 dwellings per annum is prematurely set as SE Plan figures have not yet been finalised. Reliance on windfalls for approximately 50% of future housing supply is contrary to PPS 3. Policy should be amended to take account of possible higher housing requirements in finalised SE Plan and should allow further sites in Green Belt to be identified.	South East Plan requirements can be met and there is no need to review the Green Belt.
Jockey Club Racecourses			HO1	New	Policy is inconsistent with National Policy. It places too much reliance on windfall sites and development within flood zone 3a. Assessment of 11 years supply is incorrect.	
Mr Wayne Michaels			HO1	New	Housing numbers are likely to increase through the South East Plan. The strategy relies on too few sites with uncertain deliverability. Sustainable brownfield sites in the Green Belt should have been included.	
Notcutts Ltd			HO1	New	Policy does not provide sufficient scope to deal with changing circumstances within and beyond plan period. Policy should encourage development of brownfield sites in Green Belt.	

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CEMEX			HO2	Amend	The evidence base does not take account of the emerging requirements for housing set out in the Draft South East Plan nor is the DPD drafted to be flexible to deal with emerging requirements for housing provision.	South East Plan requirements can be met and there is no need to review the Green Belt.
Congregation of the Sisters of Charity of St Paul The Apostle			HO2	Amend	There should be a numerical allowance for a contingency in the event that housing figures are not met or some allocations do not come forward. Requirements should be seen as a minimum rather than a target.	The Housing Land Availability Update 2008 does show sufficient flexibility to meet requirements.
Crane Road Properties			HO2	Amend	Policy should include provision for a small scale review of the Green Belt.	Disagree.
Home Builders Federation (HBF)			HO2	Amend	Confirms previous view that there is a lack of policy to deal with contingency in housing provision.	Disagree.
Jockey Club Racecourses			HO2	New	Policy is contrary to national guidance in PPS 3. It is not flexible enough to deal with changing circumstances. Policy should reflect national thresholds rather than locally adopted thresholds which cause confusion for developers.	Disagree.
Mr Wayne Michaels			HO2	New	The Plan does not meet its housing requirements under Policy HO1 and will not be able to provide a contingency. Policy would not be required if adequate housing provided at outset.	Disagree.
Notcutts Ltd			HO2	New	Statement that housing requirements can be met without releasing Green Belt land is flawed. Minor amendments to Green Belt boundary would not be out of conformity with Strategic Planning Policy. Because of constraints on development in urban areas the contingency policy in HO2 will be insufficient if it does not allow for the development of brownfield sites in the inner Green Belt.	Disagree.
Congregation of the Sisters of Charity of St Paul The Apostle			HO3	Amend	There is no reference of any target figure for the provision of affordable housing and no opportunity to promote 100% affordable housing sites.	The target is stated in the first sentence of the policy. 100% schemes can be brought forward – see sub-point (b).

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Cllr Ian Beardsmore			HO3	Amend	Policy of negotiating a financial contribution for affordable housing from developments of 4 to 9 dwellings needs to be clarified and made more transparent.	It is already clear the basis on which the contributions are required.
Mansard Homes Ltd			HO3	New	Seeks deletion of criterion (c) in policy. There appears to be no proper justification or rationale behind the approach to seek a financial contribution of a third enhanced site value on developments of 4-9 units.	See evidence base for justification.
Mr John Carruthers			HO3	New	The definition of 'affordable' is unclear. The term should be removed and replaced with one that is clear and concise.	Disagree.
Mr Wayne Michaels			HO3	New	40% minimum affordable requirement makes housing development unviable with proposed thresholds. National threshold of 15 units preferred.	Disagree – see evidence base.
Tesco Stores Ltd			HO3	New	Insufficient evidence to justify seeking a financial contribution towards provision of affordable housing from development schemes involving more than 1000sq metres of floorspace that increases employment in the Borough. Approach is not robust and additional need for affordable housing should be met from housing schemes before seeking contributions from non-residential schemes.	Disagree – see evidence base and South East Plan and Panel's report.
Congregation of the Sisters of Charity of St Paul The Apostle			HO4	Amend	There is no identified figure of need for the elderly in the Plan period. The 400 units of 'extra care' may not provide the 'nursing care' requirements for the Borough.	The scale of the growth in elderly population is set out in the evidence base. Actual provision against need will require monitoring over the plan period.
Cllr Ian Beardsmore			HO4	Amend	Policy should be revised to require 40% as 1 and 2 bed units, 20% as 2 bed units with private amenity space and 40% of units to be 3 or more bed with own private amenity space.	Contrary to the evidence of what is actually required.
Mr John Carruthers			HO4	New	Policy does not provide for the type of development people actually want. The emphasis should be on normal houses with gardens. It would be more appropriate to greatly increase the number of extra care places to be provided.	Disagree.

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Cllr Lawrence Nichols			HO4	New	Policy is distorting developments, forcing the building of flats for all developments above 4 units. The policy should be replaced by a more flexible one which recognises the character of different parts of the Borough.	The intention of the policy is to ensure that the type of units needed are provided.
Cllr Caroline Nichols			HO4	New/Amend	Policy does not comply with homes 'Fit for Life'; one bed homes should be restricted to extra-care homes only. Sites over 0.4 hectares should be considered first for extra care housing and density of such housing should not exceed 75dph.	Policy does not conflict with design standards neither is there justification to limit one bed units only to the elderly. Density should relate to circumstances of the site.
Notcutts Ltd			HO4	New	Development of many sites will be in the form of flats/apartments. Flats are not appropriate for young families; this type of accommodation is not popular and therefore more sites are needed for development of housing to meet sustainability objectives.	The amount of new build in relation to the existing stock is limited and there is always a wide choice of properties on the market.
Green Street Action Group			HO5	Amend	Policy is unacceptable because it imposes unnecessarily high densities which lead to the degradation of neighbourhoods.	Disagree.
Cllr Lawrence Nichols			HO5	New	Policy should be clarified and strengthened so that density limits are unambiguous.	Policy provides sufficient clarity.
Staines Town Society			HO5	Amend	There should be an upper limit on housing density in Staines Town Centre to avoid town cramming and unacceptable levels of congestion, access problems, air pollution and pressure on infrastructure.	In high density town centre sites the appropriate density limit will be the product of the constraints and application of design policies to the specific site.
Staines Town Society			HO6	Amend	Green Belt is precious and under constant threat. Green Belt boundaries must be seen to be permanent to avoid blight.	Noted.
Cllr Tony Crabb	CHAP	7		Amend	Plan makes no mention of the impact of the growth of teleworking. There will be more empty offices and the plan should allow their conversion to residential. Sunbury Cross should no longer be a designated Employment Area so as to allow the possibility of more housing to relieve pressure on back garden development.	Largely repeats previous representation.

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Tesco Stores Ltd	PARA	7.10		New	Reference to retail use only being allowed in existing retail centres is inconsistent with Policy TC5 and PPS 4, and should be deleted.	This accords with the strategy of the Plan.
Mr John Carruthers			SP3	New	The plan does not provide sufficient safeguards for small commercial units to continue and actively encourages the loss of poorly located employment land to housing.	Plan protects all the major employment sites.
Henry Streeter (Sand And Ballast) Ltd			SP3	New	Para 7.7: Plan fails to provide sufficient degree of flexibility to allow for potential shortfall in the amount of land available to serve the needs of Heathrow particularly off-airport parking.	Disagree.
The Pinewood Studios Group			EM1	Amend	Support plan overall but considers wording should be tested to ensure sufficient flexibility to meet future land use requirements.	Disagree.
Green Street Action Group			EM1	Amend	Para 12.19: Problem of empty office space should be addressed by finding alternative uses for these empty buildings.	Need to maintain a stock of employment floorspace.
Insight Property Developments Ltd			EM1	New	Employment Area of Ashford Town Centre should have been re-assessed. Site is inappropriate for employment or retail use but is suitable for mixed use or housing.	Disagree.
Wraysbury International Ltd			EM1	New	A policy which seeks to refuse development proposals that involve a net loss of employment land is misguided. Approach to resist loss of floorspace is sound, but there are circumstances where a mixed use approach would be more appropriate.	Sub-point (c) of the policy on employment loss is suitably qualified.

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Robert Brett & Sons			EM1	Amend	Proposes that the employment area at Shepperton Quarry, Littleton Lane be identified as a Strategic site for Employment. Suggests such developed areas in the Green Belt are recognized in PPG 2 Annex C as major developed sites. (N.B. site previously advertised as an Alternative Site Allocation in September 2007).	The future of the non-minerals related buildings on this site is covered by a legal agreement associated with permission for gravel extraction, and the minerals related buildings are covered by conditions to remove them in due course on cessation of mineral working. Designation of the site would create a policy presumption in favour of employment development on land that, under the terms of the agreement, would become open. The site is also within the 1 in 20 flood risk area and would have flowing water across much of the site in times of flood. Designation of the site and preventing much of it becoming open land as currently agreed would add to flood risk in the area over and above what will otherwise arise in due course. This would be contrary to the Council's flood policy which seeks to avoid development on open land at flood risk and be development that is unsustainable and therefore unsound.
Tesco Stores Ltd	PARA	8.8		New	Replace last sentence of paragraph to indicate that retail provision in other centres must be assessed against tests of PPS 6 and Policy TC5 of plan.	The comment does not demonstrate why the factual finding to which the last sentence refers is wrong.
Staines Town Society			TC1	New	Policy should not allow greater provision for long stay parking as this will encourage people to drive rather than using more sustainable travel modes.	Policy seeks to limit provision for long stay parking.
Insight Property Developments Ltd			TC3	New	Representation relates to 2-12 Clarendon Road, Ashford. Document is not clear whether the Employment Areas are the same as commercial areas. Application of employment and shopping policies to site is no longer appropriate. Boundaries should be moved.	Term commercial areas not used now. Site appropriately designated on the Proposals Map.
Wraysbury International Ltd			TC3	New	Representation relates to Datascience House, Staines Road West, Sunbury. Considers that reference to retaining the "existing amount of floorspace" should be removed to allow more appropriate consideration of a mixed use approach in town centre locations.	Site in Sunbury employment area and retention of employment floorspace necessary to maintain the Borough's stock.

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Mr John Carruthers			TC5	New	Policy concentrates all new retail development in existing centres but the localised need for corner shops and minor shopping parades will not be provided for.	Covered by Policy TC4.
Staines Town Society			TC5	New	Policy should not permit expansion and modernisation of existing out of town retail facilities as they generate more car-travel and attendant emissions.	Issue covered in sub-point (d).
Green Street Action Group	CHAP	9		Amend	Necessary infrastructure improvements have not been identified such as the need to widen Green Street bridge and the need to provide adequate surface drainage across the Borough.	Surface water drainage considered in SFRA. Widening Green Street bridge is not a scheme identified by Surrey County Council.
Tesco Stores Ltd	PARA	9.6		New	No objection but section should be updated to include details of Community Infrastructure Levy.	Details of how such a scheme might operate have not been finalised.
Cllr Caroline Nichols			SP5	New/Amend	Add to policy: 'All developments will be expected to contribute to social housing and infrastructure funds'.	Already covered as appropriate in Policy HO3 and CO2.
Jockey Club Racecourses			CO2	New	Policy does not conform to National Planning Policy concerning infrastructure provision. Local Authorities should set out in advance when supporting infrastructure will be required and the relationship between it and the contribution sought. Contribution must be fairly and reasonably related in scale and kind to proposed development.	Amended text in readvertised version of DPD clarifies this point along with the commentary already given.
Cllr Lawrence Nichols			CO3	New	Policy should be amended to require amenity space for all developments above a defined size.	Second paragraph covers this.
Staines Town Society			CO3	Replace	Policy should require public open space to be provided on site for all developments of 30 units and above whether family or non-family. Housing for the elderly should also be included. High density flat developments require adequate public open space for all.	Second paragraph covers this.

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Cllr Caroline Nichols	CHAP	10		New/Amend	Add to para 10.7: 'All drawings must be to scale and must include dimensions'. Add new paragraph to introduce the use of 'Design Panels' for considering design merits of planning applications. There should be a presumption against infill developments at the head of cul-de-sacs and against gated developments.	Detail relating to drawings not a matter for DPD. Design Panel issue not appropriate to DPD - which should focus on policies against which developments will be considered rather than the internal processes a Council may employ to assess specific applications.
CEMEX	CHAP	10		Amend	Considers the wider area around the CEMEX Shepperton site should be allocated as an area of degraded landscape, as previously identified in the Local Plan Proposals Map (2001), and Local Plan Policy R3 should be included in the DPD.	Policy EN8 provides a basis for any degraded land to be enhanced, but designation of the Shepperton Site appears to be intended simply to justify its development for housing contrary to Green Belt policy.
Cllr Ian Beardsmore			SP6	Amend	Updates original objection to this policy by proposing all new residential development to achieve at least Code for Sustainable Homes 3 star rating and all non residential development will be to BREEAM 'very good' standard.	Already required by Policy CC1.
Green Street Action Group			EN1	Amend	Policy does not go far enough in ensuring high standards of design.	Policy provides a sound basis for securing good design and will be supported in due course by supplementary guidance.
Jockey Club Racecourses			EN1	New	Supports broad aim of policy but wording is too prescriptive and does not provide flexibility to reflect changing circumstances.	Disagree.
Mr John Carruthers			EN1	New	There is no guidance in the Plan to limit the heights of new buildings.	Can be covered under sub-point (a).
Mr Lawrence Nichols			EN1	New	The policy contains no definition of quality or indication of what criteria might be appropriate. The policy fails to provide protection to the local character of areas or to enforce any level of design consistency.	Policy sets out appropriate criteria but will be supported by supplementary guidance in due course.
Notcutts Ltd			EN1	New	High standards of design are essential. Sites identified in Allocations DPD will have problems achieving design standards. Search for alternative allocations should be extended to identify sites where high quality living standards can be achieved.	Disagree.

Spelthorne Re-Advertised Core Strategy and Policies DPD – Summary of Representations

Respondent	Doc Part	Part No	Policy	New/Amend/ Replace/ Prev. Invalid/ Withdrawn	Summary of Representation	Response
Carter Planning Ltd			EN3	New	The requirement for an air quality assessment to be submitted with a planning application needs to be more clearly defined.	Policy is clear on where an air quality assessment is required.
Staines Town Society			EN3	Amend	Policy should contain a moratorium on all forms of additional development in areas which are unlikely to meet air quality standards.	Each case needs to be assessed on its merits in relation to the particular site and circumstances at the time.
Tesco Stores Ltd			EN3	New	Support in principle but amend criteria for the submission of an Air Quality Assessment so that it more directly relates to air quality.	Criteria considered appropriate.
Mrs Caroline Nichols			EN4	New/Amend	Application of policy should require public notification and consultation as soon as exploratory talks are undertaken which could involve the loss of designated urban open space.	The objection is seeking to insert a requirement in the DPD that the Council divulge the details of confidential pre-application discussions it may have on specific sites. The Council strongly opposes this on the grounds that the giving of such advice enables applicants to receive early informal guidance and has a positive role to play in securing delivery of appropriate development.
Green Street Action Group			EN6	Amend	Para 10.28: To prevent the loss of important residential areas the Conservation policy should be revised to identify housing estates considered as desirable, extending and creating new conservation areas, creating a specific policy to preserve gardens and revising the housing strategy.	PPG 15 sets out guidance on the designation of conservation areas and does not need repeating, and departure from it has not been justified. Preserving gardens per set is contrary to PPS3 and making the best use of urban land.
Staines Town Society			EN13	Amend	Comment also applies to Policy EN3. The strategy does not deal adequately with the impact of Heathrow Airport and the consequent noise, congestion and air pollution on the health and quality of life of Spelthorne residents. Plan should contain stronger policies resisting expansion of Heathrow; land should not be allocated for airport related employment.	Policy EN13 deals with noise issues. A general policy objecting to the principle of expanding Heathrow would be contrary to the Airports White Paper.
Carter Planning Ltd			EN16	New	The circumstances for when a requirement for a contamination report to be submitted with a planning application needs more detailed definition.	It is considered the policy is sufficiently clear, but prospective developers will always need to check these and a range of other issues when contemplating the development of a site.

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Cllr Caroline Nichols	CHAP	11		New/Amend	All council sponsored developments and those sold by other public agencies to achieve maximum sustainability score, Code for Sustainable Home 6 star rating, and all other homes at least 4 star. The Council should commit to developing a series of cycleways in conjunction with Sustrans and adjacent councils.	Policy CC1 already refers to minimum requirements and allows for the government's policy to increase the standards. The issue of cycleways is in effect covered in Policy CC2 (a) but is an issue on which Surrey County Council have a lead role.
Jockey Club Racecourses			CC1	New	Supports emphasis on sustainable development, but basing policy on BREEAM is too prescriptive and does not provide flexibility to reflect changing circumstances.	BREEAM is an appropriate recognized standard.
Tesco Stores Ltd			CC1	New	Consider that part (ii) of policy should relate to residential development only and that there should be a more general reference to non-residential development.	This would be contrary to government expectation that all new development should comply.
Cllr Lawrence Nichols			CC2	New	Policy should be strengthened to require demonstration of compliance with the renewable energy standards when applications are considered.	Objection seeks to avoid requirements being made by planning condition. This is appropriate in many cases.
Carter Planning Ltd			CC2	New	The requirement for the submission of a travel plan with a planning application needs more detailed definition. 'Major' development should be defined.	Major development is defined in national guidance on planning applications.
Staines Town Society			CC2	Amend	Strategy does not deal appropriately with traffic congestion in Staines Town Centre. It does not preclude further traffic generating development. Plan should restrain traffic generating development to reduce its environmental impact.	Policy TC1 (b) deals with traffic in Staines. Staines is, however, a sustainable location for major development and such schemes are appropriate.
Cllr S A Dunn/Mr B H Ward			CC3	New	Overdevelopment leads to an increase in street parking. New high density development never has adequate off-street parking.	Appropriate parking standards exist. No evidence to support assertion.
Cllr Lawrence Nichols			CC3	New	Policy is not being applied to ensure 'appropriate provision' of off-street parking.	Disagree.
Mr Ian Kelly			CC4	New	Supports safeguarding the Airtrack route for improved public transport access to Heathrow.	Noted.
Ms Sarah Glencrose			CC4	New	Objects to safeguarding of Airtrack route on grounds of noise pollution, air quality, increased traffic and effect on environment of Moormede Park.	Noted.

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Green Street Action Group	CHAP	12		Amend	Traffic congestion in the Borough has been exacerbated by new development in or near traffic sensitive streets and needs to be addressed by a policy to inhibit such development, a more generous car parking policy and a programme of roadworks to relieve or by-pass recognised congestion blackspots.	Providing more parking than currently would encourage greater car use. The plan reflects national policy of tackling congestion by promoting sustainable travel.
Green Street Action Group	CHAP	13		Amend	Absence of community involvement in preparation of monitoring report.	This is a factual process and public consultation is not required.
Tesco Stores Ltd	CHAP	13		New	Target for "100% of new retail development to be located within existing town centres" is inappropriate and inconsistent with PPS 6 and Policy TC5. Target should be removed.	Complies with the strategy of the Plan.
Insight Property Developments Ltd		Map		New	Commercial and residential boundaries should be re-aligned to exclude 2-12 Clarendon Road from Employment Area.	Disagree. Boundaries appropriately drawn.
Mr Wayne Michaels		Map		New	Green Belt boundaries should have been reviewed.	Disagree.
Notcutts Ltd		Map		New	Proposals Map should be altered to allow for small scale review of the Green Belt around inner boundaries.	Disagree.
Tesco Stores Ltd		Map		New	Tesco site at Sunbury Cross should be included in both the Shopping Area boundary and the designated Employment Area.	Disagree. The store is not part of the Sunbury Cross shopping centre and employment area. It functions broadly as a free standing entity.