

Spelthorne Development Plan

Report on

The Preferred Options Consultation

May – June 2006

on the Strategy and Policies DPD and Proposals DPD and their Sustainability Appraisal

and

Initial Consultation on SPD's for the Elmsleigh Centre Extension, Bridge Street Car Park, Affordable Housing and Development Control Policies

APRIL 2007

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Ref 16/2006



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1. Introduction

- 1.1 The purpose of this report is to set out the Council's response to representations made on a number of draft planning documents which will form part of its Local Development Framework.
- 1.2 It also includes an explanation of how the consultation was undertaken and who responded.
- 1.3 This document has been prepared to help people see how the Council is taking into account people's views in preparing the new plan for the Borough. The document is intended to meet the requirements of the Town and Country Planning (Local Development) (England) Regulations 2004 (No. 2204) Regulation 27 (3).

2. The documents the Council has consulted on

- 2.1 The Council consulted on a number of draft documents during a six week period between 4 May 2006 and 15 June 2006. These documents comprised the following:-
 - a) Development Plan Documents (DPDs):
 - i. Spelthorne Development Plan – Strategy and Policies DPD – Preferred Options.
 - ii. Spelthorne Development Plan – Proposals DPD – Preferred Options.
 - iii. The Sustainability Appraisal Report on the above two DPD's.
 - b) Supplementary Planning Documents:
 - v. Initial Draft Elmsleigh Centre Western & Southern Extension, Staines, Planning Brief.
 - vi. Initial Draft Bridge Street Car Park, Staines, Planning Brief.
- 2.2 In addition the Council also sought initial views on the content of two proposed Supplementary Planning Documents on:
 - i. Affordable Housing
 - ii. Development Control Policies

3. How the Council Consulted

- 3.1 Consultation was carried out in accordance with the procedures set out in Spelthorne's Statement of Community Involvement (SCI) (Submission Draft) (March 2006) (see Table 3 and 4 of the SCI). The following paragraphs further explain how the consultation was carried out.

Direct mail

- 3.2 A letter explaining the documents being consulted on along with a representation form and a copy of the statutory notice (or 'proposals matters' – which explained how people could participate in the consultation) was sent prior to the start of the consultation to everyone on the Council's LDF contacts list. The list includes all the

'specific' consultation bodies identified in Government planning guidance (Planning Policy Statement 12 (PPS12)) and Regulation 25 2(a)*). It also includes 'general' consultees including local amenity groups and individuals/organisations who have previously indicated an interest in being informed about the progress with the LDF. In total 612 letters were sent.

- 3.3 Copies of the DPD documents and the accompanying SA Report were enclosed with the letters to 'specific' bodies.
- 3.4 To consult on the 'Proposals DPD', separate letters were also sent to the owners/occupiers of the proposed sites and owners/occupiers of adjoining properties/or those in proximity likely to be affected by the proposals. Along with the letter a map identifying the proposed site and an extract of the relevant page from the 'Proposals DPD' explaining the justification for the inclusion of the site was enclosed.

E-mail

- 3.5 About 50 contacts on the LDF contacts list prefer to be contacted by e-mail. The e-mail sent to these contacts letting them know about the consultation included links to the documents available on the Council's website.

The Council's website

- 3.6 All the documents were available on the Council's website to view/download throughout the duration of the consultation. An electronic questionnaire to aid people's responses was also available on the website.
- 3.7 Information on the places and times where the document could be inspected was available on the website.

Statutory Notice

- 3.8 A notice of consultation on the various documents was published in The Surrey Herald series of newspapers on 3 May 2006.

Proposals Matter

- 3.9 At this stage of the plan making process, the Regulations require Local Planning Authorities to publish a brief note setting out consultation arrangements. This note covered the subject matter of the statutory notice and was sent as an enclosure with the letters and made available on the Council's website.

Borough Bulletin

- 3.10 In addition to the above consultation arrangements the special issue of the Borough Bulletin which was used for the 'Issues and Options consultation' published in September 2005 included an LDF timetable to let people know when the 'Preferred Options' consultation would take place. Further, an article on feedback on 'Issues and Options' consultation on the LDF was published in the November 2005 (circulated

* Planning and Compulsory Purchase Act 2004

from 17 November 2005) issue of the Borough Bulletin. The article also referred people to the forthcoming 'Preferred Options' consultation.

Availability of documents

- 3.11 A copy of all the documents was placed for inspection during normal opening hours in all public libraries in Spelthorne as set out in the statutory notice and 'proposals matters'. Copies were also available for inspection or to purchase at the Council's reception.

Enclosed Appendices

- 3.12 The following information in relation the consultation can be found at appendix H.
- i. List of consultees
 - i. Copies of letters sent
 - ii. Copy of statutory notice
 - iii. Copy of representation form

4. Response to the Consultation

- 4.1 In total 130 parties responded to the consultation and comprised the following. (defined in the SCI)
- 11 Statutory bodies
 - 50 Local residents
 - 34 Groups representing the interests of the community
 - 33 Groups with a direct interest in Planning issues
 - 2 People with interest in specific sites (owners/occupiers)
- 4.2 A list of all those who responded is set out at Appendix A. Each party has a reference number and a list of those parts of the schedule of responses, in Appendix B, where their particular comments are set out. Many people commented on more than one issue.

5. Response to the Representations

- 5.1 The representations are set out for each of the documents consulted on in a schedule format. Each point is summarised, often with other comments on the same issue, and a Council response is set out. The policy and paragraph referencing of the Preferred Options documents are used, with any revised numbering in the submission documents referred to in brackets.
- 5.2 The recommendation sets out the Council's agreed response to the points raised. It should be noted that some non material changes have been made in the course of the final editing of the submission documents. In addition to changes set out in this document in response to representation, other changes to the DPDs have been made by the Council to further improve the documents.
- 5.3 An overview of the comments received on each document and the Council's response is set out below:

- a) Strategy and Policies (Appendix B) – This was one of the larger documents and generated the greatest number of comments. A large number of the representations made suggestions for improvement to the expressions of the document or put forward specific issues which they wanted included. Many of these have been helpful and a number of changes proposed as a result of them. The issue which attracted the greatest comment was the Council's intention not to alter the Green Belt boundary. Whilst local people and groups supported the approach, those owning Green Belt sites did not. The Council has made clear its intention to 'save' the existing Local Plan Green Belt policy and Green Belt designation on the Local Plan Proposals Map, and does not propose to change its approach. Any detailed comments on specific Green Belt sites within this document are made without prejudice to the Council's decision to 'save' the Local Plan Green Belt designation.
- b) Proposals (Appendix C) – There were very few objections to the proposals in principle although there were comments from some local people seeking to reduce the amount of development. Many of those with interests in developing in the Green Belt sought to question the availability of housing proposals – all of which are within the existing urban area. Appendix D sets out the responses to additional proposal sites put forward.
- c) Sustainability Appraisal of the Strategy and Policies and Proposal documents (Appendix E) - There were only limited comments on the Appraisal which mostly related to representations on either specific Policies or Proposals.
- d) Elmsleigh Centre Extension and Bridge Street Car Park Briefs (Appendix F) – this received very little comment.
- e) Proposed SPDs on Affordable Housing and Development Control Policies (Appendix G) – requests for suggestions on the content of these proposed documents received very little comment.

Appendices

Appendix A	Respondents to the consultation
Appendix B	Strategy and Policies
Appendix C	Proposals
Appendix D	Additional Proposal sites put forward
Appendix E	Sustainability Appraisal
Appendix F	Elmsleigh Centre Extension and Bridge Street Car Park Briefs
Appendix G	Proposed Affordable Housing and Development Control Policy SPDs
Appendix H	Consultation

Appendix A
RESPONDENTS TO THE CONSULTATION

Ref	Name (and agent if any)	Entry references
001	Mrs R Putman	93,
002	Ms S Park	97,
003	Mr G Moore	98,
004	Mr & Mrs D King	99,
005	Showmen's Guild of Great Britain (Mrs C Hennigan)	100,
006	Showmen's Guild of Great Britain (Mr K Miller)	100,
007	Mr R Maclagan	100,
008	Mamma Mia Ristorante (Mr Fuoco & Mr Romano)	100,
009	Mr D Chamberlain & Mr M Clement	100,
010	Miss R Hyde	100,
011	Mr K Town	102,
012	Mr R Miller	102,
013	Mr J Hewitt	102,
014	Mr S Adamski	102,
015	Mrs K Smith	102,
016	Mr G Moore	103,
017	Tidegrove Ltd	103,
018	Mrs G Cook	23, 41,
019	Woking Borough Council	No comments
020	Mr R Findlay	No comments
021	Ministry of Defence	No comments
022	Disability Rights Commission	No comments

Ref	Name (and agent if any)	Entry references
023	Scottish Southern	No comments
024	Mr L Watson	100,
025	Mr A McLeod	99,
026	Thames View Properties	103,
027	Thames View Properties	103,
028	Thames View Properties	103,
029	Thames View Properties	103,
030	Thames View Properties	103,
031	Thames View Properties	103,
032	Thames View Properties	103,
033	Thames View Properties	103,
034	Thames View Properties	103,
035	Thames View Properties	103,
036	Thames View Properties	103,
037	Thames View Properties	103,
038	Thames View Properties	103,
039	Thames View Properties	103,
040	Thames View Properties	103,
041	Thames View Properties	103,
042	Thames View Properties	103,
043	Thames View Properties	103,
044	Thames View Properties	103,

Ref	Name (and agent if any)	Entry references
045	Mrs P Archer	92,
046	Mr A Gonzalez	95,
047	Mr G Maskell	94,
048	Mr P Gifford	102,
049	Mr R Hamdallah	103,
050	Mr I Brunton	98,
051	Mr P Tomlin	94,
052	Mrs J Baker	92,
053	Mr P Deschamps	117,
054	Waverley Borough Council	No comments
055	Sport England South East	5,21,22,23,24
056	Crown Golf (Terence O'Rourke)	118,
057	Mr B Thorne	94,
058	Evans Property Group (Barton Willmore)	93,
059	Cllr. I Beardsmore	24,
060	Miss D Brough	97,
061	Elmbridge Borough Council	No comments
062	Mrs V Burch	93,
063	Mr T Lyden	96,97,
064	Mr P Hughes	89,
065	Mr R George	100,
066	Thames Water Property Services	22,23,24,32,88,92,93,94,95,96,97,99,100,101,124, 125,

Ref	Name (and agent if any)	Entry references
067	Spelthorne Museum	134,
068	Highways Agency	1,3,4,5,6,7,16,17,18,19,20,21,22,33,39,41,67,78,83,133,
069	TASHA Foundation	108,
070	Ms C Baxter	92,
071	Mr M Gillies	94,
072	Mr W Archer	102,
073	English Nature (now Natural England)	6,24,28,49,69,81,
074	Notcutts Ltd	1,8,11,33,34,51,92,95,96,97,98,100,111,126,
075	Mrs R Allen	102,
076	Mr B Leney	98,
077	Elmsleigh Developments Limited (Savills)	101,134,
078	Surrey County Council (Estates) (Turley Associates)	2,9,120,
079	Fairview Homes (Hepher Dixon)	1,106,
080	Cemex (Cluttons LLP)	1,2,8,9,15,22,35,92,94,95,96,97,98,102,112,
081	The British Wind Energy Association	38,
082	Environment Agency (Ms C Amor)	1,2,4,5,6,7,8,30,32,37,52,53,57,65,66,80,134,135,
083	Arlington Property Investors (Tribal MJP)	4,17,68,134,
084	Countryside Agency	24,38
085	London Irish Holdings Limited (RPS Planning)	2,6,11,121,
086	BAA Heathrow	43,61,71,72,73,76,
087	Staines Town Society (Mrs C Curtis-Jenkins)	1,6,8,10,11,12,14,17,20,21,23,25,26,30,32,33,35,36,39,91,96,97,101,
088	Mr & Mrs V Davies	96,97,100,101,

Ref	Name (and agent if any)	Entry references
089	Mobile Operators Association (MOA) (Mono Consultants Ltd)	87,
090	Tidegrove (CB Richard Ellis Ltd)	10,14,17
091	Ms H George	42,
092	Staines Preparatory School	96,97,
093	Surrey County Council	1,2,3,4,5,6,7,8,9,10,11,12,13,17,18,20,23,24, 28,30,32,38,40,41,42,44,48,52,54,55,56,58,59, 71,73,74,75,76,77,84,101,103,
094	SEERA	6,7,8,24,38,42,64,82,
095	GOSE	2,9,10,12
096	Ms B Sheehan	8,10,14,16,67,
097	Trustees of the Sisters of St.Paul (Bigwood Chartered Surveyors)	24
098	Mr J Hobbs	103,
099	Miss M Cooksey	92,
100	Mr P Colfer	93,
101	Mr P Ridley	102,
102	Mr J Watts	98,103,
103	Mrs L Mutton	97,
104	St. Davids School (Barton Willmore)	104,
105	Surrey Wildlife Trust	28,86,90,137,
106	Fairview New Homes Ltd. (RPS Planning)	10,38,
107	Dr Hair's Proprietaries Ltd / Halewood Chemicals (Nicholas P Taylor)	79,122,
108	Europa Business Consultancy (UK) (Sigma Planning Services)	1,2,3,6,9,10,22,28,32,92,95,96,97,98,99,100,101, 113,127,128,129,130,131,132,134,135,
109	Surrey Police	4,8,23,36,41,134,

Ref	Name (and agent if any)	Entry references
110	Strodes Foundation	109,
111	Persimmon Homes (Boyer Planning Ltd)	110,
112	Mr R Butler	94,
113	Cemex UK Materials Limited (Drivers Jonas)	114,
114	Rugby Estates Plc (CB Richard Ellis Ltd)	8,10,14,15,60,98,
115	Galliard Homes Ltd (Turley Associates)	15,115,
116	The Theatres Trust	20,138,
117	Robert Brett & Sons Ltd	67,
118	Lower Sunbury Residents Association	1,2,8,20,23,24,26,28,32,33,40,89,
119	Ashford Sports Club (Boyer Planning Ltd)	1,2,3,8,92,93,94,95,96,97,98,99,100,101,113,116,
120	Crane Road Properties (Boyer Planning Ltd)	1,2,3,8,9,92,93,94,95,96,97,98,99,100,101,
121	Mrs A Ward	93,
122	HSBC Bank Pension Trust (UK) Ltd (Broadway Malyan)	107,135,
123	Racecourse Holdings Trust Ltd (Barton Willmore)	105,
124	Green Street Action Group	1,2,4,6,7,8,9,11,14,27,28,31,32,33,40,42,45,46, 47,50,62,63,70,84,85,
125	RSPB	29,42,
126	Mr D Heaton	96,
127	Owner Occupier (8 Thames Edge)	100,
128	Landowner – Land at Southern Farm, Horton Road, Stanwell Moor (Development Planning Partnership)	119,
129	Showmen's Guild of Great Britain (Mr G Irvin)	13
130	Network Rail	96,123,

Appendix B (i)
STRATEGIC POLICIES

Representation	Response
<p data-bbox="219 240 833 272">1 Policy CS1 – Location of Development</p> <p data-bbox="293 309 1171 746">Notcutts (74), Fairview Homes (79), Cemex (80), Europa Business Services (108), Ashford Sports Club (119) and Crane Road Properties (120) object to the policy because it seeks to retain the Green Belt without alteration. Some suggest more flexible wording to allow some sites or areas to be considered. Notcutts (74) specifically suggest allowing redevelopment of ‘brownfield’ sites in the Green Belt. Staines Town Society (87), Surrey County Council (93), Highways Agency (68), Lower Sunbury Residents Association (118) and Green Street Action Group (124) support the approach to the Green Belt and the focus of development on the urban area. Europa Business Services (108) consider that the reference to flooding does not comply with national policy and the Environment Agency (82) set out a reminder of what national policy is.</p>	<p data-bbox="1205 240 2045 644">This is a strategic policy and more detailed policies give further guidance on the Green Belt and flooding. This policy is intended to set out where development should go. It reflects national policy on the permanence of the Green Belt for which the emerging South East Plan and adopted Structure Plan make no local proposal for alteration. It also reflects the Council’s intention to save the Local Plan Green Belt policy and designation of its boundary. Wording which weakens the strength of the Council’s consequent approach would be inappropriate. This key policy has been prepared in the context of national Green Belt policy and evidence of the Council’s ability to meet development needs from within the urban area.</p> <p data-bbox="1205 683 2011 778">Some rephrasing to improve clarity is proposed to tie in with other changes in employment policy but none are proposed in response to these particular points.</p> <p data-bbox="1205 817 2033 880">Recommend: The policy (now numbered SP1) be amended as follows:</p> <p data-bbox="1205 887 2045 1050">The extent of the existing urban area will be maintained and provision for all new development will be made within it. Existing residential areas will be maintained and in new residential development will only be allowed in Flood Zone 1 and 2.</p> <p data-bbox="1205 1088 2045 1289">The overall amount of employment development will be maintained. Larger well sited employment areas will be retained and increases in employment development accommodated in those locations, and particularly Staines town centre. Poorly sited employment uses in residential areas will be redeveloped for housing.</p> <p data-bbox="1205 1327 1966 1385">Existing retail centres will be protected to meet future retail needs.</p>

Representation

Response

	Representation	Response
2	<p>Policy CS2 – Housing Provision</p> <p>Surrey County Council (93), GOSE (95) and Cemex (80) say the housing figures should accord with the Structure Plan requirements which are higher than 151 per annum in the draft South East Plan.</p> <p>Ashford Sports Club (119), Crane Road Properties (120) and London Irish (85) consider that the housing provision should not be based on the draft South East Plan as this is being objected to by the building industry as insufficient. Surrey County Council Estates (78) object that Green Belt sites are not taken into account in the proposed housing provision. Europa Business Services (108) consider reference to tenure types should be deleted. The Environment Agency (82) considers reference should be made to steering residential development away from flood risk areas. Lower Sunbury Residents Association (118) and Green Street Action Group (124) consider the housing provision too high and as a result does not contribute to making Spelthorne ‘safe’, ‘healthy’ or ‘sustainable’.</p>	<p>Major traffic generating development will be located where it is accessible by a choice of modes of transport.</p> <p>This policy refers to building 151 dwellings per annum which is the figure on the draft South East Plan. The Surrey Structure Plan requires 2580 dwellings to be built between 2001 and 2016, it makes no specific annual requirement. 1292 dwellings were built in the period 2001-2006 leaving a balance of 1288, or an average of 128 per annum, for the remaining period to 2016. The Council’s use of the higher draft South East Plan figure is considered the most appropriate. Those suggesting a higher figure do not suggest what it should be or justify how the Council’s LDF can ignore guidance in higher order plans. The Surrey County Council Estates (78) objection does not accord with either the Surrey Structure Plan or the draft South East Plan. The Environment Agency (82) comments are dealt with in the context of the detailed flood policy.</p> <p>The Council is not in a position to promote a housing figure lower than that in strategic guidance.</p> <p>The policy refers to a specific percentage of affordable housing to reflect the requirements in the draft South East Plan. Meeting housing needs contributes to a healthy and sustainable community overall.</p> <p>Recommend: No change to the policy</p>
3	<p>Policy CS3 – Economy and Employment Land Provision</p> <p>Surrey County Council (93) supports the policy. The Highways Agency (68) supports the safeguarding of employment opportunities in town centres. Cemex (108) consider the policy too restrictive, say it ignores opportunities to significantly enhance the economy and that it fails to take a realistic view of the long term growth of Heathrow – with too much reliance on the T5 decision. Ashford Sports Club (120) and Crane Road Properties (119) consider there are labour shortages, that more housing sites are needed and that these should be included on inappropriately sited commercial sites,</p>	<p>The policy is based on evidence from an assessment of the economy and employment land. It seeks to safeguard appropriate employment land which is well sited but also accepts the loss of some inappropriate sites to residential use. The plan seeks to strike the right balance between maintaining the economy, including account of major employment commitments such as T5, and the need for housing. The Council is satisfied the plan as a whole has got the balance right.</p> <p>Both this policy CS3 (now SP3) and also policies CS1, EM1,</p>

	Representation	Response
	<p>particularly those close to the airport.</p>	<p>EM2 and TC1, deal with various strategic and detailed aspects of the Council’s approach to the Economy and Employment land provision. It is recognised, partly in response to comments in Policy EM1, greater clarity is needed about the intention to maintain an appropriate employment base for the Borough as well as clarify some potential confusion by employment areas in town centres being referred to as commercial areas. There is also some unnecessary repetition between employment policies and Policy TC1.</p> <p>As a result Policy CS3 is proposed to be rephrased to make its intentions clearer and consequential changes to policies CS1, EM1, EM2 and TC1 follow as well as a number of further consequential changes to lower case text. Some changes also take on board some of the more detailed points referred to later on under those policies. For the sake of brevity not all of the minor consequential changes are recorded in this report.</p> <p>Recommend:</p> <ul style="list-style-type: none"> a) Policy CS3 (now referred to as SP3) be amended as follows: Policy CS3: Economy and Employment Land Provision The Council will maintain the employment capacity of the Spelthorne economy by maintaining well sited larger employment areas and supporting the renewal and improvement of employment floor space to meet needs. It will support initiatives to improve the skills of the local workforce. b) Consequential changes be made to policies CS1, EM1, EM2 and TC2 and to lower case text.
4	<p>Policy CS4 – Town Centres and Retail Development</p> <p>The policy is supported by Arlington Property Investors (83), Surrey</p>	<p>There is support for the policy with just a few suggested additions. The issue of assessing the impact of out-of-centre stores such as Tesco’s is already covered in Policy TC5. The</p>

Representation**Response**

	<p>County Council (93) and the Highways Agency (68). Surrey Police (109) request commitment be added in the policy to seek improvements to access to Staines town centre by non-car modes giving particular emphasis to public transport to support the evening / late night economy which could reduce crime and anti-social behaviour. The Environment Agency (82) support the policy to focus development in town centres but say this should not conflict with flood policy and that development should reflect a sequential approach. Green Street Action Group (124) consider Tesco at Sunbury Cross an 'out of town' centre whose growth should be contained, as it is a threat to other traders, and say the policy could reflect this.</p>	<p>need for public transport, particularly in the late evening, is a matter better dealt with through the Local Transport Plan.</p> <p>It is recognised that Staines is a major retail centre but also partly in a flood risk area. Any general presumption of avoiding flood risk areas needs to be balanced with the reality that existing centres will be the most accessible and the most sustainable for further development. The approach to flooding follows the requirements of PPS25.</p> <p>Recommend: No change to Policy CS4 (now SP4) but amend Policy CC2, and combine with CC3, to give clearer emphasis to sustainable travel.</p>
5	<p>Policy CS5 – Meeting community needs</p> <p>The Highways Agency (68), Sport England (55) and Surrey County Council (93) support the policy but Sport England ask that the second sentence have the following addition to the end of the first paragraph "or ensure adequate replacement is provided". Surrey County Council add that acknowledgement should be given to the fact that even small developments should be required to contribute to community needs as these are often ignored. The Environment Agency (82) note that environmental improvements often have community benefits.</p>	<p>It is agreed that the second sentence could helpfully be amended in the way Sport England suggested. The point raised by the Environment Agency is noted but it is considered the Core Strategy does not need to include this observation.</p> <p>The point raised by Surrey County Council about acknowledgement of the requirement for developer contributions to meet community needs is partly addressed in paragraph 9.4 and contributions to meet affordable housing, open space and transport are covered respectively in policies HO3, CO2 and CC2. However, it is recognised that a specific policy on the need for developers to provide or contribute generally to the cost of infrastructure required as a result of development they bring forward would be helpful in giving clarity to what is required and provide the basis for supplementary planning advice which the Council intends to prepare as part of its intended Supplementary Planning Document on Development Control Policies.</p> <p>Recommend:</p> <ol style="list-style-type: none"> a) Adding the following to the second sentence "or ensure adequate replacement is provided". b) Adding a new section and policy after Policy CO2 as

	Representation	Response
		<p>follows:</p> <p>Infrastructure Required by New Development</p> <p>Some types of development can require additional ‘infrastructure’. This can range from community facilities, open space, transport related and physical services such as sewerage disposal. Where development may lead to needs outside the application site the developer will be expected to assess these. Where requirements are demonstrated to be essential for the development to proceed the provision of that ‘infrastructure’ will be required to be provided or as appropriate contributions made to their cost. Developers will be expected to enter into appropriate legal agreements. The Council intends to provide further guidance on the following Policy in its proposed Supplementary Planning Document on Development Control Policies.</p> <p>Policy CO2 – Provision of Infrastructure for New Development</p> <p>The Council will require developers to provide or contribute in a timely way to the cost of infrastructure required as a result of any development they bring forward.</p>
<p>6</p>	<p>Policy CS6 – Maintaining and Improving the Local Environment</p> <p>Staines Town Society (87) want specific reference to “listed buildings” in sub-section (a) and Surrey County Council (93) want the word “archaeological” added to the same sub-section.</p> <p>Staines Town Society (87) want the policy to seek improvements to air quality generally and not just in the context of new development, the Highways Agency (68) refer to the EU Air Quality Directive for NO² by 2010 and the need for policies not to contribute to a compliance problem.</p>	<p>No one objected as such to the policy but various additions were suggested.</p> <p>This core strategy policy is intended to deal only with strategy, there are 22 environment policies (including 5 saved policies) in which further detail is set out. Some matters raised are better dealt with in the detailed policies.</p> <p>The policy already refers to the Borough’s historic and cultural heritage including historic buildings and conservation areas. Use of the phrase ‘historic buildings’ covers both ‘listed’ and locally listed buildings. Policies EN5 and EN6 deal directly with</p>

Representation**Response**

	<p>The Environment Agency (82) and English Nature (73) want specific references in sub-section (c) to biodiversity and the need for its enforcement. SEERA (94) want references to initiatives to manage and enhance the Green Belt as a multi-functional resource.</p> <p>Surrey County Council (93) want reference to the need for various agencies to work together. Europa Business Consultancy (108) want acknowledgement that landscape improvement can only come from development related schemes. London Irish (85) want a sub-clause (a) added to make it clear that open space will only be protected where it is needed. Green Street Action Group (124) want the policy to deal with the merit of setting development back from the highway to reduce exposure to poorer air quality.</p>	<p>'listed' and 'locally listed' buildings, and saved policies EN18-EN20 deal with sites of archaeological interest.</p> <p>Policy EN10, which deals with air quality, will be amended to reflect commitment to improve air quality over and above development related opportunities.</p> <p>Biodiversity is currently covered under the general phrase 'nature conservation interest' and does not limit interest only to sites which are 'diverse'. The opening section of the policy refers specifically to maintaining and improving sites and improving the environment. It is considered no change is necessary.</p> <p>Sub point (b) be amended to delete reference to 'outside urban areas' and insert 'Green Belt'. This will more clearly meet SEERAs point as the sub point will relate more clearly to enhancing the Green Belt.</p> <p>The qualification of an open space only being protected where needed is covered in Policy EN4. Nevertheless, the Council's open space study revealed no surplus of open space to justify the presumption that some space could be released.</p> <p>Green Street Action Group's (85) point on the layout of new development is a matter best dealt with by Supplementary Guidance on design policy EN3 however it would need to be substantiated by clear evidence.</p> <p>Recommend: No change to the policy.</p>
7	<p>Policy CS7 – Climate Change and Transport</p> <p>Surrey County Council (93) support the policy but suggest the final clause relating to the location, design and layout of development could be amended to place greater emphasis on adaptation to climate change.</p>	<p>The core strategy policy on climate change and transport seeks to cover the key issues contributing to or arising from climate change. It reflects the fact that the concerns about the growth and impact of car use in particular stems, to a considerable extent, from the contribution of traffic to growth in CO² emissions and therefore climate change. It is agreed that the policy could be usefully amended/supplemented to give clearer strategic</p>

Representation	Response
<p>Highways Agency (68) support the policy, in particular travel plans and recommends they contain appropriate monitoring, enforcement incentive and funding mechanisms to maximise success. It is however concerned that transport does not have a separate core policy. The Environment Agency (82) comment the climate change section of the plan should include a section on water resource strategy and the predicted impacts of climate change on flooding which include predicted increases in flows of up to 20% by 2050 and 30% by 2110.</p> <p>Green Street Action Group (124) are concerned that the adequacy of water supplies and risks of drought are not addressed in the plan.</p> <p>SEERA (94) asked for policy support and clear reference in the plan for the enhancement and/or management of the regional transport spokes that relate to the Borough.</p>	<p>guidance on the issues of flooding, adaptation to climate change, water supply/conservation and transport hubs. The Highway Agency point relating to travel plans can best be addressed in a reviewed Policy CC2.</p> <p>Recommend: The following changes to Policy CS7 (now SP7) and consequential changes to the supporting text and other parts of the plan as follows:</p> <ol style="list-style-type: none"> 1. Add a new sub-point to the policy on water resources; “Promote the efficient use and conservation of water resources” . 2. Add to the policy reference to dealing with both the reduction of flooding and avoidance of risk; ”Promote measures to reduce flooding and the risks from flooding”. 3. Add a new sub-point to reflect Staines’ role as a transport interchange; “Support measures to enhance and manage Staines’ role as a public transport interchange”. 4. Add to plan objective No. 21 dealing with environment; “... and further improves Staines’ role as a public transport interchange”. 5. Add the following sentence in the justification to plan objective No. 21; “It also recognises the role of Staines’ as a regionally important transport interchange point” 6. Add a new paragraph 11.8 to precede Policy CS7 to explain the reference to transport interchange; “The draft South East Plan policy T3 seeks to develop regional transport hubs, spokes and transport interchange points. Staines is identified as a transport interchange point within the region to recognise its bus and rail facilities and the services they support”. 7. Add new paragraph 11.9 to precede Policy CS7 to explain

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		<p>the references to water resources and flooding; “In the future wetter winters and drier summers are predicted with projections of increases in flood water of 20% up to 2050 and 30% by 2110. Flood risk presents a twin challenge of seeking ways to reduce the extent of flooding as well as to locate and design development to avoid risks to people and property. Drier summers require a range of measures to use available water wisely. This will include rain water collection, re-use of ‘grey water’, and efficient use of portable (drinking) water.</p> <p>8. Cross refer to Policy CC2 on Sustainable Travel.</p>
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Appendix B (ii)

DETAILED POLICIES

	Representation	Response
8	<p>Policy HO1 - Providing for New Housing Development</p> <p>Staines Town Society (87), Surrey County Council (93), Surrey Police (109), Rugby Estates (114) and Cemex (80) support the policy but Staines Town Society (87) want greater encouragement for the conversion of offices to residential – a point also made by the Green Street Action Group (124). Cemex (80) are concerned about a ‘blanket’ encouragement to use employment sites and want sub-point (e) deleted. Surrey Police (109) want it noted that development needs to take account of the ‘Secured by Design’ initiative. Cemex (80) want to see a surplus of housing sites as some sites identified may not come forward (the same point is made by Notcutts (74)), sub-point (a) should be amended to also refer to a ‘careful review’ of established Green Belt boundaries and the policy should explicitly refer to meeting the South East Plans housing requirements.</p> <p>The Environment Agency (82) wants the policy to refer to flood risk. Ashford Sports Club (119) and Crane Road Properties (120) support sub-point (e) which refers to encouraging redevelopment of poorly sited employment sites for housing. SEERA (94) want an addition to the policy to refer to better use being made of the existing stock. Ms Sheehan (96) suggests sub-point (c) of the policy, which encourages the change of use of buildings to housing, should be made ‘subject to’ other policies of the plan and not just ‘take account’ of them’.</p> <p>Lower Sunbury Residents Association (118) consider development in Sunbury should be limited due to lack of infrastructure and there should be a policy against redeveloping gardens for housing – with reference made to the loss of biodiversity.</p>	<p>It is agreed the conversion of offices to residential can add to supply and that is why sub-point (c) already gives explicit encouragement to provision via changes of use. Contrary to the views of Cemex a ‘blanket’ encouragement to use employment sites is not given as major well sited employment sites are identified in the plan for retention in employment use. References to ‘Secured by Design’ are best elaborated on in supplementary guidance however the importance of designing out crime is already covered in Policy EN3 (e) on the design of new development.</p> <p>The housing capacity assessments undertaken currently suggest a small surplus of supply over South East Plan figures which will compensate for any reductions in due course if sites do not come forward e.g due to flood constraints. No further surplus is considered necessary – the objectors are promoting sites in the Green Belt on this basis. The Council is not proposing to release Green Belt land and amending the policy to give commitment to review the Green Belt is inconsistent with this approach and National Policy.</p> <p>Cross reference to flood risk is considered unnecessary in this policy as it is dealt with in other policies.</p> <p>The SEERA (94) suggestion that there should also be support for better use of the housing stock is agreed and sub-point (b) already refers directly to bringing empty houses back into use.</p> <p>Recommend: That no change is made to the policy.</p>
9	<p>Policy HO2 – Contingency Strategy for Meeting Housing Provision</p> <p>Surrey County Council (93) and GOSE (95) support the policy. Europa Business Consultancy (108) object because they consider</p>	<p>The plan aims to meet the draft South East Plan housing requirements as this is the most recent expression of strategic housing needs and is likely to be the adopted plan by the time the Council’s plan is adopted. The Council is satisfied it has identified sufficient housing to meet the required need and the</p>

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	<p>housing provision should conform to the Structure Plan or adopted South East Plan and not the draft South East Plan and that specific contingency sites should be identified so they can be released quickly if needed. This should include Green Belt sites – a point also made by Surrey County Council Estates (78). Cemex (80) consider sub-point (l) of the policy, referring to the possible use of CPO powers, should be deleted and Green Street Action Group (124) want more detail of when the powers may be used. Ashford Sports Club (120) object that the release of Green Belt is not included as a contingency.</p>	<p>contingency policy is in effect a precautionary measure should circumstances change. If the policy itself proved inadequate to meet any shortfall it is considered the plan as a whole would need to be formally reviewed. Commitment to review the Green Belt outside a complete review of the plan and consideration of other policy options would in principle fail to properly test if circumstances were so exceptional as to warrant consideration of Green Belt changes.</p> <p>The views of Surrey County Council Estates (78) are not consistent with the County Council's (93) policy position. Deletion of the references in the policy to the possible use of CPO powers to assist in bringing sites forward would be inappropriate as it would preclude consideration of the powers authorities are given to undertake their proper planning function. The powers are nevertheless given for use as a last resort and because their use will be the exception rather than the norm it would be difficult to seek to define all the possible circumstances where they could theoretically be used. It is therefore considered inappropriate to attempt to define those circumstances in the plan.</p> <p>Recommend: No changes to the policy.</p>
10	<p>Policy H03 – Affordable Housing</p> <p>Staines Town Society (87) support the policy and consider it should also include reference to 'key workers'. Surrey County Council (93) supports the policy but consider it could be extended to require financial contributions from residential development below the threshold of 10 dwellings. GOSE (95) suggest the policy could make clear that sheltered or extra care housing is not exempt from the need to provide an element of affordable housing. Europa Business Consultancy (108) consider the policy will fail to meet all affordable housing needs as housing provision overall is reducing and they say that Green Belt sites should be released for affordable housing. Rugby Estates (114) consider that the apparent</p>	<p>Detail of groups who might benefit from provision, including 'key workers' and, how financial contributions are calculated are more appropriately covered in supplementary guidance the Council propose to prepare. Account of any particular site specific considerations is covered in the policy by reference to "sites suitable for affordable housing" and the use of the word "negotiate".</p> <p>Release of land from the Green Belt for affordable housing would be contrary to Green Belt policy at local, strategic and national level, and contrary to the intention to 'save' the existing Local Plan Policy.</p> <p>The suggestion by Surrey County Council that a financial contribution from residential developments of below the policy</p>

	Representation	Response
	<p>contradiction between a target of 40% affordable housing and negotiating for 50% on qualifying sites should be clarified. They also consider flexibility should be allowed in the policy to take into account site specific considerations. Tidegrove Ltd (90) also seeks greater flexibility in the policies application. Ms Sheehan (96) wants clarification on how financial contributions in lieu of providing dwellings will be calculated. RPS (106) on behalf of Fairview Homes object to specific affordable housing targets being set, instead they should be negotiated in the context of particular planning applications.</p>	<p>threshold of 10 units could give opportunity to further extend the scope to provide funding for affordable housing and thereby increase supply overall is agreed. The suggestion on behalf of Fairview Homes is contrary to government guidance in PPS3.</p> <p>Recommend: Amend policy HO3 by adding a requirement for a financial contribution towards affordable housing from schemes of four to nine dwellings.</p>
<p>11</p>	<p>Policy HO4 – Housing Size and Type</p> <p>Surrey County Council (93) support the policy. Staines Town Society (87) consider that sub-point (a) of the policy could be stronger in making clear that of the required 80% 1 and 2 bed units, two-thirds should be 2 bed to give greater flexibility in accommodation leading to more mixed communities. They consider sub-point (c) should specify a proportion of dwellings to meet ‘life time home’ standards. Notcutts (74) object to the policy as it will not provide enough small homes and London Irish (85) object to the amount of smaller dwellings as it will stifle the housing development industry’s ability to respond to demand. Green Street Action Group (124) objects that no specific sites have been identified for extra-care housing and question the requirement of 80% of new dwellings to be 1 and 2 bed.</p>	<p>The growth in the number of small households over the plan period has been carefully researched and the 80% figure, of which two-thirds are to be 2 bed, arises from this. The two-thirds proportion is explained in paragraph 8.14 which precedes the policy. It is a policy approach supported by a large proportion of people at the ‘Issues and Options’ stage. Any change to this part of the policy would be inappropriate. The policy intentionally does not specify whether the 2 bed units are to be flats or houses and therefore there is no policy limitation on providing small houses. Extra-care or sheltered housing could be accommodated on a number of the larger proposal sites and it would be difficult to justify any one site as against another. The Council is satisfied that the need for 200 extra-care units can be achieved by ‘encouragement’ which is the word used in the policy.</p> <p>‘Lifetime homes’ are those with particular standards of accessibility and adaptability to meet a wide range of physical needs of people throughout their lifetime. It is now a part of the governments ‘Code for Sustainable Homes’ published in December 2006. The Code is currently voluntary but the government has signalled it is currently considering making it mandatory at some time in the future. The Code encourages all homes to be designed to this standard by its scoring system. It</p>

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12	<p>Policy HO5 – Housing for Gypsies and Travellers</p> <p>Both GOSE (95) and Surrey County Council (93) support the policy. Staines Town Society (87) considers that gypsy and traveller sites should not be allowed in the Green Belt. GOSE (95) identified a minor typographical error in sub-point (e).</p>	<p>is therefore considered unnecessary to reiterate the issue in LDF policy and inappropriate to simply set a quota on these to attain the standard.</p> <p>Recommend: No change</p> <p>Government Green Belt policy allows for gypsy and traveller sites subject to very special circumstances being demonstrated. This is reflected in the policy and it would be for the Council to judge when and if such circumstances are sufficient.</p> <p>Recommend the policy (now HO6) be amended by:</p> <ul style="list-style-type: none"> a) In the title changing the word ‘Housing’ to ‘Sites’ to reflect that it is sites which the policy seeks to provide. b) Sub-point (c) delete the second ‘has no’. c) Sub-point (e) delete the words ‘is provided’.
13	<p>Policy H06 – Housing for Travelling Showpeople</p> <p>Surrey County Council (93) objects to the policy because of the requirement of sites not to be in the Green Belt – they propose instead using the same wording as for the gypsy and traveller policy. The Showmans Guild of Great Britain (129) support the policy.</p>	<p>Accommodation for travelling show people is slightly different to gypsy and travellers in that there is a substantial amount of equipment and large vehicles and a requirement for maintenance facilities. Such sites have a more urban/industrial nature and are hence more appropriate to the urban area. Existing sites in Spelthorne are in the urban area.</p> <p>Recommend: No change.</p>
14	<p>Policy HO7 – Density of Housing Development</p> <p>Staines Town Society (87) agrees that higher densities in urban and suburban areas are appropriate and desirable to reduce car dependence and meet housing targets. However, they are concerned that in some cases densities are too high and a limit of 80 dwellings per hectare should be set for Staines Town Centre to maintain its character and contain car growth. Rugby Estates (114) support the densities proposed and the flexibility inherent in the policy by use of the word ‘guideline’. Green Street Action Group (124) objects that the policy does not reflect average regional</p>	<p>Density is a very general indicator of the amount of development a site can take and variations in dwelling size can significantly alter the scale of building(s) in any given scheme. Draft PPS3 and the draft South East Plan seek to encourage higher densities. The South East Plan seeks an average of 40 dph across the region as a whole with 50+dph in some urban and sub-urban areas. The density requirements in the policy reflect the density advice in draft PPS3, and the South East Plan as well as the high proportion of small units intended to be built during the plan period. The intended concentration on smaller units should be noted. In response to the point by Ms Sheehan</p>

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	densities of 40 dwellings per hectare. Tidegrove Ltd (90) supports the policy. Ms Sheehan (96) wants clarification on how Shepperton Town Centre is defined.	(96) Shepperton town centre, and also Ashford Sunbury and Staines, is defined on maps in the draft plan document. Recommend: No change.
15	<p>Policy EM1 – Land for Employment Development</p> <p>Cemex (80) consider the policy should acknowledge the likely employment demands from continued expansion of Heathrow and give sufficient flexibility to accommodate them. They suggest an additional sub-point “(d) Proposals for Airport – related uses on land close to Heathrow Airport will be accommodated if a need can be demonstrated”.</p> <p>Rugby Estates (114) support the policy but suggest sub-point (c) should make clear it is ‘designated areas’ for employment use that are to be protected.</p> <p>Galliard Homes (115) object that the site of Ash House/Mimosa Court at Littleton Road Ashford are in a designated employment area and that Policy EM1 should be amended to allow alternative uses on employment sites where there is a lack of demand.</p>	<p>The Terminal 5 decision made no requirement for additional development off-airport and there are no agreed proposals for development beyond T5. It would therefore be inappropriate to amend the policy in the manner suggested.</p> <p>The flexibility sought by Galliard Homes would be inappropriate. The Council need to consider employment needs over the plan period as a whole and this has resulted in the designation of employment areas to be protected ensuring sufficient employment space is provided/maintained. Fluctuations in demand as a result of varying economic circumstances could otherwise result in short term decisions which run-counter to longer term needs.</p> <p>The suggestion by Rugby Estates (114) is a helpful qualification.</p> <p>Recommend: The word ‘employment’ be inserted between ‘designated’ and ‘areas’ in sub-point (c) plus consequential changes arising from comments under Policy SP3.</p>
16	<p>Policy EM2 – Employment Development on Other Land</p> <p>Ms Sheehan (96) considers B1 use is by definition acceptable in residential areas and should be stated in the policy.</p> <p>The Highways Agency (68) support the policy, particularly development at transport hubs where least impact on the trunk road network should arise.</p>	<p>Whilst it is agreed that B1 uses are defined as uses appropriate to a residential area the policy seeks to cover employment uses generally. Identifying particular uses classes that fall within the scope of the policy is unnecessary and would not add to the understanding of the policy.</p> <p>The views of The Highways Agency are noted.</p> <p>Recommend: Only consequential changes arising from amendments to Policy SP3.</p>
17	<p>Policy TC1 – Staines Town Centre</p> <p>Arlington Properties (83) (owners of Two Rivers) support Policy</p>	<p>Staines Town Centre is located at one corner of the Borough and has a shopping catchment area which covers much of Spelthorne as well as a large area to the south and west outside</p>

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	<p>TC1 but proposes sub-point (a), which identifies means of providing further retail development, be amended to refer to re-use, or extension, of existing land/buildings on the High Street and Two Rivers being encouraged. Staines Town Society (87) are concerned that the further shopping proposed in Staines is more than Spelthorne's residents need and instead a smaller scale of development should be planned for with more open space and landscaping.</p> <p>Surrey County Council (93) considers the policy should highlight the scope to promote a Combined Heat and Power-plant (CHP) in the town centre to meet the requirements of policy CC1.</p> <p>Tidegrove Ltd (90) supports the policy including support for additional office development. The Highways Agency (68) supports the policy but seek a greater degree of parking restraint with maximum parking standards.</p>	<p>of the Borough. The plan has reflected the town centre's wider role. Longer term retail needs cannot be wholly provided via an extension of the Elmsleigh Centre hence the general encouragement of additional retail development. Two Rivers has potential for further development through extension/rebuilding and specific reference to this area in sub-point (a iii) in response to the owners comments would be helpful. This would not preclude increasing floorspace in other parts of the town centre although that potential is very limited. The encouragement of CHP would be better dealt with in Policy CC1 dealing with renewable energy. The issue of parking standards is dealt with in the context of Policy CC4 which deals with parking provision.</p> <p>Recommend: The policy be amended to delete repetition of matters already dealt with in employment and design policies and specific proposals. (b i and ii, and points a,b,c in the last paragraph) and delete detailed references to proposals for the Elmsleigh Centre which are otherwise set out in the Allocations DPD. That reference be made in paragraph 8.11 to scope within the Two Rivers scheme to meet longer term needs.</p>
18	<p>Policy TC3 – Development in Ashford, Shepperton and Sunbury Cross Centres</p> <p>Surrey County Council (93) comment the policy could highlight the scope for Combine Heat and Power-plants to serve town centres. Highway Agency (68) supports the policy and the scope for focusing development on town centres to reduce reliance on private cars.</p>	<p>The Combined Heat and Power issue is best addressed in policy CC1 but the Council will also need to consider where there may be air quality problems in those centres and on balance what is the most sustainable approach.</p> <p>Recommend: No change.</p>
19	<p>Policy TC4 – Local Shopping Centres and Parades</p> <p>The Highways Agency (68) prefers development close to transport hubs but notes development in local centres may also reduce the need to travel to larger ones.</p>	<p>Comment noted.</p> <p>Recommend: No change.</p>

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20	<p>Policy C01 – Providing Community Facilities</p> <p>Staines Town Society (87) suggests the policy should be amended to specifically refer to resisting the loss of Post Offices and Sub-Post Offices. Surrey County Council (93) and The Highways Agency (68) support the policy. The Theatres Trust (116) wants more promotion of arts and other cultural activities and mention that theatres should at least be referred to in the text. Lower Sunbury Residents (118) want to see good provision of services for elderly people, young people and primary care facilities.</p>	<p>Community facilities encompasses a very wide range of things and paragraph 11.4 seeks to list them, Post Offices are included in the list. The policy itself intentionally focuses on the adequate provision of facilities through new provision, retention of existing and resisting the loss of those that are needed. It is generic in its nature and does not seek to identify every type of community provision within the policy.</p> <p>Paragraph 11.4 already refers to health and social care facilities but could usefully specifically mention youth facilities and cultural facilities so as not to imply they are not important. There are no theatres in the Borough or proposals for them and references to them is therefore not necessary.</p> <p>Recommend: No change to the policy but add reference to ‘youth facilities’ and ‘cultural facilities’ in paragraph 9.8.</p>
21	<p>Policy CO2 – Provision of Open Space in New Development</p> <p>Sport England (55) objects to the policy because it does not provide additional open space for all development, they consider even elderly persons accommodation should have open space. They also refer to commercial development needing amenity space, cycle storage, shower facilities and gyms in larger commercial buildings. Staines Town Society (87) thinks the definition of family houses should also include two bedroom flats. Highways Agency (68) comments that specific open space proposals adjoining trunk roads should take account of road safety.</p>	<p>As currently drafted the policy seeks on-site open space provision in developments of family housing of 30 dwellings or more and, for schemes of less than 30 dwellings in areas where there is a shortage of open space provision should be made either on-site or there should be a commuted payment to assist off-site provision. It is agreed that the scope of the policy could be broadened to ensure that, one way or another, wherever there is an existing shortage of open space or where a new development might lead to a shortage additional provision is provided. It is not considered justified to seek additions/contributions where provision is already adequate.</p> <p>Recommend:</p> <p>a) The policy (now CO3) be amended by deleting the second paragraph and inserting: “Where any new housing is proposed in areas of the Borough with inadequate public open space provision, or where provision would become inadequate because of the development, the Council will seek the provision of new open space on-site or</p>

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22	<p>Policy EN1 – Green Belt (saved policy)</p> <p>Sport England (55) support the policy which allows essential outdoor sport and recreation. Thames Water (66) object because the Ashford Common Treatment Works are included in the Green Belt and they do not consider the site performs a Green Belt function. They add that keeping it in the Green Belt makes it more difficult to get approval for essential upgrades to the facilities. As an alternative to deletion from the Green Belt they support adding the following to the policy: “The Green Belt designation is not intended to restrict potential plans of organisation such as Thames Water in carrying out their statutory functions”.</p> <p>Europa Business Consultancy (108) support the restrictions on development in the Green Belt but want the boundaries reassessed to meet housing and employment needs which they consider cannot be met within the urban area. They also consider the word ‘permanent’ should be deleted from the policy. Cemex (80) want a review of the Green Belt boundary so as to produce a surplus of housing sites. The Highways Agency (68) is concerned about development in rural or Green Belt areas which add to travel demands.</p>	<p>financial contribution toward the cost of new off-site provision. If this is not feasible a contribution will be required to improve existing sites to enhance their recreational value and capacity.”</p> <p>Policy EN1 is a ‘saved’ policy from the current Local Plan and involves the ‘saving’ of the Green Belt boundary on the Proposals Map. Authorities are allowed to ‘save’ policies subject to this being approved by the Secretary of State via approval of their Local Development Scheme.</p> <p>The Council’s decision to save the policy is based firstly on the national and strategic policy position that Green Belts should be permanent and only altered in exceptional circumstances. There are no exceptional circumstances because housing and employment needs can be met from within the urban area. Neither the adopted Structure Plan nor draft South East Plan see a strategic need to amend the Green Belt in Spelthorne. The arguments of Europa Business Consultancy and Cemex are not accepted.</p> <p>The objection from Thames Water that the Ashford Common site should be deleted from the Green Belt is not accepted. It is a predominantly open site fulfilling a Green Belt function. Circular 17/91 Water Industry Investment Planning Considerations gives clear guidance to authorities on the sympathetic approach which should be given to the improvement of fixed plant such as water treatment works and need to meet statutory requirements. Any additional form of special description is considered unnecessary.</p> <p>Recommend: No change</p>
23	<p>Policy EN3 – Design of New Development</p> <p>Sport England (55) considers that the design of new development should seek to improve access to facilities for sport and recreation. Staines Town Society (87) consider the policy should be more</p>	<p>Sport England’s comments about improving access to facilities relate both to this policy but also have a bearing on Policy EN4 – which is dealt with in the section below. Staines Town Society’s reference to sustainable travel ties in partly with Sport England’s point. Sub-point (c) of the policy could be amended to include reference to this issue.</p>

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	<p>specific in requiring good landscaping in new development, encourage sustainable means of travel through design, and resist the loss of green space in town centres . Surrey County Council (93) supports the policy but say it should refer to their document ‘Surrey Design’ in order to comply with Structure Plan Policy SE4. They also want the policy to refer to provision for composting. Surrey Police (109) say references to ‘Secured by Design’ should be set out in the policy. Lower Sunbury Residents Association (118) want to see good modern housing design especially in Lower Sunbury. Thames Water (66) suggests the plan fails to deal with water use, supply and quality. Mrs Cook (18) objects to plastic replacement windows because secondary glazing of existing windows is as effective.</p>	<p>The Surrey Structure Plan Policy SE4 does not require references to ‘Surrey Design’ in LDF policies but does require them to reflect the principles in the Structure Plan Policy. The Borough Council intends to produce its own supplementary guidance on design.</p> <p>It is agreed that composting is an important part of recycling. The policy seeks to identify the need to provide space for materials that need collecting, which can include green waste, and raises particular design issues of access and storage. Composting does not raise access/collection issues as it involves material remaining on site and does not require the particular design considerations collection involves. Reference to ‘Secured by Design’ is already made in paragraph 12.16 which precedes the policy. Sub-point (f) already deals with the conservation of water resources and along with Policy CS5 provides the basis to deal with Thames Water points. Other than in the case of listed buildings there is no planning control generally on replacement windows.</p> <p>Recommend: The words “and encourage sustainable means of travel” be added to the end of sub-point (c).</p>
24	<p>Policy EN4 – Protection of Open Space</p> <p>Sport England (55) wants to see improved access to sport and recreation, see improved participation and reference to their document ‘Active Design’.</p> <p>Their objective is to secure and increase participation in sport and physical activity from the current 30% to 50% by 2020. This ties in with government initiatives to improve the health of the nation. They also want stronger wording in the policy to require any replacement of open space to be of equivalent or better quantity, quality and accessibility.</p>	<p>The current policy is focussed on the protection of open space but it is agreed it could be helpfully broadened to cover the provision of additional space, the improvement in quality of provision and facilitating access to open space and the attractiveness of provision through appropriate design. It could also usefully include support for pedestrian and cycle routes with a recreational role as well as networks of green space – as for example being advanced under the Green Arc initiative. The supporting text could refer to the objective of Sport England to increase participation in physical activity and the health benefits. The recommendation by English Nature of 1 ha per 1000 of accessible green space is noted but Spelthorne actually has 2.17 ha per 1000.</p>

Representation**Response**

<p>Thames Water (66) wants the policy amended so that an urban open space designation does not restrict their plans on carrying out their statutory functions.</p> <p>Surrey County Council (93) comments they are unclear whether the policy relates to urban open space or other open spaces as well. Lower Sunbury Residents Association (118) highlight the importance of the policy in protecting open space and enhancing and expanding sporting recreational opportunities where possible. Countryside Agency (84) want networks of green spaces and recreation routes, including those used for pedestrians and cyclists, protected and expanded and generally secure an increase in access and recreation in the countryside.</p> <p>English Nature (73) recommends their standard, of 1 ha per 1000 population of accessible natural green space, be adopted by the Council.</p> <p>SEERA (94) say the policy should be strengthened by reference to green infrastructure. Trustees of the Sisters of St. Paul (97) want the specific urban open space at the Ridings (formally used as a tennis court) deleted from protection. Cllr. Ian Beardsmore (59) wants the northern part of the Beechwood Avenue / Kennington Drive Estate, Sunbury to be added as protected urban space.</p>	<p>The current policy seeks to protect open space generally as well as specific sites within the urban area designated on the proposals map as ‘urban open space’. The proposal to delete the open space at the Ridings is rejected because of its contribution to the surrounding area. The proposal to add additional land at Sunbury is not accepted as it is a developed area with little open space and lacking the degree of openness required to be designated, but the policy provides a clear basis to resist proposals to develop open space in that part of the estate.</p> <p>Recommend:</p> <ol style="list-style-type: none"> 1. The title of the policy be amended to ‘Provision of Open Space, Sport and Recreation Facilities’. 2. The first two lines of the policy be deleted and the following inserted: “The Council will seek to ensure the Borough’s residents have sufficient open space which is well sited and suitable to meet a wide range of outdoor sport, recreation and open space needs by: <ol style="list-style-type: none"> a) Providing additional space where required b) Maintaining and improving provision and access to it either directly in relation to its own land or by encouraging owners / users of private sites and through the design and layout of developments. c) Seeking to maintain, improve and where appropriate expand networks of green space and pedestrian and cycle routes with a recreational role. d) Retaining existing open space used, or capable of use, for sport and recreation or having amenity value where: (then continue with current points renumbered accordingly) 3. Amending the sub-point (f) by adding the words ‘or better’ after the word ‘site’ in the second line. 4. Amending sub-point (h) in the existing policy by adding the words ‘or greater’ after the word ‘equivalent’ in
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	Representation	Response
		<p>the first line.</p> <ol style="list-style-type: none"> 5. Amend the supporting lower case text by adding a new paragraph before 10.21. “Open space and sport and recreational facilities have an important part to play in the well being and quality of life of people. Sport England has a target to increase participation in sport and physical activity generally from the current 30% to 50% by 2020. This has an important role to play in generally improving the health of the nation to which the government attaches importance. In this context the protection and improvement of existing space and expansion of facilities necessary to meet needs is important. 6. Refer to allotments in paragraph 10.22 as part of sport and recreation facilities. 7. Refer to the study of allotments in paragraph 2.23. 8. Add to paragraph 10.21 ‘references to increasing levels of participation in sport and physical activity’. 9. Add a new paragraph 10.22: “The study also recognised the existence and importance of pedestrian and cycle routes as both important means of access to places but also providing for recreation. These will be protected, improved and extended where appropriate. Open space sites not only have a value individually but also collectively as broader networks and the Council supports the ‘Green Arc’ initiative which covers outer London Boroughs and North Surrey”.
25	<p>Policy EN5 – Buildings of Architectural and Historic Interest</p> <p>Staines Town Society (87) want the references in paragraph 12.26 that the Council will if necessary use its statutory powers also reflected in the policy.</p>	<p>Reference to the use of statutory powers is already made in sub-point (d) but for clarity the wording can be made more explicit.</p> <p>Recommend: The following words are added to the end of sub-point (e) “.... to ensure listed buildings are kept in proper repair”.</p>
26	<p>Policy EN6 – Conservation Areas, Historic Landscapes, Parks and Gardens</p>	<p>The LDF process involves extensive consultation including on conservation policy and on which there is open invitation for anyone to contribute. Consultation includes over 650 individuals</p>

Representation**Response**

	<p>Staines Town Society (87) objects that the policy does not expressly refer to the involvement of local groups and statutory bodies in the planning policy for Conservation Areas. Surrey County Council queries whether the policy as a whole is compatible with Policy HO7 on density of housing development. They also suggest historic parks, gardens and historic landscapes should be given the same weight in policy as conservation areas. Lower Sunbury Residents Association (118) want to ensure good modern housing design in the Lower Sunbury Conservation Area.</p>	<p>and groups on the LDF contact list, including Staines Town Society. Conservation Area enhancement plans, to which sub-point (a) of the policy refers, are also required to follow statutory requirements of involvement over and above the statutory requirements for LDFs. This includes a public meeting to which all those affected can attend. It is unnecessary to set these additional statutory requirements in policy as the Council will need to follow them anyway.</p> <p>Policy HO7 on density needs to be applied in the context of other policies including Policy EN6 as conservation and potential conflicts between conservation and density needs to be resolved in the context of individual proposals. Conservation Areas have a particular importance in both national policy and planning law including through their process of designation. It would therefore be inappropriate to accord historic parks, gardens and historic landscapes the same importance when they are not given the same weight in national guidance and planning law.</p> <p>Recommend: No change</p>
27	<p>Policy EN9 – Tree Protection</p> <p>Green Street Action Group (124) considers there needs to be a much stronger policy to protect trees and shrubs in the urban environment.</p>	<p>The primary tool available to protect trees is through Tree Preservation Orders. In the case of new development some control can be exercised through the use of planning conditions although where trees are of particular merit a TPO should also be applied. There are no statutory mechanisms to preserve shrubs although landscaping schemes with new development can include them and such schemes can be subject to planning conditions and enforcement. Sub-point (d) of Policy EN3 – Design of New Development already covers the issue of landscaping in new developments and Policy EN9 gives a clear commitment to the use of Tree Preservation Orders wherever appropriate.</p> <p>Recommend: No change</p>
28	<p>Policy EN10 – Protecting and Improving the Landscape and</p>	<p>It is agreed that, whilst it is unnecessary for the plan to repeat</p>

Representation	Response
<p>Biodiversity</p> <p>Surrey County Council (93) welcome the reference to ‘Green Arc’ in paragraph 12.39 and comment that as it is not proposed to include a policy on national nature conservation assets in the Borough a sub-point should be added to Policy EN10</p> <p>“e) safeguarding national and international sites designated by reason of their value for nature conservation.</p> <p>Surrey Wildlife Trust (105) consider the supporting text of this policy and EN11 should refer to the Surrey Biodiversity Action Plan, the Countryside and Rights of Way Act 2000 and PPS9 as the basis for the protection of nature conservation.</p> <p>Europa Business Consultancy (108) considers the policy fails to adequately identify ways to improve areas of degraded landscape. They consider these should be identified on the proposals map. They propose deleting the qualifying phrase ‘whenever possible’ in sub-point (b) which deals with the role of new development.</p> <p>English Nature (73) considers there should be mention of Local Nature reserves in the biodiversity section. They also comment the plan should explain how housing will be allocated and wildlife and protected species safeguarded. They consider all development in Spelthorne should incorporate measures to protect and enhance biodiversity. Lower Sunbury Residents Association (118) consider there needs to be a proper management strategy to optimise quality habitats such as Sunbury Park, the Walled Garden and Orchard Meadow. Green Street Action Group (124) considers consideration of nature conservation should include urban gardens and it would be helpful to provide a list in the plan of flora and fauna to be</p>	<p>national guidance, it would be helpful for the sake of completeness to add an additional sub-point to the policy to express the Council’s commitment to safeguard national and international sites.</p> <p>It is not considered appropriate to express commitment in the policy to the Surrey Biodiversity Action Plan as that document is not fully complete and the form of references sought would relegate the LDF policy to documents which are not part of the Council’s LDF. It will nevertheless be an important background document in informing the application of Policy EN10.</p> <p>English Nature seeks clarification on the application of nature conservation issues to development proposals. Sub-point (b) already sets out appropriate commitment to taking the issue into account. Whilst Nature Reserves may have a role to play in managing nature conservation assets, the principle of joint working on appropriate projects is covered in sub-point (a) and reference to specific projects is considered unnecessary. It is considered sub-point (b) adequately addresses how nature conservation will be dealt with in considering development proposals including proposals involving urban gardens. It is not considered appropriate to list in the plan what would be an enormous list of flora and fauna of importance in the Borough. Significant details are set out elsewhere in relation to international, national and local sites of importance. The suggestion by Europa Business Consulting to identify all degraded landscape sites was done in the current Local Plan but conditions can change during the life of the plan leading to such designations becoming quickly out-of-date, particularly in relation to mineral working sites. The suggested change of wording would weaken the policy and might imply the Council favours development in the Green Belt. In response to the suggestions by English Nature for a Landscape Character Assessment, which is referred to in government guidance PPS7</p>

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	<p>preserved.</p> <p>English Nature (84) recommends the Council carry out a Landscape Character Assessment on which to base a landscape policy. They also recommend the use of Supplementary Planning Documents to provide a character analysis of the Borough.</p>	<p>– ‘Sustainable Development in Rural Areas’, the Council has undertaken a general assessment in preparing the currently adopted Local Plan and designated both areas of landscape character and also degraded landscape. The Council has never considered that areas of character in Spelthorne would equate to those designated in other parts of Surrey as Areas of Great Landscape Value (AGLV) and which are regarded as just one step down from nationally designated Areas of Outstanding Natural Beauty (AONB). The national guidance now recommends against such local designations and instead recommends drafting policies to protect specific areas. Policy EN10 provides the policy basis for protecting and improving the landscape. It relies on a number of actions including the consideration of landscape issues and accounting for landscape in development proposals. In the context of the nature and quality of the landscape and the discretion given in PPS9 it is not considered necessary to undertake a formal Landscape Character Assessment of the Borough to support the Policy EN10.</p> <p>Recommend: An additional sub-point be included at the beginning of the list in the policy, now EN8, and renumber the remainder accordingly “a) safeguarding sites of international and national importance”.</p>
29	<p>Policy EN12 – Development Affecting Sites of Nature Conservation Value (saved policy)</p> <p>RSPB (125) uses an objection to this saved policy to suggest that the key diagram on page 123 of the document should identify all international, national and locally important nature conservation sites in the Borough and identify any areas or sites for the restoration or creation of new habitats which contribute to regional targets and say this should be supported through appropriate policies. They refer to work they are currently undertaking to</p>	<p>Policy EN12 is aimed at ensuring development proposals do not harm sites of nature conservation value and supports Policy CS6 which includes commitment to protect and seek opportunities to enhance such areas. Policy E10 gives commitment to implement projects to create or improve habitats of nature conservation value. It is considered the policy objectives RSPB are looking for are already appropriately set out in the plan. The key diagram is not the place to identify international, national and local sites because it is too small (A4 in size) to effectively convey this information. Paragraphs 12.46 and 12.48 make clear these are to be shown on the Proposals</p>

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	<p>identify areas of mineral restoration with potential for priority habitats.</p>	<p>Map. Recommend: No change</p>
<p>30</p>	<p>Policy EN13 – The Setting of the River Thames and its Tributaries</p> <p>Staines Town Society (87) suggests sub-point e) is amended to also refer to the improvement of public access ‘alongside’ rivers rather than just to them. Surrey County Council (93) comments that the policy makes no reference to safeguarding facilities which support the use of the River Thames.</p> <p>The Environment Agency (82) comment that the policy and supporting text should specify the buffer zones to watercourses that need to be kept clear of development to allow maintenance and space for habitats.</p>	<p>It is agreed the plan could helpfully be amended to also include a presumption to safeguard facilities which support the use of the River Thames. This is best done through an additional policy and text and broadening the sub-heading to this part of the Environment chapter. The inclusion of the word ‘alongside’ would remove any lack of clarity about the nature of the improved access sought in sub-point (e). The detail requested by the Environment Agency on maintenance areas would be more appropriate in supplementary guidance.</p> <p>Recommend the following alterations:</p> <ol style="list-style-type: none"> 1. delete the words “The setting of the” from the title of this section of the chapter so it reads “River Thames and its tributaries”. 2. add the word “and alongside” after “access to” in sub-point (e). 3. add a new policy, EN10, and text as follows:- The River Thames has an important recreational role and is also a tourist facility. It is important that facilities that support its use for boating are protected. These include commercial sites providing facilities, including mooring, visitor facilities and access facilities for launching boats. <p>EN15 Facilities which support the recreational use of the River Thames will be safeguarded and promoted by:</p> <ol style="list-style-type: none"> a) refusing development which involves the loss of facilities unless it can be demonstrated they are no longer required. b) support the maintenance and provision of visitor facilities, including those for access

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<p>31</p> <p>Policy EN14 – Control of Advertisements</p> <p>Green Street Action Group (124) object that the Council intend to revoke the Area of Special Advert Control. They ask that the original Local Plan Policy BE18 be saved.</p>	<p>Areas of Special Advertisement Control (ASAC) are designated and reviewed under separate powers. Proposals to revoke the ASAC in Spelthorne were agreed by the Secretary of State in October 2006. There is no case to save Policy BE18 as drafted because it refers to ASACs.</p> <p>Recommend: No Change</p>
<p>32</p> <p>Policy EN15 – Flooding</p> <p>The Environment Agency (82) supports the policy and its cross reference to PPS25. They welcome the Council's intention to produce supplementary guidance on the subject. They also want reference in the plan to 8 metres maintenance areas adjoining main rivers. Thames Water (66) objects that the policy does not also refer to flood risk from sewers and other forms of flooding. Staines Town Society (87) wants the policy extended to raise awareness of retaining water absorbing areas and not paving over front gardens.</p> <p>Surrey County Council (93) suggests the final sub-point (b) be amended to add reference to the assessment and introduction of appropriate measures to minimise and mitigate any threat.</p> <p>Europa Business Consultancy (108) says the policy fails to avoid development in flood plains and implies an acceptance of development contrary to national guidance, the South East Plan and the Surrey Structure Plan. Lower Sunbury Residents Association (118) want development in flood plains minimised, including gravel workings, and for the Environment Agency to clarify the true extent of the flood plain.</p> <p>Green Street Action Group (124) object as the policy does not reflect BE29 in the Local Plan or safeguard the quality of ground-water and surface water as currently required in Policy BE30.</p>	<p>Since completion of the consultation the Council has undertaken a Strategic Flood Risk Assessment in line with the requirements in the new PPS25 published in December 2006. The SFRA examines all forms of flooding which, not only needs to ensure new development meets the sequential approach set out in the guidance – which should seek firstly to avoid areas of flood risk – but also address the risks faced by residents and businesses already at flood risk. A revised policy (and justification) is proposed which provides a more comprehensive approach to flooding and also reflects the specific requirements in government guidance. The SFRA (comprising two documents) sets out the background to the Council's approach. Some of the more detailed issues and 'awareness' raising points are better addressed in the proposed Supplementary Planning Documents on Development Control Policies.</p> <p>Recommend: The following supporting text and policy (now LO2) replace paragraphs 12.59 to 12.62 and the current policy EN15:</p> <p>A significant area of Spelthorne lies in the floodplains of the Rivers Thames, Colne (and related river system) and Ash. The only flood defences are very limited and on parts of the River Colne river system and Ash.</p> <p>The Environment Agency Thames Catchment Flood Management Plan (CFMP) (September 2006) confirms the above and sets out some 'main messages':-</p> <p>a) Flood defences cannot be built to protect everything.</p>

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	<ul style="list-style-type: none"> b) Localised defences might be developed. c) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. d) Land for future flood risk management will be identified and protected by authorities. <p>The Council has undertaken a Strategic Flood Risk Assessment in accordance with PPS25. It shows that 23.2% of the Borough (and 14.1% of its urban area) is at risk in a 1 in 100 yr flood event (Zone 3) and some 48% of the Borough in a 1 in 1000 flood risk area (Zone 2). The SFRA recommends the 1 in 1000 flood risk area is broadly equivalent to the 1 in 100 + 20% for climate change and the maximum of the two outlines is taken to define flood zone 2. the same in Spelthorne. The 1:100 year flood risk area affects over 5,600 residential properties and large commercial areas including about half of Staines town centre. Staines in particular provides a wide range of facilities and services and is accessible by public transport for a large number of the Borough's residents and people outside the Borough.</p> <p>Removing the existing flood risk by relocating development is not a realistic option because of the enormous costs and lack of alternative land outside the flood risk area. A 'sequential' approach of ensuring new development is only in areas not at flood risk would on its own fail to deal with the risks faced by those already in flood risk areas. The sequential approach to new development would also not realise the opportunity identified in the CFMP and draft PPS25 to use development as a way to manage and reduce flood risk. It would also not ensure that the continued role of Staines in particular, as a sustainable and accessible location for many facilities including as a major shopping centre, could be fully maintained.</p> <p>For the above reasons a comprehensive, realistic and effective</p>

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		<p>approach to dealing with flooding and its risks is required. This must avoid adding to the risks to people and property and seek to reduce the extent of flooding that would otherwise arise from doing nothing. The following policy follows PPS25 and, in line with the guidance, includes exceptions to the normal sequential approach to locating all new development outside flood risk areas. An exception is taken in the case of redevelopment of already developed sites in existing urban areas where this will reduce flooding, does not add to risks to people and property and enables the continued role of Staines town centre as an otherwise sustainable and accessible location for a wide range of services and facilities. The approach does not allow residential development within the 1 in 100 flood area that would put people at risk because there is enough land for housing outside this area.</p> <p>The following policy gives positive support to flood risk management measures. The Environment Agency is currently assessing what measures might be appropriate in its 'Lower Thames Strategy', however, they are unlikely to be implemented at least until toward the end of the plan period and therefore any potential benefits will not be taken account of in decisions on development proposals before full implementation of such schemes that may proceed.</p> <p>The policy also seeks to ensure the capacity of the flood plain is both preserved, and, where possible, through appropriate development, increased and impedance to the flow of floodwater is, if possible, reduced. Development of existing developed sites in flood risk areas for less vulnerable uses will be supported where they achieve reductions in flood risk through increased flood storage capacity and reduced impedance to flood water flow. Account is taken in the policy of the impact of climate change by highly vulnerable uses not being permitted in the 1 in 1000 (1:100+20%) (Zone 2) flood area and development in this area otherwise being required to be flood resistant/resilient.</p>
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		<p>More stringent controls on development are made on open land in areas at higher flood risk – 1:20 (referred to in PPS25 as ‘functional flood plain’) These are areas of generally fast flowing floodwater where there are particular risks to people and property.</p> <p>All applications covered by the provisions of the policy will require an appropriate Flood Risk Assessment including sites over 0.5ha, or 10 dwellings or more or over 1000m² of non-residential development outside the 1;1000 flood risk area in Zone 1.</p> <p>The extent of the 1 in 20 (Zone 3b), 1 in 100 (Zone 3a) and 1 in 1000/ (100+20% for climate change) (Zone 2) are shown on the submission Proposals Map.</p> <p>PPS 25 categorises different degrees of flood risk by zones and identifies uses appropriate to each zone by level of vulnerability. The following table summarises these details and indicates what will be permitted or precluded from flood risk areas in Spelthorne in line with the following policy</p> <table border="1" data-bbox="1285 1002 2040 1415"> <thead> <tr> <th>Flood Zone</th> <th>Degree of Flood Risk</th> <th>Appropriate Uses</th> </tr> </thead> <tbody> <tr> <td>Zone 1</td> <td>Low probability with less than a 1:1000 chance of flooding</td> <td>No uses precluded on flooding grounds</td> </tr> <tr> <td>Zone 2</td> <td>Medium probability. 1:100 to 1:1000 chance of flooding</td> <td>‘More vulnerable’ uses such as housing, ‘less vulnerable’ uses such as commercial uses and ‘water compatible’ uses</td> </tr> </tbody> </table>	Flood Zone	Degree of Flood Risk	Appropriate Uses	Zone 1	Low probability with less than a 1:1000 chance of flooding	No uses precluded on flooding grounds	Zone 2	Medium probability. 1:100 to 1:1000 chance of flooding	‘More vulnerable’ uses such as housing, ‘less vulnerable’ uses such as commercial uses and ‘water compatible’ uses
Flood Zone	Degree of Flood Risk	Appropriate Uses									
Zone 1	Low probability with less than a 1:1000 chance of flooding	No uses precluded on flooding grounds									
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			<table border="1"> <tr> <td></td> <td></td> <td>such as open space.</td> </tr> <tr> <td>Zone 3a</td> <td>High probability. Greater than 1:100 chance of flooding</td> <td>'Less vulnerable uses' and 'water compatible uses'</td> </tr> <tr> <td>Zone 3b</td> <td>Greater than 1:20 chance of flooding. Area of fast moving water and referred to as Functional flood plain</td> <td>Only water compatible uses</td> </tr> </table>			such as open space.	Zone 3a	High probability. Greater than 1:100 chance of flooding	'Less vulnerable uses' and 'water compatible uses'	Zone 3b	Greater than 1:20 chance of flooding. Area of fast moving water and referred to as Functional flood plain	Only water compatible uses
		such as open space.										
Zone 3a	High probability. Greater than 1:100 chance of flooding	'Less vulnerable uses' and 'water compatible uses'										
Zone 3b	Greater than 1:20 chance of flooding. Area of fast moving water and referred to as Functional flood plain	Only water compatible uses										
			<p>Policy</p> <p>The Council will seek to reduce flood risk and its adverse effects on people and property in Spelthorne by:</p> <ol style="list-style-type: none"> 1. supporting appropriate comprehensive flood risk management measures within or affecting the Borough which are agreed by the Environment Agency, 2. reducing the risk of flooding from surface water and its contribution to fluvial flooding by requiring all developments of one or more dwellings and all other development over 100m² of floor space in the Borough to have appropriate sustainable urban drainage schemes, 3. maintaining flood storage capacity within the Zone 3a by refusing any form of development on undeveloped sites which reduces flood storage capacity or impedes the flow of flood water 4. maintaining the effectiveness of the more frequently flooded area of the flood plain (Zone 3b) to both store water and allow the movement of fast flowing water by not permitting new development or extensions, 5. not permitting redevelopment for residential use or 									

	Representation	Response
		<p>other ‘more vulnerable’ uses within the Zone 3a or ‘highly vulnerable uses’ within the Zone 2 area where flood risks cannot be overcome.</p> <p>6. supporting the redevelopment of existing developed sites in the urban area at flood risk in Zone 3a and 3b for ‘less vulnerable’ uses where:</p> <ul style="list-style-type: none"> a. a minimum increase of flood storage capacity of 20% can be secured (all flood storage areas to be effective at all times throughout the life time of the structure/use and do not create unacceptable risks to people in times of flood) b. it reduces impedance to the flow of flood water where there would be flowing flood water c. appropriate access for the maintenance of water courses is maintained d. there is no adverse impact on the integrity and effectiveness of flood defence structures <p>7. any development in areas of flood risk Zones 2, 3a and 3b must be designed to be flood resilient/resistant.</p> <p>8. all development proposals within Zones 2, 3a and 3b, and development outside this area (Zone 1) on sites of 0.5ha or of 10 dwellings or 1000m² of non-residential development or more, will require an appropriate Flood Risk Assessment</p>
33	<p>Policy EN16 – Air Quality</p> <p>Notcutts (74) support the policy as residential development should not be focussed in areas of poor air quality. Staines Town Society (87) refer to the problems of traffic congestion and associated pollution in Staines Town Centre arising, to a large extent, from through traffic. They propose an addition to</p>	<p>The primary cause of poor air quality in Spelthorne is traffic and arises from both generally high volumes of vehicle movements and in particular congestion. However, seeking to reduce congestion in particular locations presents both technical traffic management challenges as well as the risk of simply transferring the problem elsewhere. A range of initiatives are already identified in the Local Transport Plan and Spelthorne Community Plan. The Preferred Options policy focused on how</p>

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<p>the policy. “The Council will work with the local County Councillors and the Local Transportation Service to find ways of diverting through traffic from Staines Town Centre”. The Highways Agency (68) repeat the point made in relation to Policy CS1 about the EU Air Quality Directive and the limit value for NO² by 2010 and state that they may need to object to proposals which might cause a compliance problem with the directive. Lower Sunbury Residents Association (118) want a clear strategy to reduce air pollution to meet government targets. Green Street Action Group (124) refer to a need to have regard to the cumulative impact of small developments on air quality and suggest the need to designate areas where development will be restricted.</p>	<p>proposals for new development should be considered but it is agreed a broader ‘spatial planning’ approach is needed which reflects actions already identified in other documents and the need to address the air quality impact on existing development. It is proposed to replace the existing policy and supporting text.</p> <p>Recommend: Policy EN16 (now EN3) and paragraphs 2.7, 10.14-10.18 amended or added to as follows:</p> <p>Relevant Objective:</p> <p style="padding-left: 40px;">3) To secure an improvement in the Borough’s air quality</p> <p>Paragraph 2.7 add references to problems at Sunbury Cross.</p> <p>12.64 The biggest single contributor to poor air quality in Spelthorne is road traffic the main road corridors are the worst affected areas. Whilst advances in vehicle technology offer scope for improvements there are some areas of poor air quality in the Borough where the prescribed EU standard for nitrogen dioxide is exceeded and may continue so beyond 2010 (a date by which EU standard are required to be met), notably alongside parts of the A308 and around Sunbury Cross. The level of particulates (known as PM10s) is also a concern adjoining the M25 and Heathrow Airport in the north of the Borough.</p> <p>12.65 Air quality is an important environmental issue for Spelthorne. The Borough has been declared an Air Quality Management Area, reflecting the need to improve air quality, and an Air Quality Action Plan has been produced.</p> <p>12.66 Much of the traffic on major roads in the Borough is through traffic, over which the Council has little or no direct influence. However, there is more scope to influence trips that have origins or destinations within Spelthorne. Measures in the plan to locate new development where it is accessible by non-</p>
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	<p>car based modes of travel and support for initiatives such as travel plans to encourage alternatives to car use offer some scope to reduce the reliance on the car for local journeys and thereby help improve air quality.</p> <p>12.66b There is also scope to reduce reliance on cars through the general promotion of non-car based transport through improved facilities, services and information on public transport and for cyclists. Improving non-car based transport is one of the six themes in the Spelthorne Community Plan and there are specific actions and targets identified in the County Council's Local Transport Plan. Car use can also be limited to an extent by reducing parking provision. The appropriate routing of lorries and low emission technology for both public service and other vehicles can also make a contribution.</p> <p>12.66c A specific proposal the Council is promoting through the LDF is, as part of the extension of the Elmsleigh Centre, the reformatting of the Staines bus station to make it more attractive and safe for passengers and thereby encourage the greater use of bus travel.</p> <p>12.67 New developments may affect air quality. Where development is proposed in areas of poor air quality measures will be required to ensure an acceptable environment will exist for occupiers of the development. The Council will require air quality assessments to be undertaken for development proposals where the development:</p> <p>12.67a The nature of the assessment will depend on local air quality circumstances. Developers are recommended to make early contact with the Council on what may be required. Where adverse impacts can be overcome by mitigation measures these will be required by condition or agreement. Where adverse</p>

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		<p>impacts cannot be overcome permission will be refused.</p> <p>12.68 The purpose of the following policy is to set out how the aim of the Core Strategy policy CS6, of contributing to improving air quality in the Borough, will be achieved</p> <p>Policy EN16 Air Quality</p> <p>The Council will seek to improve the air quality of the Borough and minimise harm from poor air quality by:</p> <ol style="list-style-type: none"> 1. supporting measures to encourage non-car based means of travel 2. supporting appropriate measure to reduce traffic congestion where it is a contributor to existing areas of poor air quality 3. require an air quality assessment where development: <ol style="list-style-type: none"> a) is in an air quality management area, and b) generates significant levels of pollution c) increases traffic volumes or congestion d) is for non-residential use of 1000m² or greater e) is for 10 or more dwellings f) involves development sensitive to poor sensitive air quality 4. refusing development where the adverse effects on air quality are of a significant scale either individually or in combination with other proposals and which are not outweighed by other important considerations or effects and can be appropriately and effectively mitigated.
34	<p>Policy EN17 – Development and Noise</p> <p>Notcutts (74) consider that housing development should be in less noisy locations.</p>	<p>The Council's approach is to avoid putting housing development very close to the airport and to require sound attenuation measures for areas further away but which are still noisy. The policy could be amended to be clearer on where development will be refused or where attenuation measures are otherwise required.</p>

	Representation	Response
		<p>Recommend: The policy (now EN12) be amended to read as follows:</p> <p>Policy EN17: Development and Noise The Council will seek to minimise the adverse impact of noise by:</p> <ol style="list-style-type: none"> 1. Requiring developments that generate unacceptable noise levels to include measures to reduce noise to an acceptable level. 2. Requiring appropriate noise attenuation measures where this can overcome unacceptable impacts on residential and other noise sensitive development proposed in areas with his noise levels. Development will otherwise be refused. 3. In the case of development close to Heathrow: <ol style="list-style-type: none"> a) refusing new residential development where aircraft noise levels are at or exceed 66 Leq; except in the case of the one-for-one replacement of dwellings. b) requiring appropriate attenuation measures for development between 60 and 65 Leq.
35	<p>Policy EN18 – Noise from Heathrow Airport</p> <p>BAA (80) object to the policy and want references to maintaining runway alternation and existing controls on ground noise as they may preclude improvements through other means such as alternative runway operating procedures or other airport ground operations. Staines Town Society (87) supports the policy and comment aircraft do not always adhere to designated noise preferential routes.</p>	<p>The various measures identified in the policy to contain the amount of noise from the airport such as air traffic movement limits (imposed by T5 inspector), runway alternation, noise preferential routes, night flight controls and various ground controls have arisen from detailed study and subsequent agreement including through planning inquiries for additional development. They play a very important role in limiting the impact of aircraft noise and the Council’s policy reiterates the particular weight it attaches to them and commitment to see them retained. BAA have not presented evidence to demonstrate their suggestions would be as effective in protecting the amenity of Spelthorne residents.</p> <p>Recommend: No change.</p>

Representation

Response

36	<p>Policy EN19 – Light Pollution</p> <p>Staines Town Society (87) objects to the policy because Surrey County Council is installing street lighting which is only partly directional and allows some light to escape upward. Surrey Police (109) support the policy as they consider light pollution to be an increasingly important consideration.</p>	<p>As currently drafted the policy only applies to lighting which requires planning permission. The policy could, however, be broadened to include a commitment to generally encourage appropriate lighting including that installed by Surrey County Council.</p> <p>Recommend: Policy EN19 (now EN14) be amended to read as follows:</p> <p>Policy EN19: Light Pollution The Council will seek to reduce light pollution by:</p> <ol style="list-style-type: none"> 1. encouraging the installation of appropriate lighting including by other statutory bodies. 2. only permitting lighting proposals which would not adversely affect amenity or public safety and require the lights: <ol style="list-style-type: none"> a) to be appropriately shielded, directed to the ground and sited to minimise any impact on adjoining areas b) and be of a height and illumination level of the minimum required to serve their purpose.
37	<p>Policy EN21 – Development on Land Affected by Contamination</p> <p>The Environment Agency (82) comment that development of any brown field site should be carried out in line with CLR 11 'Model Procedures for the Management of Land Contamination' and PPS23.</p>	<p>The model procedures relate to requirements for site investigations/remediation which, whilst relevant to development sites with contamination, is a level of detail which reflects accepted industry good practice and does not need to be set out in the LDF.</p> <p>Recommend: No change.</p>
38	<p>Policy CC1 – Renewable Energy, Energy Conservation and Sustainable Construction</p> <p>British Wind Energy Association (81) generally support the policy but comment that the qualifications on installing renewable energy equipment requiring no adverse impact on the environment and</p>	<p>Most of the points raised are in line with government guidance, draft South East Plan and the Structure Plan and their incorporation into the policy and supporting text will improve the policy. The view of Fairview Homes does not accord with government policy.</p> <p>In December 2006 the government published draft guidance on 'Planning and Climate Change' and 'Building a Greener Future:</p>

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<p>people is unrealistic. They suggest it is better to say “no unacceptable effect”.</p> <p>Surrey County Council (93) support the policy but comment there should be reference to support Combined Heat and Power (CHP), paragraph 13.4 and Policy CC1 could be helpfully reordered to refer to energy efficiency measures first, and paragraph 13.6 could refer to the CO² reduction policy in the South East Plan. They also comment that the policy should refer to sustainable construction.</p> <p>Countryside Agency (84) comment the policy should encourage use of recycled construction material to reduce mineral workings and support sustainable waste disposal.</p> <p>SEERA (94) make the same comment on construction material and that CHP should be encouraged.</p> <p>RPS (106) on behalf of Fairview Homes object that the policy should only ‘encourage’ renewable energy not ‘require’ it.</p>	<p>Towards Zero Carbon’, and ‘Code for Sustainable Homes’. This sets out a clear direction for the significant raising of requirements on energy efficiency, renewable energy generation and sustainable construction. In view of this, further changes are made to reflect this both in the policy and justification.</p> <p>Recommend: Policy CC1 be amended by:</p> <p>1. Re-drafting the policy as follows:</p> <p>Policy CC1: Renewable Energy, Energy Conservation and Sustainable Construction</p> <p>The Council will support the provision of renewable energy, energy efficiency and promote sustainable development generally by:</p> <ul style="list-style-type: none"> i) Requiring residential development of one or more dwellings and other development involving new building or extensions exceeding 100 sq m to: <ul style="list-style-type: none"> a. optimise design, layout and orientation of the development to minimise energy use b. attain high energy efficiency and minimum impact on the environment - To at least Code for Sustainable Homes – 3 star or BREEAM ‘very good’ standard. c. include measures to provide at least 10% of the developments energy demand from on-site renewable energy sources ii) Encouraging the installation of renewable energy equipment to supply existing buildings iii) Encouraging appropriate freestanding renewable energy iv) Encourage high standards of sustainable construction including the use of recycled construction material. <p>2. Delete paragraphs 13.3 to 13.5 and insert new paragraph</p>

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		<p>11.11: ‘The government identifies the implications of climate change and the need to take action to address its causes as serious and urgent. It is aiming for zero carbon housing by 2016 by a staged progression of targets. This is supported by a Code for Sustainable Homes, which may become mandatory from April 2008, and other initiatives. The Code covers a wide range of sustainability issues including water conservation and recycling. As a minimum the Government expects 10% on site renewable energy generation and Building Regulations will require increasing standards of energy efficiency in construction. Whilst the government has yet to produce a Code for commercial development renewable technologies are equally effective and appropriate.</p> <p>3. Amend paragraph 13.6 (now 11.12) by adding the words “reduction in CO2 emissions and” after the word ‘support’ and adding the following to the end of the paragraph: ‘The Surrey Structure Plan sets a requirement for 10% renewable energy in larger residential and commercial developments’</p> <p>4. Add a new paragraph 13.6a (now 11.4): ‘The strategy is being developed at a time when national policy on the issue is developing quickly and the government is consulting on measures to accelerate the pace of change generally. The Council is therefore setting an approach which should be regarded as a minimum and which may be exceeded during the life of the plan in order to meet more stringent national standards.’</p> <p>5. Add a new paragraph after 13.8 as follows: “Recycling and or reusing construction material has an important role to play in reducing the amount of waste going to landfill and reliance on primary sources of</p>

	Representation	Response
		supply including minerals. The policy encourages the use of recycled construction material”.
39	<p>Policy CC2 – Location of Major Traffic Generating Development</p> <p>Staines Town Society (87) consider there should be a general presumption against development that generates large amounts of traffic</p> <p>The Highways Agency (68) supports the policy and looks to authorities to have supporting policies to ensure demand for car based travel generally is reduced. They comment that they want more details of the potential impact of proposals in the plan before commenting specifically on their traffic impact on the trunk road network. They require a transport model to assess the impact of the plan and therefore its soundness.</p>	<p>The form of wording the Staines Town Society seeks would in effect bar most forms of large development. This would be inappropriate as it could rule out development that is needed e.g. larger town centre redevelopment and larger housing schemes. That is why the policy seeks to locate such development at accessible locations where non-car based transport is readily available.</p> <p>In response to the Highways Agency’s concerns the Council has prepared a Transport Statement which has assessed the transport impact of both the Core Strategy and Policies DPD and the Allocations DPD. It has demonstrated the plans will not have an adverse impact on the trunk road network and the Agency has agreed with its findings.</p> <p>Recommend: No change</p>
40	<p>Policy CC3 – Traffic Impact of Development</p> <p>Surrey County Council (93) considers the policy should also include reference to developers being required, where necessary, to fund transport improvements and to all schemes having suitable space for servicing. Lower Sunbury Residents Association (118) consider the plan should have a strategic policy to take account of the cumulative impact of development. Green Street Action Group (124) considers that the proposals map should restrict development along busy main roads.</p>	<p>It is agreed the policy could also refer to servicing arrangements.</p> <p>The policy already refers to cumulative impact and the possible requirement of developers to provide for measures to address adverse effects. The case for limiting access from new development onto main roads or designing access points to take account of highway conditions needs to be considered in regard to individual proposals. The factors to be taken account of are set out in the policy.</p> <p>Recommend: the following be added to ‘(d) i. Servicing needs of the development”.</p>
41	<p>Policy CC4 – Parking Provision</p> <p>Both Surrey County Council (93) and the Highway Agency (68)</p>	<p>It is intended that parking standards and explanation of how they apply will be set out in a Supplementary Planning Document and until then the existing Parking Standards Supplementary Planning Guidance document will be used. The existing</p>

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	<p>consider the policy should be amended to refer to the application of 'maximum' parking standards. Surrey Police (109) comment that car parks should be built and maintained to the British Parking Association 'Safe Car Parks' standard. Mrs Cook (18) considers only multi-storey car parks should be provided.</p>	<p>guidance already makes clear the standards are a 'maximum'. It is agreed the principle of maximum standards could be helpfully reflected in the policy.</p> <p>The comment by Surrey Police is agreed however is a level of detail that is not appropriate for this document but for the proposed Supplementary Planning Document. The issue of whether a car park should be multi storey should be dealt with at the design stage of schemes.</p> <p>Recommend: At the end of the first sentence the following words be added "in accordance with its maximum parking standards".</p>
42	<p>Policy CC5 – Airtrack and Rail Access to Heathrow</p> <p>Miss George (91) considers more detail should be given on the disturbance the proposal would cause to residents including vibration and structural problems, visual impact, noise of trains, increased maintenance activity and safety of existing crossings if train numbers increase.</p> <p>Surrey County Council (93) interpret the policy as giving qualified support to the proposal and say it should also reflect current bids which seek to bring the project 'on stream' by 2011. It also supports the Council's general support for improvement to rail facilities to Heathrow.</p> <p>Green Street Action Group (124) suggest that putting the line underground would solve the environmental problems.</p> <p>SEERA (94) consider the text and policy should support the proposal in principle subject to appropriate mitigation of the environmental impacts. RSPB (125) support the Council's stance and note the need for the project to have an Appropriate Assessment in accordance with the 1994 Regulations and note that any proposal in the plan would require such an assessment.</p>	<p>The Council supports the principle of improved accessibility to Heathrow by non-car modes, including a rail link from the south. But there are grounds for strong objection to the Airtrack proposal on environmental grounds.</p> <p>The wording of the policy is quite clear, the Council will not make a decision on whether to support the proposal until detailed proposals are available which demonstrate that the environmental impacts can be overcome. The Surrey County Council interpretation that the Council supports Airtrack in principle is incorrect.</p> <p>So far the proposers of the scheme have not produced details of the precise alignment and design detail from which the Council can make a thorough and detailed assessment of impacts and state whether it could support the proposal. In addition to such information it would be essential to undertake a Sustainability Appraisal of the section of the Airtrack Scheme in Spelthorne. An Appropriate Assessment would also need to be carried out as it directly affects the Staines Moor SSSI which is an important feeding area for birds which resort to the South West London Water Bodies Special Protection Area.</p> <p>Irrespective of the Council's final view of the scheme a formal proposal for Airtrack could not be included within the LDF</p>

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		<p>without an SA and only if the Appropriate Assessment of the scheme were to demonstrate there were no adverse effects. Given the known potential adverse impacts of the proposal and the statutory requirements for appraisal/assessment which are dependent on detail yet to be produced by the schemes backers the Council consider it entirely proper to simply safeguard the route and decline to give it support.</p> <p>The concerns raised by Miss George are agreed and already covered within the Council’s published Planning Brief for The Airtrack Corridor – December 2002. Some additions to the lower case text of the plan could usefully reflect the impacts on residents, and a new last sentence to cover the fact that safeguarding will not now be referred to in the Allocations DPD.</p> <p>Recommend: The policy be amended by adding a final sentence ‘The route of Airtrack through Spelthorne will be safeguarded’. Paragraph 13.20 (now paragraph 11.20) bullet point 1 be amended by adding ‘and disturbance’ after ‘disruption’ in the first line and the addition of ‘and residents living near the track’ after ‘centre’ in the second line.</p>

Appendix B (iii)

PARAGRAPHS

Representation		Response
43	<p>Paragraph 2.8</p> <p>BAA (86) want the paragraph qualified to say that the reference to “over 4,800” Spelthorne residents being employed at Heathrow is an estimate.</p>	<p>The figure quoted is derived from surveys and qualifying the basis of the figure is unnecessary as it is not being presented as an exact figure.</p> <p>Recommend: No change</p>
44	<p>Paragraph 2.24</p> <p>Surrey County Council (93) want an addition which explains there are gravel reserves in Spelthorne and an explanation that the reserves contribute to meeting the County’s sub-regional apportionment for sand and gravel.</p>	<p>The purpose of the paragraph is to provide a general explanation of the geography of the Borough. The suggested addition deals with minerals policy issues which are the subject of the Surrey Minerals Plan, and it is unnecessary to repeat it in the Borough’s LDF.</p> <p>Recommend: No change</p>
45	<p>Paragraph 3.6 and 5.67</p> <p>Green Street Action Group (124) comment that the Local Transport Plan fails to deal with Surrey’s traffic problems.</p>	<p>The effectiveness or otherwise of the LTP is a matter for Surrey County Council and it is for groups to comment on this document when it is subject to consultation. LDFs are required to take account of LTPs and the paragraphs in the plan seek to reflect the policy directions it sets out.</p> <p>Recommend: No change</p>
46	<p>Paragraph 3.13</p> <p>Green Street Action Group (124) consider the plan should not have been prepared in advance of the latest housing needs survey.</p>	<p>The Council already has a detailed understanding of housing need and the latest survey is part of an on-going process of ensuring that understanding is up-to-date. The Council is satisfied that its draft plan is sound so far as its assessment of a continuing need for affordable housing, smaller dwellings and a growing demand for elderly person accommodation is concerned. Findings of the latest survey do not fundamentally change the extent and nature of need in the Borough.</p> <p>Recommend: No change</p>
47	<p>Paragraph 3.13</p> <p>Green Street Action Group (124) comment that they do not think the</p>	<p>The 2004 retail study of Spelthorne is based on detailed surveys of shoppers and provides a comparison to the 2001 survey as well as taking account of national changes in retail patterns e.g.</p>

	retail study on which the retail policies are based take account of changes in customer purchasing patterns in recent years.	use of internet and other research sources. It also includes changes over time in retail uses in the Borough's centres and the results of pedestrian surveys in Staines. Both the assessment and projection of relevant changes has been an integral part of this work. Recommend: No change
48	Paragraph 4.6 Surrey County Council (93) generally support the objectives of the plan.	Noted.
49	Paragraph 4.6 English Nature (73) want the plan to have objectives which specify the Core Strategy will contain policies to protect and enhance biodiversity on sites of national and international importance.	Objective (1) deals with biodiversity already and Policy EN10, as proposed to be amended, refers to sites of national and international importance Recommend: No change
50	Paragraph 4.6 – Objective 4 Green Street Action Group (124) want Kempton Park and Mineral Workings added to Heathrow and road traffic as a sources of noise.	The purpose of the paragraph was simply to identify the most major noise sources affecting the Borough as a whole. It is unnecessary to seek to be either extensive or exhaustive in the list to support the intent of the objective which is to minimise the impact of noise whatever its source. Recommend: No change
51	Paragraph 4.6 – Objective 7 Notcutts (74) – consider there is a greater need for houses than flats in the Borough.	The objective simply sets out an intention to meet needs by an appropriate mix of tenure, size and type of dwelling. It is not considered relevant for an objective to be more specific – that is for the policy. Recommend: No change
52	Paragraph 4.6 – Objective 11 Surrey County Council (93) consider that this objective on design should cross refer to Objective 2 on climate change. The	The objectives of the plan need to be applied as a whole. Climate change and biodiversity are dealt with in other objectives and therefore the suggested cross reference or repetition is unnecessary.

	Representation	Response
	Environment Agency (82) want the objective to refer to biodiversity issues.	Recommend: No change
53	<p>Paragraph 4.6 – Objective 13</p> <p>The Environment Agency (82) consider that this objective on flood risk should not simply seek to ensure development does not increase risk but also seek to reduce it.</p>	<p>It is agreed this objective could go further by giving a commitment to seek to reduce flood risk. It could go further still and commit to seeking to reduce flooding which is a cause of the risk.</p> <p>Recommend: Objective 13 be redrafted as follows:</p> <ol style="list-style-type: none"> 1. The objective be rephrased to read: “To seek ways to reduce flooding and its associated risks to people and property including ensuring development does not increase the risk” 2. The supporting text to the objective to add ‘reduce flooding’ added after ‘aims to’ in the second line
54	<p>Paragraph 4.6 – Objective 16</p> <p>Surrey County Council (93) object that this Green Belt objective does not also refer to improvement of the urban fringe and reference to the Green Arc project (already referred to at paragraph 12.39).</p>	<p>Objective 1 already deals with the issue of landscape improvement and cross references within objectives to more detailed matters is best dealt with in policy or lower case text.</p> <p>Recommend: No change</p>
55	<p>Paragraph 4.6 – Objective 19</p> <p>Surrey County Council (93) consider the references to Town Centres should include commitment to high density housing in Staines Town Centre</p>	<p>Staines Town Centre is heavily constrained by the flood risk area and whilst higher density housing may be achievable on certain sites it would be misleading to include the reference SCC suggest as it would imply scope throughout the town centre which does not exist.</p> <p>Recommend: No change</p>
56	<p>Paragraph 5.8</p> <p>Surrey County Council (93) consider a rephrasing is required to the last sentence to amend it from “aims to avoid increased risk of flooding” to “mitigate the impact of further development”.</p>	<p>The rephrasing neither reflects the intent of draft government guidance on seeking to reduce flood risk or the intention of the Council in its amended policy to seek the same for the Borough.</p> <p>Recommend: No change</p>

57	<p>Paragraph 5.10</p> <p>The Environment Agency (82) suggest references to flood risk assessment should also refer to there being no harm to people or property.</p>	<p>This is too detailed for this general reference to flooding but will be included in the revised Policy EN15 on flooding.</p> <p>Recommend: No change</p>
58	<p>Paragraph 5.17</p> <p>Surrey County Council (93) comment that in addition to the reference to a particular need for socially rented housing, reference should be made to intermediate (shared ownership) housing.</p>	<p>This general paragraph simply seeks to give a general picture of housing need in the Borough. Paragraph 8.9 in the housing chapter gives greater detail.</p> <p>Recommend: No change</p>
59	<p>Paragraph 5.24</p> <p>Surrey County Council (93) the text on monitoring housing provision should also refer to use of housing trajectories.</p>	<p>This is a detail for the Annual Monitoring Report where we already set out a housing trajectory.</p> <p>Recommend: No change</p>
60	<p>Paragraph 5.25</p> <p>Rugby Estates (114) object to this paragraph which explains the Council's contingency approach to housing provision if supply falls below requirements. The measures include compulsory purchase. They want the references to Compulsory Purchase Orders (CPOs) deleted as it will not be applicable in every case.</p>	<p>The guidance in this paragraph is further developed in paragraphs 8.5 and 8.6 and the contingency policy HO2. The policy makes clear they would only be used if needed. Their use is prescribed clearly in government guidance which in essence sees them as a last resort and only then when a compelling case exists. No further qualification is considered necessary.</p> <p>Recommend: No change</p>
61	<p>Paragraph 5.32</p> <p>BAA (86) want reference to growth of employment at Heathrow following opening of T5 should be qualified as in the longer term employment may fall.</p>	<p>The intention of the comment is to give a general picture of employment in the Borough and the role of Heathrow within this. BAA's point is unnecessary detail in this context.</p> <p>Recommend: No change</p>
62	<p>Paragraph 5.47</p> <p>Green Street Action Group (124) say reference to the role of Staines Town Centre for retailing fails to refer to development at</p>	<p>Whilst this paragraph does not attempt to identify development planned in surrounding towns this has been taken in to account in the retail study and in assessing the scope for future development in Staines.</p>

Representation		Response
	Walton.	Recommend: No change
63	<p>Paragraph 5.52</p> <p>Green Street Action Group (124) comments that this paragraph refers to services and facilities to meet community needs but not to the decline in hospital services.</p>	<p>Although LDFs should ensure future land provision for such things as hospitals, or funding from development where there would otherwise be physical capacity issues, the Primary Care Trust has not suggested there is a shortage of land or buildings for hospital provision. The health services provided within hospitals and the revenue funding for them is a matter for the PCT not the LDF.</p> <p>Recommend: No change</p>
64	<p>Paragraph 5.54</p> <p>SEERA (94) suggest this paragraph, which refers to infrastructure provision, should cover the list of infrastructure in the South East Plan Implementation Plan.</p>	<p>Whilst the list (Table 1) in the SEERA document is quite full it is not comprehensive and it covers some facilities not relevant to Spelthorne. It is considered best not to seek to define all possible infrastructure types, as this is considered unnecessary, but instead to retain the general phrase in Policy CS5 “services and facilities to meet the needs of the community”.</p> <p>Recommend: No change</p>
65	<p>Paragraphs 6.5, 6.9, 6.14, 6.15</p> <p>The Environment Agency (82) comment that the brief references to flooding in Staines, Ashford, Sunbury and Shepperton should be expanded to refer to the sequential test in draft PPS12.</p>	<p>The sequential approach to locating development is a way to avoid flood risk has been applied in the Council’s Strategic Flood Risk Assessment. It provides detailed information on the nature and extent of flood risk on the Borough. The proposed revised Policy EN16 and justification refer to the main flooding issues and considerations (See Ref 32 above).</p> <p>Recommend: No change</p>
66	<p>Paragraph 6.27</p> <p>The Environment Agency (82) want references to improving biodiversity referred to for all areas of the Borough and reflected in Section 6 which identifies the spatial implications of the Core Strategy for different parts of the Borough.</p>	<p>Policy EN10 gives clear commitment to create or improve habitats of nature conservation value and ensure new development contributes to a general improvement wherever possible. No further changes to Section 6 are considered necessary.</p> <p>Recommend: No change</p>

67	<p>Paragraph 9.4</p> <p>Miss Sheehan (96) states the list of designated employment sites should also include the Halliford Studios in Manygate Lane and also the commercial area of Shepperton. R. Bretts (117) object that their site at Littleton Lane is not identified. The Highways Agency (68) express concern about the identified sites at Hanworth Road, Spelthorne Lane, Northumberland Close and Long Lane and BP Sunbury as no detail of possible redevelopment is given.</p>	<p>The intention of ‘designating’ employment and commercial areas in the plan is to ensure sufficient employment land generally is retained and does not seek to necessarily protect individual business. For this reason larger well sited employment areas where a range of employment uses can or could take place are identified.</p> <p>The Bretts site at Littleton Lane has a legal agreement to cease the current commercial use in the next few years and in any case this site in the Green Belt is not appropriate for designation for employment use on a permanent basis. The Highways Agency has now agreed a Transport Statement for the LDF and no longer has concerns about the site referred to.</p> <p>Recommend: No change</p>
68	<p>Paragraph 10.12</p> <p>Arlington Properties (83) say the town centre car park study referred to should be subject to consultation including with the Two Rivers Partnership.</p>	<p>The study itself was to establish future needs. Liaison with parties over any future car park management decisions is not a matter for the LDF process.</p> <p>Recommend: No change</p>
69	<p>Paragraph 12.47</p> <p>English Nature (73) suggest the text should refer to working with the Surrey Wildlife Trust.</p>	<p>The Council already works with the Trust and consultation with them is referred to in saved policy EN21.</p> <p>Recommend: No change.</p>
70	<p>Paragraph 12.72</p> <p>Green Street Action Group (124) want noise contours for Heathrow to also cover Sunbury.</p>	<p>Published noise contours extend out over all areas where aircraft noise is above 57 Leq. Sunbury is outside this area.</p> <p>Recommend: No change as lower leq contours are not published.</p>
71	<p>Paragraph 12.77</p> <p>BAA (86) propose the paragraph which sets out the main limits on T5 should refer to the size limit on the 57 Leq noise contour.</p>	<p>The addition of the Leq information is agreed. The text (now paragraph 10.47) could also usefully reflect the latest capacity information.</p>

	Representation	Response
	Surrey County Council (93) comment that the assumed growth of Heathrow with T5 for 60 mppa to 90 mppa has in effect been altered by BAA in its Draft Interim Master Plan which accepts numbers could reach 95 mppa. (Current passenger levels are 67.6 mppa. – April 2006).	<p>Recommend: The following be added:</p> <p>a) End the first sentence after the word ‘airport’, delete the rest of the sentence and add a new sentence. “BAA in its Draft Interim Master Plan accepts passenger numbers could reach 95mppa with Terminal 5” “Air traffic movements in the year up to April 2006 were 67.6mmpa” and</p> <p>b) At the end of the last sentence in paragraph 12.77 add “and a 57 Leg noise contour area limit of 145 km²”.</p>
72	<p>Paragraph 12.78</p> <p>BAA (86) object to the last sentence which comments that the living environment in Stanwell Moor is only acceptable when, as a result of runway alteration, aircraft are not landing or taking off over the village. BAA suggests this is subjective and not all local residents are disturbed by aircraft noise.</p>	<p>The Council considers its observations of living conditions in Stanwell Moor to be objectively based on government guidance in PPG24 where in areas with high noise levels, such as those experienced at Stanwell Moor, residential development should normally be refused. Paragraph 12.78 is therefore considered to be a fair commentary on the environmental conditions those residents face.</p> <p>Recommend: No change</p>
73	<p>Paragraph 12.50,12.81 and 12.82</p> <p>Surrey County Council (93) support the Council’s commitment to continue to argue for the retention of runway alternation and its position on night flights and retention of noise preferential routes. BAA (86) object to night flights being described as potential sources of great disturbance. They say the use of the word is emotive and inconsistent with the government’s night flight regime.</p>	<p>Surrey County Council’s support is noted. BAA’s objection is not accepted as it seeks to diminish the actual disturbance caused and the importance of the issue to local people.</p> <p>Recommend: No change</p>
74	<p>Paragraph 13.3</p> <p>Surrey County Council (93) comment that the list of renewable energy types should also include solar thermal and hot water.</p>	<p>The definition is to be removed as it simply repeats what is in government guidance.</p> <p>Recommend: No change</p>
75	<p>Paragraph 13.18</p>	Agreed

	Surrey County Council (93) suggest that this paragraph, which lists plan objectives relevant to the policy on Airtrack and rail access to Heathrow, should also include references to Objective 2 on climate change and minimising harmful emissions.	Recommend: Objective 2 also be listed in paragraph 13.18 (now paragraph 11.1).
76	Paragraph 13.19 BAA (86) object to the use of the word “significant” in describing the impact of Heathrow related traffic on Spelthorne’s roads as it is unsubstantiated and reference should be made to the Heathrow Connect stopping services operating between Heathrow and Paddington. Surrey County Council (93) also refers to the Heathrow Connect service.	The Council consider its use of the word “significant” is appropriate in the context of the acknowledged scale of road traffic accessing Heathrow from the south. Reference to the Heathrow Connect service can be added (now paragraph 11.19). Recommend: Refer to “Heathrow Connect” after “Heathrow Express” in the third line.
77	Paragraph 13.22 Surrey County Council (93) say the Structure Plan should be identified in the paragraph as also proposing Airtrack.	Agreed. Recommend: Add the words “and Structure Plan” at the end of the first sentence (now paragraph 11.22).
78	Appendix 1 The Highways Agency (68) – the appendix defines existing shopping areas of Staines, Ashford, Shepperton and Sunbury Cross as well as employment areas. The Agency is concerned about the expansion of the retail area where there is insufficient public transport or the absence of potential transport improvements.	The plan is clear that the only expansion of retailing of any significance will occur in Staines Town Centre but only then within the existing retail area. The extension to the Elmsleigh Centre will for example improve the operation and attractiveness of the existing bus station. Recommend: No change
79	Appendix 3 Dr. Hairs Proprietaries Ltd. (107) objects that the consideration of alternative strategies for the plan has not involved looking at employment sites within the Green Belt and considering if they could be released to encourage more employment.	The plan clearly explains that both national, regional and strategic policy is clear about the permanence of the Green Belt. Whilst there are some isolated developed sites within it amending the boundary to enable the intensification of their use would be contrary to Green Belt policy. The option of releasing Green Belt land, and reasons for not doing so, has been properly assessed and the Council’s conclusions are sound.

Representation		Response
		Recommend: No change
80	<p>Glossary</p> <p>The Environmental Agency (82) ask that the following terms be defined in the glossary's:- Strategic Flood Risk Assessment, Flood Risk Assessment and Sequential approach / sequential text.</p>	<p>Agreed</p> <p>Recommend: SFRA be added but sequential approach/test is explained now at paragraph 5.15.</p>
81	<p>Appropriate Assessment</p> <p>English Nature (73) comment that the plan will need to be subject to this form of assessment.</p>	<p>Agreed. This work is now in hand and will be completed prior to submission of the Plan. Natural England is directly involved in the process.</p> <p>Recommend: Comment is noted.</p>
82	<p>Monitoring & Implementation</p> <p>SEERA (94) want to see details of how policies will be monitored and implemented.</p>	<p>This will be set out after each policy in the submission draft.</p> <p>Recommend: This will be set out in a new chapter on Implementation and Monitoring.</p>
83	<p>National Policy</p> <p>The Highways Agency (68) comment that the plan should include specific references to PPG13 and DTLR Circular 4/2001 so as to demonstrate the plan is sound.</p>	<p>All relevant documents are assessed in the Plans Policies and Programmes assessment which is part of the Sustainability Appraisal. That detail does not need to be repeated in the plan itself.</p> <p>Recommend: No change</p>
84	<p>Pages 8-14</p> <p>Surrey County Council (93) suggest this part of the plan could give further explanation of the County's role as the minerals and waste planning authority, including reference within Figure 2. Green Street Action Group (124) wants the LDF to address minerals and waste issues.</p>	<p>Recommend: Reference to be made in what is now paragraph 2.22.</p>
85	<p>Proposals Map</p>	<p>The draft intentionally did not repeat everything on the existing plan. The submission draft Proposals Map will shows 'changes'</p>

	Green Street Action Group (124) comment that the draft Proposals Map is not as comprehensive as the one in the adopted Local Plan.	to the existing Local Plan Proposals Map as required. Recommend: The comment is noted.
86	Page 9, Table 3 Surrey Wildlife Trust (105) comment that the list of key requirements from the draft South East Plan does not include reference to the need to avoid the net loss of biodiversity and to the importance of sustainable drainage.	The table seeks to summarise only the most significant spatial issues in less than one page. The matters referred to by SWT are addressed, by changes to other parts of the plan. Recommend: The comment is noted

Appendix B (iv)
ADDITIONAL POLICIES

Representation	Response
<p data-bbox="208 240 248 268">87</p> <p data-bbox="295 240 703 268">Proposed Additional Policies</p> <p data-bbox="295 309 685 336">Telecommunications Policy</p> <p data-bbox="295 378 1173 512">The Mobile Operators Association (MONO) (89), who represent the main telecommunications operators, object that there is no policy to give guidance on this subject. They propose the following supporting text and policy:-</p> <p data-bbox="295 547 1173 983">“Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document</p> <p data-bbox="295 986 387 1013">Policy</p> <p data-bbox="295 1054 1133 1118">Proposals for telecommunications development will be permitted provided that the following criteria are met:-</p> <ul style="list-style-type: none"> <li data-bbox="344 1160 1173 1289">i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. <li data-bbox="344 1331 1173 1391">ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to 	<p data-bbox="1205 240 2033 512">It is agreed a policy is needed to provide a basis against which proposals can be considered. The policy and justification suggested, however, fails to identify the weight given in government guidance to environmental considerations and that minimising impacts may not always lead to acceptable proposals as sometimes impacts will be unacceptable in principle and permission needs to be refused. The wording has also been simplified to make the requirements clearer.</p> <p data-bbox="1205 531 2033 595">Recommend: The following justification and policy to follow after Policy EN21:</p> <p data-bbox="1205 614 2040 1018">Mobile communications, including mobile phones, are used extensively by the public and business, and require a network of aerials and associated equipment to transmit signals. It is Government Policy to facilitate the growth of new and existing telecommunications systems whilst keeping the environmental impacts to a minimum. It places great emphasis on its well established national policies for the protection of the countryside and urban areas in particular Sites of Special Scientific Interest, Green Belts and areas and buildings of architectural or historic importance. It considers that in Green Belts telecommunications development is likely to be inappropriate unless it maintains openness.</p> <p data-bbox="1205 1037 2033 1342">Whilst some installations do not require planning permission the Council will expect those proposing new telecommunications equipment to have explored the scope for sharing existing facilities or buildings. Equipment should be designed to have the minimum impact and for there not to be unacceptable effects. Redundant masts or equipment will be required to be dismantled by the operator. Permission will be refused where there are unacceptable impacts particularly in or close to SSSIs, the Green Belt, listed buildings or Conservation Areas.</p> <p data-bbox="1205 1361 1865 1388">Policy EN22 (now EN17) – Telecommunications</p>

Representation**Response**

	<p>the external appearance of the host building.</p> <p>iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</p> <p>iv) if proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”</p>	<p>Proposals for telecommunications facilities will be supported where:</p> <ul style="list-style-type: none"> a) There is no existing mast, structure or building that can be used. b) Visual impact has been minimised through appropriate siting, design, materials, colour and landscaping and there is no remaining unacceptable impact particularly in sensitive areas. <p>Any redundant masts or equipment are to be dismantled by the operator.</p>
88	<p>Utilities Infrastructure</p> <p>Thames Water (66) consider that the requirements of utilities providers have not been taken into account. They propose a new policy ‘Utilities Development’.</p> <p>“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such adverse impact is minimised”.</p>	<p>The Council has approached all utility providers at the outset of preparing the plan including Thames Water. None have identified any general requirements or specific development related needs.</p> <p>Thames Water have a substantial land holding in the Borough used for water supply and treatment and it is already proposed (see under Policy GN1) that the existing text of the Local Plan which refers to their water treatment operations and the basis on which improvements will be supported be brought into the Plan. The policy suggested is unnecessary.</p> <p>Recommend: No change</p>

Appendix B (v)

OTHER MATTERS

89	<p>Other Matters <i>Movement related issues</i></p> <p>Lower Sunbury Residents Association (118) raise three movement related issues:-</p> <ol style="list-style-type: none"> 1) South West trains should be approached to run trains from Sunbury to Richmond. 2) Highways Agency to optimise traffic flows at Sunbury Cross. 3) Signage or other methods should be used to reduce ‘rat-runs’ through the area. 	<p>These are all matters which are for Surrey County Council to pursue given its responsibility for highways and public transport.</p> <p>Any action on public transport improvements would however be consistent with policies in the plan to encourage greater public transport use.</p> <p>Recommend: No changes to the plan</p>
	<p>Minerals</p> <p>Mr Hughes (64) objects that the plan has not taken into account the need to preserve mineral reserves.</p>	<p>This is a matter which is addressed in the Surrey Minerals Plan and the Borough’s LDF is not permitted to deal with the issue in its policies.</p> <p>Recommend: No changes to the plan</p>
90	<p>Glossary</p> <p>Surrey Wildlife Trust (105) suggest reference be made in the glossary to the terms, ‘Site of Nature Conservation Importance’ (SNCI) and ‘Special Protection Area’ (SPA).</p>	<p>Agreed</p> <p>Recommend: SNCI and SPA be included in the glossary.</p>

Appendix C

PROPOSALS

	Representation	Response
91	<p>General</p> <p>Staines Town Society (87) supports the proposals in principle as a sensible way to provide the necessary extra housing with minimal environmental impact. They consider proposals P5, P6, P9 and P10 to be too large/dense.</p>	<p>The comments are noted and comments on individual sites are dealt with under each site.</p>
92	<p>Proposal P1 – 28-44 Feltham Road, Ashford</p> <p>Mrs Archer (45) supports the proposal as the surrounding area is already residential and the impact of commercial activity needs to be reduced. Height and density should be in keeping with the surround area and there should be a good balance between private and affordable housing. Mrs Baker (52) objects as mixed use is desirable because current businesses provide employment. She is concerned the site includes 3 residential properties (2 flats & a bungalow) which could be blighted but could be excluded from the site. Thames Water (66) have no objection regarding waste services provided surface water flows are attenuated to ensure no increase in peak discharge from the site. Mrs Baxter (70) objects to the indicated density of the development due to the impact on an existing busy area and parking concerns. She wants less housing, adequate parking, privacy to be protected, any communal areas to be maintained and clarity on % of social housing. Notcutts Ltd. (74), Cemex (80), Ashford Sports Club (119) & Crane Road Properties (120) object to inclusion of the site as a proposal as deliverability is questionable due to lack of commitment of owners. Europa Business Consultancy (108) object on grounds of doubtful deliverability, loss of employment, no site for relocation – suggest site deleted or hold as a reserve.</p> <p>Mrs Cooksey (99) objects because the proposal should recognise that there are more than one workshop and yard on the site, and that there are 3 residential units. The proposal should include an explanation of residential owners' rights.</p>	<p>The site was originally identified in the 2001 Local Plan. The major commercial owner has no objection to the proposal and the owner of the smaller commercial area has only confirmed he has no plans for release in the near future. The site includes 3 residential units in the North East corner which whilst part of the site could be retained without prejudice in a comprehensive redevelopment of the remainder of the site because some of the existing commercial use is on their former gardens.</p> <p>The objection to inclusion of the site on grounds of deliverability is not accepted given the evidence from the owners. It is considered there are adequate opportunities in the commercial market for businesses and their site owners to find alternative business locations. Overall the Council is not reducing employment floorspace in the Borough as a result of the plans, policies and proposals.</p> <p>Any development must comply with the Council's general policies on affordable housing, design and layout (including overlooking) sustainable drainage and parking and would protect the concerns raised by adjoining residents.</p> <p>This site comprises busy commercial yards and buildings in a primarily residential area with which it is not compatible. Development for housing is both desirable and supported in principle by the owners although one party does not envisage implementation in the immediate future. The justification could usefully be added to acknowledge the site could be developed by retaining the existing 2 flats and bungalow. The description should refer to workshops and yards in the plural and the requirements of Thames Water.</p>

	Representation	Response
93	<p>Proposal P2 – 158/166 Feltham Road, Ashford</p> <p>Mrs Putman (1) objects – would prefer the site be left as it is or, if developed, for any access road not to be to the rear of adjoining residential properties. Concerned the development will increase noise and activity as the existing use only operates during business hours. Concern about overlooking and wants private housing. Mrs Burch (62) objects due to too many houses and access onto Feltham Road – wants houses set back from road. Wants landscaping on site and in wider area. Concerned about noise and inconvenience during construction. Mr Colfer (100) objects. Concerned about the loss of jobs, more traffic noise, lack of security, construction noise and activity, overlooking – doesn't want flats to the rear of the site. Considers there must be other more suitable sites.</p> <p>Ashford Sports Club (119) and Crane Road Properties (120), consider there is lack of sufficient certainty to include it as a proposal to meet housing needs in the next 5 years.</p> <p>Mrs Ward (121), supports the proposal as the warehouses are not pleasant. Overlooking should be avoided and any flats should only be two storey to retain privacy. Thames Water (66), no objection regarding waste services provided surface water flows are attenuated to ensure no increase in peak discharge from the site.</p> <p>Evans Property Group (58), owner of the site, supports the proposal and confirms it's available in the period 2008 – 2013. They propose the approximate density of the site should be 55 dph rather than the 50 dph in the draft plan, so as to give more flexibility and accord with the qualifications in Policy HO7 which acknowledges the scope for high densities where it is demonstrated it complies with Policy EN3. They also ask that the justification refer to the scope for flats and houses. With regard to open space provision, it is suggested the justification acknowledge policy CO2 and scope for off site open space provision or a commuted payment where on site provision is</p>	<p>Recommend: No changes to the proposal but refer to the scope to retain the three residential units and the requirements of Thames Water.</p> <p>It is clear from the comments of the owners that the site will be available in the first 5 years of the plan when adopted, therefore, claims of insufficient certainty for early development are not accepted.</p> <p>Whilst the employment use of the site would cease, it is considered there are adequate opportunities in the commercial market for businesses to find alternative premises.</p> <p>There are various concerns about development in terms of access, overlooking, activity levels, landscaping (there is very little at present) and concern about flats. Any development proposal would need to comply with the other policies of the emerging plan which would require these matters to be satisfactorily addressed for permission to be granted. It is considered inappropriate to indicate a higher density for this site in the absence of a detailed proposal to 'demonstrate' the acceptability as required by policy HO7. The site is large enough to accommodate an element of open space and therefore reference to off site provision or commuted payments are not relevant. The requirements of Thames Water can be added to the justification.</p> <p>Recommend: no alteration to the proposal but add reference to Thames Water's requirements.</p>

	Representation	Response
	not possible.	
94	<p>Proposal P3 – Land Adjoining Feltham Hill Road & Poplar Road, Ashford</p> <p>Mr Maskell (47), wants no more than 50 dwellings, Mr Tomlin (51), does not want too many dwellings, Mr Gillies (71), supports residential development but wants low density, Mr Thorne (57), wants no more than 70 dwellings. Mr Butler (112) supports residential development generally. Mr Tomlin (51), is concerned about more noise and pollution but Mr Gillies (71) thinks there will be less. Mr Maskell (47) & Mr Thorne (51) do not want access onto Poplar Road, which they say is already congested and suggest access only onto Feltham Hill Road or Junction Road, Mr Tomlin (51) & Mr Gillies (71) & Mr Butler (112) don't want access from Junction Road with Mr Gillies (71) suggesting access from Feltham Hill Road only. Mr Maskell (47) & Mr Thorne (57) are concerned that adequate parking is provided and Mr Thorne (57) also suggests a minimum of 2 parking spaces per dwelling, a development compatible with the 1990's development to the north and no loss of trees.</p> <p>Thames Water (66) have no objection regarding waste services providing peak surface water flows are attenuated and smaller diameter sewers are not compromised – multiple connections may be needed and a direct connection to a nearby larger diameter sewer. There are public sewers crossing the site which require approval for building within 3 metres.</p> <p>Cemex (80) say the site should be excluded as it may be difficult to relocate the occupier and Ashford Sports Club (119), Crane Road Properties (120) say the site should not be included as part of the first 5 years housing supply unless there is a planning application to demonstrate its deliverability.</p>	<p>This is a large site which is only partly occupied. The land owner supports residential and the representation indicating that it should be deleted or otherwise not assumed for early development are not backed by any evidence. There are various concerns about access, adequate parking, noise/traffic and trees. These are matters which are covered in general policies in the emerging plan and will need to be taken into account by a developer in preparing a detailed scheme to ensure compatibility with the surrounding highway and acceptability on all other respects. The points made by Thames Water can be reflected in the justification.</p> <p>Recommend: no alteration to the proposal but add reference to Thames Water's requirements.</p>
95	<p>Proposal P4 – Works Adjoining Harrow Road, Ashford – proposed for housing</p> <p>Notcutts (74), Cemex (80) & Europa Business Services (108)</p>	<p>No reason for the objection to the site due to proximity to an SNCI is given and no concerns have been raised by expert consultees on this issue. The Council has prepared a Transport Statement demonstrating that the scale of development</p>

	Representation	Response
	<p>Object to the principle of residential use. Ashford Sports Club (119) & Crane Road Properties (120) object to any suggestion that the site could be re-developed in the first 5 years of the plan due to the need to relocate businesses.</p> <p>Notcutts (74) and Europa Business Services (108) also object due to the sites proximity to a Site of Nature Conservation Importance (Princes Ski Club). Notcutts (74) object on grounds of poor air quality and Europa Business Services (108) on the principle of intensifying access onto the A30. Highways Agency do not agree that the traffic movements from the proposed 30 dwellings would have no greater impact in terms or trips to the site and turning movements than the existing use. The Agency requires evidence the impact will not cause any adverse impact in terms of safety or operational efficiency. Europa Business Services (108) also object that there has been no stakeholder assessment of the site.</p> <p>Mr Gonzalez (46) is concerned the scheme could result in the loss of a 15 foot wall at the bottom of this garden which provides security to his property.</p> <p>Thames Water (66) consider local sewer improvements may be required which would need investigation in the context of a specific scheme.</p>	<p>proposed will have no greater impact on the A30 trunk road in terms of traffic movements into and out of the site and the Highways Agency has agreed the statement.</p> <p>Following discussions with Thames Water they have now confirmed there are no known major network capacity issues in the vicinity of the site. They say the developer will need to assess in conjunction with them whether local improvement to the sewer network are required and if so ensure such improvements are implemented prior to the occupation of the site.</p> <p>Appropriate screening of the developed site will need to be considered as part of a detailed scheme and the need for particular consideration of design and layout is already reflected in the proposal.</p> <p>Recommend: The justification to the proposal to refer to the need to investigate the capacity of the local sewer system.</p>
96	<p>Proposal P5 – Steel Works & Builders Merchant, Gresham Road, Staines – proposed for housing</p> <p>Network Rail (130) have no objection in principle to the site being identified for housing but will require more detailed consideration on their part due to existing leases and the need for certainty of securing planning permission. Availability is likely to be in the second half of the plan period.</p> <p>Nottcutts (74) and Europa Business Services (108) object to the principle of developing the site, the latter also raise concerns about no land owner interest, no stakeholder assessment, and loss of builders’ merchants. Cemex (80), Ashford Sports Club (119) and Crane Road Properties (120) say the site could only be available in the later part of the plan period. Cemex (80) and Europa Business Services (108) object because the site is subject to flooding.</p>	<p>The current uses cause noise problems and there are access difficulties for large vehicles through a largely residential area. Residential use of the site is considered appropriate but due to noise from the railway only flats are deemed appropriate and therefore proposed. Network Rail, the owner, has no objection but considers availability is likely to be in the second half of the plan period. The site itself is largely outside of the 1:1000 flood area and there is a clear route from the site to a point outside the flood plain without going inside the 1:100 flood area. Water companies consider adequate supplies are available.</p> <p>The small lock up shops are physically in poor appearance and unattractive. Retention could not be justified if it prejudiced implementation of the scheme but their removal is not necessarily essential to physically implement the proposal.</p>

	Representation	Response
	<p>Staines Town Society (87) support the proposal as it removes a noisy use but seek lower density development of flats and houses and retention of the 3 kiosk shops by the station.</p> <p>Staines Preparatory School (92) and Mr Heaton (126) support more family houses and less flats.</p> <p>Mr Davies (88) and Staines Preparatory School (92) have concerns about traffic and the latter suggests more controls at the junction of Gresham Road & Kingston Road. Mr Lyden (63) has concerns about water supply issues.</p> <p>Thames Water (66) raise concerns about sewerage capacity.</p>	<p>Following discussions with Thames Water they have confirmed there are no known major network capacity issues in the vicinity of the site. They confirm the developer will need to assess in conjunction with them whether local improvement to the sewer network are required and if so ensure such improvements are implemented prior to the occupation of the site.</p> <p>Recommendation: Add reference to Thames Water's requirements</p>
97	<p>Proposal P6 – Council Offices, Knowle Green – proposed residential development</p> <p>Miss Park (2), Mr Lyden (63), Mr & Mrs Davies (88), Mrs Mutton (103) object to the proposal for a range of reasons including loss of Council car park for other users, additional traffic/congestion, loss of open space, flood risk, lack of health/school facilities locally, loss of privacy, change to character of area and more activity outside of business hours. Staines Preparatory School (92) have concerns about residents overlooking the school and want a set-down point for people taking/collecting children from school. Mr Lyden (63) considers the Council offices to be convenient for people to get to with easy parking and should not be relocated and Mr & Mrs Davies (88) consider any spare space should be re-let or used to provide homes for the elderly. Mrs Flutton (103) suggests the building should be re-let for business.</p> <p>Miss Brough (60) supports the proposal and more affordable housing but suggests conversion of the existing building and not rebuilding. Staines Town Society (87) see it as reasonable in principle but consider it to be too dense a development and would prefer conversion of the existing building as it is admired locally and a more sustainable use of materials.</p> <p>Miss Park (2) would like to see a car park for commuters. Thames Water (66) has no objection to the principle of the development. Notcutts (74), Cemex (80), Europa Business Consultancy (108),</p>	<p>Since putting this proposal forward the Council has reconsidered the principle of relocating its offices and decided instead to refurbish the existing premises with the intention of remaining in them for the foreseeable future.</p> <p>Recommend: the proposal be deleted</p>

	Representation	Response
	<p>Ashford Sports Club (119) and Crane Road Properties (120) object and consider the proposal should be deleted from the plan for a range of reasons including uncertainty of deliverability of the site and location in a flood risk area.</p> <p>Notcutts (74) also consider it is an inappropriate site for residential and are concerned about the loss of employment. Staines Preparatory School (92) considers there should be more family housing.</p>	
98	<p>Proposal P7 – Builders Merchant, Moor Lane, Staines – proposed for housing</p> <p>The owner Rugby Estates (114) support the proposal and ask that the proposed boundary include a small triangle of land in their ownership at the northern end of the site. They also seek greater flexibility in the number of units to ensure the site is developed to its maximum.</p> <p>Cemex (80), Notcutts (74) Europa Business Consultancy (108), Ashford Sports Club (119) and Crane Road Properties (120) object on grounds which cover doubts over deliverability, loss of employment/builders merchant, no agreement from the owner and flooding.</p> <p>Mr Moore (3), Mr Branton (50), Mr Leney (76) and Mr Watts (102) object on grounds of density, overlooking/privacy, surface water flooding, parking congestion in the area and increased noise levels.</p>	<p>The owner clearly supports the proposal and objections based on doubts over deliverability are unfounded.</p> <p>Local residents have raised a number of concerns which can be addressed by the detailed policies of the emerging plan. It is recommended that the site boundary is amended to reflect the full ownership of Rugby Estates but that the number of units be kept at “approximately 30” allowing the precise density to be subject to detailed design.</p> <p>The site is not within the 1:100 year flood risk area and there is a route to a point outside the flood plain without going through the 1 in 100 flood risk area. Some parts of Moor Lane experience short term surface water flooding after heavy rain – an issue found in many parts of the Borough. This tends to drain away fairly quickly and does not preclude development of this site.</p> <p>The proposal should make provision for a footway for Moor Lane along the entire boundary of the site with Moor Lane.</p> <p>Recommend: the proposal be retained with an amended site boundary and reference to the footway.</p>
99	<p>Proposal P8 – Riverside Works, Fordbridge Road, Sunbury – proposed for housing</p> <p>Europa Business Consultancy (108), Ashford Sports Club (119), Crane Road Properties (120) object and suggest the site should be</p>	<p>The site is owned by the Environment Agency which is actually promoting the redevelopment of the site. They also have a maintenance facility on Wheatley’s Eyot which is not part of the proposal site. Much of their activity has or will be relocated. Objections on the basis of deliverability are unfounded. The site</p>

	Representation	Response
	<p>deleted on grounds of no guarantee of availability in the short term, loss of employment and location in the flood plain. Europa Business Consultancy (108) also considers the site to be an unsustainable location and unsuited to small dwellings. Mr & Mrs King (4) raise concerns related to loss of privacy to adjoining properties, increased noise levels, but support the principle of residential if amenity/character of the area is protected and safe access and traffic speeds can be addressed. They query how many social units might be included. Mr McLeod (25) considers the site should be returned to the flood plain. Thames Water (66) has no objections.</p>	<p>is not within the 1:100 flood risk area and it is considered unrealistic to expect the site to be substantially lowered so as to function as flood plain. The supporting text of the proposal already reflects the need to pay special regard to the riverside setting and avoid adverse impact on adjoining properties which are physically at a lower level. Housing tenure would need to reflect the plan policies on affordable housing.</p> <p>Recommend: No change</p>
100	<p>Proposal P9 - Bridge Street car Park, Staines – proposed for housing</p> <p>Mrs Henigan – Showmens Guild of Great Britain (05), Mr Miller - Showmens Guild of Great Britain (06), Mr MacLagan (07), Mr Fuoco (08), Mr George (65), Mr & Mrs Davies (88), Mrs X (unable to read name) (127) and Europa Business Consultancy (108) object because of the loss of parking and impact on businesses, making parking more difficult and the risk of displacing car parking to the Hythe. Mr Chamberlain and Mr Clement (09) object as development would spoil views from Thames Edge and Europa Business Consultancy (108) object to the loss of a gap in development which enhances the area. Mr George (65) also objects on grounds of greater traffic congestion and loss of natural light to properties to the west. Both Mr Watson (24) and Mr George (65) are concerned about the need to keep access open along the towpath during construction and general disturbance from construction. Mr Watson (24) is generally concerned about the height of any development. Notcutts (74) want the site deleted as a proposal because the likely executive houses will not meet local needs and Europa Business Consultancy (108), Ashford Sports Club (119) and Crane Road Properties (120) want it deleted on grounds of deliverability and flooding. Staines Town Society support residential use subject to the findings of a parking study but at a lower density to ensure</p>	<p>The proposal reflects the intention to retain some parking. The general policies in the emerging development plan and the initial planning brief for the site provide clear guidance which requires a high standard of development and compatibility with the surrounding highway network. The towpath is a right of way and will need to remain open during construction. Following discussions with Thames Water they have confirmed there are no known major network capacity issues in the vicinity of the site. They say the developer will need to assess in conjunction with then whether local improvement to the sewer network are required and if so ensure such improvements are implemented prior to the occupation of the site.</p> <p>A flood risk assessment has been undertaken and the Environment Agency agree to the proposal as a dry route of escape from the site to a point outside the flood plain can be secured.</p> <p>Recommend: the proposal be retained with reference to Thames Water's requirements.</p>

	Representation	Response
101	<p>Proposal P10 – Elmsleigh Centre and adjoining land, Staines – mixed use</p> <p>Europa Business Consultancy (108) propose the housing element is deleted as the site is in the flood plain and because the housing is dependent on the retail element.</p> <p>Ashford Sports Club (119) and Crane Road Properties (120) object because the housing element could not be completed within the 5 year period 2008 – 2013.</p> <p>Staines Town Society (87) has no objection in principle subject to provision of an adequate bus station, library and museum, community centre and providing the development does not exceed the height of existing town centre buildings. They see no benefit in increasing retail floor space which will increase congestion, or in relocating the Council Offices which are accessible where they are. They consider the residential density too high and this element would need adequate amenity space and greenery. They say the scheme should not utilise the Memorial Gardens site. Mr & Mrs Davies (88) are concerned about enough parking being provided for residents and employees.</p> <p>Surrey County Council (93) object as there is no explicit response to accommodating the reinstatement of the Staines Chord.</p> <p>Thames Water (66) have various comments relating to the nature of connections that will need to be made to the local sewer network and capacity of a nearby pumping station.</p> <p>Elmsleigh developments Ltd (77) support the proposal.</p>	<p>This is a major development proposed in two phases, for which there is established retail demand via the Council's retail study. The implementation time scale of 2008 – 2013 reflects the findings of the study. The time scales are considered realistic. A flood risk assessment has established a dry route of escape from the site and on the basis of current 1 in 100 year flood levels, there is no objection from the Environment Agency. In response to some of the points made by the Staines Town Society part (2) of the proposal could be amended to include specific reference to the re provision of the Community Centre, library and museum (which is referred to in the planning brief). Design of the scheme as a whole would need to have regard to the design policies of the emerging plan and the planning brief which seeks, among other matters, to ensure the new building is no taller than those around it. A traffic impact assessment would be required to ensure adequate access and parking arrangements were provided. Relocation of the Council offices is not a specific part of the proposal. Surrey County Council's suggested reference to Airtrack is already covered by a separate safeguarding proposal (P12) for that scheme and no amendments to the Elmsleigh Centre proposal is considered necessary. Thames Water now confirm that, subject to the sewerage flow being spread to a number of surrounding sewers, including ones crossing the site, there need not be a sewer capacity issue. However, a detailed scheme and sewerage connections will need to be discussed and agreed with Thames Water. There is no known major network capacity issues in the vicinity of the site but one of the nearby pumping stations is close to capacity.</p>

	Representation	Response
		<p>Recommend: the proposal be amended to also refer to re-provision of the Community Centre, Library and Museum and the requirements of Thames Water.</p>
102	<p>Proposal P11 – Land West of Edward Way, Ashford – public open space</p> <p>Mr Town (11), Mr Miller (12), Mr Hewitt (13), Mr Adamski (14), Mrs Smith (15), Mrs Allan (75), support the proposal with Mr Hewitt adding that it should be closed at night and Mr Miller suggesting it also include a much larger area of unused land around it.</p> <p>Mr Gifford (48) objects because of fears that more people would park in Edward Way and the risk of anti-social behaviour in the open space.</p> <p>Mr Archer (72) is concerned about the close proximity of the boundary to the adjoining houses and suggests that any access from the A30 would be inappropriate for children.</p> <p>Mr Ridley (101) agrees in principle but wants reference made to the use of other unused land around the proposal site with scope to extend gardens on to it.</p> <p>Cemex (80), the owners, confirm that they are not opposed to the principle but it could be part of a comprehensive scheme.</p>	<p>There is mainly support for the proposal, although there are some reservations relating to the impact of the use on the adjoining residential area by parking and anti-social behaviour. Reference is also made to the future of a larger area of unused land adjoining the site.</p> <p>The area of the proposed site has been limited to that considered necessary to meet the needs of residents within a 400 metre catchment area south of the A30. Other unused land is owned by Cemex and Surrey County Council. This is green belt land for which the owners could bring forward appropriate green belt related proposals at any time. Extending gardens on to the area would not be an appropriate use of the green belt. The proposals supporting text already refers to the detailed design needing to safeguard the amenities of the adjoining residential properties and limitations on access.</p> <p>Recommend: No change.</p>
103	<p>Proposal P12 – Safeguarding for the Airtrack Corridor</p> <p>Mr Moore (16), Thames View Properties (26-44), Mr Hamdallah (49), Mr Hobbs (98) and Mr Watts (102) object to the proposal on grounds which include, noise of trains, noise of construction, pollution, loss of parking, impact on Staines Town Centre, and impact on Staines Moor. Tidegrove (17) object to a station being located in the position shown by BAA in a schematic map they have published but otherwise support the principle of Airtrack. Surrey County Council support the safeguarding of the proposal.</p>	<p>The Council is required to safeguard land for this proposal but is opposed to the scheme for all the reasons raised by objectors. The safeguarding proposal contains no detailed proposals for a station.</p> <p>Recommend: The safeguarding is retained with the Council's opposition continuing to be stated. For clarity the relevant detail on this safeguarding will be set out in the Core Strategy and Policies DPD in Policy CC4 and deleted from the Allocations DPD.</p>

Appendix D

ADDITIONAL SITE PROPOSALS

	Representation	Response
104	<p>St. David's School, Church Road, Ashford (104)</p> <p>Object to the plan because it has failed to remove much of their existing site from the Green Belt or otherwise identify it as a 'Major Development Site' (MDS) in the Green Belt and thereby allow infilling and redevelopment to proceed without any restriction on Green Belt grounds. The total school site extends to 9 ha and they want 2.34 ha removed from the Green Belt or otherwise designated as on Major Development Site. The proposal is supported by indicative proposals for additional replacement buildings to provide improved facilities for their primary school, hall/gym, music and laboratory facilities and all-weather sports pitch. They object to the plan because their needs and requirements, as well as those of the independent school sector generally, and a proposal to meet them have not been included. They consider such new facilities at St. David's should be an explicit plan objective and reflected in the strategy and policies of the plan. They consider the plan should support education provision at existing green belt sites. They also say that the brief summary of the character of Ashford at paragraph 2.14 should specially refer to the school including its role as a major employer. They consider the Sustainability Appraisal to be unsound because options for St. David's School have not been evaluated. They also consider the Core Strategy policy on community needs (Policy CS4) and detailed policy on providing community facilities (Policy C01) to be unsound because it does not support educational developments in the Green Belt.</p>	<p>Whilst the objector has referred to a range of policies and issues on the plan, they all centre on the issue of how extensions/partial redevelopment of facilities in the green belt to continue/improve an existing use should be addressed.</p> <p>The Council is 'saving' the existing Local Plan Green Belt policy and Green Belt boundary. To designate St. Davids School as an MDS could result in a substantial loss of openness and character of the area with substantial additional development. This site is part of a larger area of Green Belt providing an important role of separating Ashford from Greater London.</p> <p>The plans policies on meeting community needs are supportive of providing facilities where needed. Extensive public consultation was undertaken at both the 'Issues' stage in September 2004 and the 'Issues & Options' stage in September/October 2005. Only at this stage have St. David's School come forward to make representations about the plan. Their criticisms of the Council in not taking account of their needs are therefore unfounded.</p> <p>Within the application of Green Belt policy, national guidance provides for exceptions where 'very special circumstances' can be demonstrated. The school acknowledge this but consider it onerous to have to make such a case every time development is required.</p> <p>There is an added issue at this site and that is that the main building, chapel and entrance gates/railing are 'listed' structures. Any proposal must have particular regard to this consideration and, aside from Green Belt considerations, it would be inappropriate for the plan to indicate support in principle for a proposal which had not been developed to the required level of detail to enable the Council to meet its duty in being satisfied the</p>

Representation**Response**

	Representation	Response
105	<p>Kempton Park Racecourse, Sunbury (123)</p> <p>Racecourse Holdings Trust Limited (RHT) want the west part of the site which contains the grandstands and other buildings, and the main car park to be removed from the Green Belt and the following to be included both as a policy and provide the basis of a site specific proposal:</p> <p>“Policy – The Borough Council supports the role of Kempton Park Racecourse, within the area defined on the proposals map, in providing a recreation, leisure and entertainment facility, within the Borough, in order to ensure the continuing vitality and viability of this facility for the benefit of the local economy. Supporting text – In general terms, applications for additional equine support facilities, hotel and casino use, conference facilities, alternative leisure, recreation and residential development will be permitted, provided that the requirements of all other relevant policies of the plan are satisfied”.</p> <p>RHT consider the Council should make these changes to the plan because of the economic, social and environmental benefits the development could bring. No explanation of these benefits is given other than the list of development options they would like identified for the area.</p> <p>In support of the re-designation of the site they suggest that the undeveloped main car park adjoining Park Road/Staines Road West cannot perform a Green Belt function because it is not visible from the main open area of the racecourse.</p>	<p>character of the ‘listed’ structure were being properly preserved and enhanced.</p> <p>Recommend: No change to the Plan</p> <p>The whole of the Racecourse site is within the Green Belt and has been so since the first application of the policy in Spelthorne in 1956. The Local Plan Green Belt Policy and Green Belt boundary is being ‘saved’. The following comments are made in this context. The racecourse occupies much of what is a relatively narrow gap between this particular part of Sunbury and the outer edge of London which at this point is Hampton. RHT owns 76ha of the historic racecourse site area which actually extends to some 125 ha. The grandstand area and other buildings on the west side of the site only occupy some 3 ha (just 2.5%) of the total racecourse site.</p> <p>The racecourse itself is an open recreational/sporting use of this Green Belt site and is an appropriate Green Belt use. The Council has allowed essential facilities for other sport and recreation which preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. It is on this basis that over the years some building, redevelopment and improvements which directly support the primary use of the site as a racecourse have been permitted at Kempton Park. This is consistent with national Green Belt Policy set out in PPG2.</p> <p>The RHT proposed change to the draft plan is in effect to allow a wide range of development opportunities not directly related to horse racing activity on the open part of this Green Belt site.</p> <p>Recommend: No change to the plan</p>
106	<p>Land at West of Northumberland Close, Felstead Farm and Long Lane Recreation Ground, Stanwell – objection by</p>	<p>The existing Local Plan Green Belt Policy and Green Belt designation is being saved. National policy guidance’s makes clear that once defined the Green Belt should be permanent</p>

Representation	Response
<p>Fairview Homes (79)</p> <p>It is proposed this area of green belt is released for housing and employment development to ensure greater certainty of provision. This is related to an objection to the Council’s approach to Green Belt which is dealt with here rather than under Policy CS1 as it is essentially a site based argument.</p> <p>The objection puts forward a three stage approach. It is suggested the most fragmented green belt areas should first be identified – only Stanwell emerges from their assessment of such areas. They then prepare an assessment of all Green Belt in Stanwell and then undertake a sustainability appraisal of potential release sites. On this basis the above site is identified and put forward.</p> <p>The need for release is justified by the claim that the Council’s Employment land study and Housing Capacity Study have failed to consider the impact of the T5 decision and a possible third runway. It is supported by a claim that no housing sites are identified in Stanwell and therefore a disproportionate number of affordable housing units will be provided elsewhere in Spelthorne. An assessment of the site is made using the Councils sustainability objectives.</p>	<p>unless exceptional circumstances can be shown. Neither the draft South East Plan or Structure Plan propose any Green Belt release to meet housing needs in the London Fringe/Surrey area which includes Spelthorne.</p> <p>The Secretary of State’s Terminal 5 decision gave detailed consideration of that project and its implications and was an authoritative policy statement – it did not propose Green Belt land in adjoining areas be released. No decision on the expansion of Heathrow beyond Terminal 5 has been made and the draft South East Plan recognises that if this was proposed it would require a review of regional policy. It would not be for individual LDFs to make strategic decisions.</p> <p>The green belt assessment of the site wholly ignores the strategic function of the London Green Belt and the wider role of Green Belt in Spelthorne. In particular it ignores the role of Green Belt in securing a sustainable scale to the geographic extent of London and the support to this given by national, regional and Structure Plan policy.</p> <p>It is considered the Council’s research on Employment and Housing needs is soundly based and consistent with current National, Regional and Strategic Policy and the absence of any decision as to whether a third runway would be able to proceed due to environmental constraints.</p> <p>Part of the area proposed for development by Fairview Homes includes all of the Long Lane Recreation Ground. This site meets the public open space needs of a large area of Stanwell and its loss would be harmful not only to the character of this area but the well being of its residents. The inclusion of this land by the developer serves to illustrate the lack of soundness in the arguments they have put forward.</p>

Representation**Response**

		Recommend: No change to the plan.
107	<p>Bridge Street Car Park / Ashby House / 96-104 Church Street</p> <p>The owners of Ashley House – HSBC (122) have made objection to Proposal P9 on the following grounds:-</p> <ul style="list-style-type: none"> a) The site should be considered with the Ashby House site and the commercial site adjoining that site (Nos. 96-104 Church Street) which is accessed off Church Street. The combined area should be considered for either a Housing Brief or Action Area Plan. b) A mix of uses should be considered for the larger area – non residential uses have not been adequately considered e.g. retail, employment. A wholly residential use is objected to. c) The proposed use of residential and some parking on the Bridge Street site might prejudice the most appropriate use of the larger site. d) Object to inclusion of Ashby House within the town centres defined commercial area – but they also accept there may be a future employment role for the site. e) Concerned at the operational implications of redevelopment – they have 100 car parking spaces in the car park under licence. f) There has been insufficient early engagement with them about the future of the Bridge Street site but the preferred options stage is an opportunity to consider the area west of Bridge Street. 	<p>There is no requirement on authorities to consider proposals for every site on the Borough but rather to make a judgement as to where site specific guidance is necessary. The intention is that the core strategy and policies should provide the framework against which development proposal that came forward during the life of the plan can be considered. Site specific proposals are helpful where it is known larger sites may come forward and where specific guidance would be helpful or where a Council wishes, in the public interest, to proactively bring redevelopment forward.</p> <p>It has been known for some while that the Bridge Street site had scope for redevelopment and guidance would be needed not only on the appropriate use but also on issues such as flooding. Despite extensive consultation at both 'Issues' and 'Issues Options' stages HSBC had not previously come forward and even in the current submission do not actually said they contemplate redevelopment, of what is a relatively modern building, during the life of the plan. The owners of the Church Street site have made no representations redevelop, but a third party did make a suggestion at the Issues & Options stage. It is clear that the Bridge Street development will progress quickly due to the sites sale by the Council and it is this reality that needs to be faced and guidance now provided.</p> <p>The criticism of failing to engage with HSBC is not accepted as they have had ample opportunity to come forward at an earlier stage and have been aware of proposals through other discussions surrounding their licence to use spare parking spaces in the existing public car park.</p> <p>HSBC want their site excluded from the defined commercial area for the town although also comment it may well have a future employment role. They also criticise the Council for not having considered the need for additional employment in the town and possible retail use on this site. The Council is seeking to retain existing employment use in the town centre in particular</p>

	Representation	Response
		<p>within the existing area where the majority of that activity is located – hence the drawing of the commercial boundary. Ashby House is part of a relatively large office area on the west side of the town on Bridge Street, Church Street & Clarence Street and with its substantial floor space is an important and integral part of the commercial area and the employment development in the town centre as a whole. The Council’s retail study shows this would not be an appropriate area for additional retailing as it would not consolidate the retail offered in the existing core of the shopping area.</p> <p>HSBC suggest the three sites should be subject to a planning brief or Action Area Plan. There is clearly a lack of evidence that either the Ashby House or Church Street site will come forward or need guidance during the life of the plan and certainly not at the same time as the Bridge Street Car Park site. In any case policy EM1, EM2 and TC1 provide adequate guidance on the future use of both sites.</p> <p>Regarding Ashby House’s use of 100 parking spaces in the Bridge Street Car Park, the use is subject to legal agreements and any redevelopment must take account of these agreements.</p> <p>Recommend: No change to the Bridge Street proposal or employment area boundary.</p>
<p>108</p>	<p>Majestic House site, High Street, Staines TASHA Foundation in Spelthorne (69)</p> <p>TASHA Foundation occupies the building and are concerned about the noise of development affecting their counselling activities.</p>	<p>This site was included as a proposal site at the ‘Issues and Options’ but since deleted as it already has planning permission. As the permission involves demolition of the building, existing occupiers will have already had to relocate before work starts.</p> <p>Recommend: No change.</p>
<p>109</p>	<p>Land at Wheatsheaf Lane, Staines Strodes Foundation (110)</p> <p>Ask if the current proposal for public open space of 0.4 ha (1 acre) in the Local Plan will be implemented by the Council.</p>	<p>The current Local Plan proposes a small area of open space with children’s play equipment in the north east corner of a large field owned by the Strodes Foundation. At the ‘Issues and Options’ stage a proposal for public open space on a much larger area was consulted on. There was substantial local</p>

	Representation	Response
		objection and the proposal for open space by the Council will not proceed. On this basis the Council will not seek to implement the smaller proposal in the Local Plan.
110	<p>Rodd Engineering site, Govett Avenue, Shepperton Persimmon Homes (111)</p> <p>Persimmon Homes are concerned that the proposed residential use of the site included in the 'Issues and Options' consultation was not included in the 'Preferred Options' as the 'flooding' reason for excluding the site has been overcome.</p>	<p>The site was proposed for housing at the 'Issues and Options' stage and flooding was the only reason for not including it at the 'Preferred Options' stage. The site has been the subject of several planning applications and the flooding issue has since been overcome.</p> <p>The Council has previously supported residential development and its concerns in relation to the planning applications have been to density and design.</p> <p>The site can now be reinstated as a proposal and the Council consider a total number of 85 units appropriate.</p> <p>Since the base date for allocations in the Allocations DPD the site has secured planning permission. The Allocation will be retained in the event that the current permission is not implemented.</p> <p>Recommend: The site be included as a proposal for housing for "approximately 85 dwellings".</p>
111	<p>Notcutts Garden Centre, Staines Road, Laleham Notcutts (74)</p> <p>Notcutts propose that their site is included as a housing proposal in the plan so as to ensure sufficient provision is made including a variety of dwelling types.</p>	<p>This is largely an open site within the Green Belt with the current garden centre having been permitted to replace a previous centre on the site.</p> <p>The existing Local Plan Green Belt Policy and Green Belt designations is being 'saved'.</p> <p>Recommend: No change</p>
112	<p>Land South of Running Horse Public House and East of Vicarage Road Sunbury Cemex (80)</p> <p>Cemex consider the site should be a housing proposal and that this would not prejudice the function or integrity of the wider Green Belt of which the site is currently a part. They consider the site could also enhance children's play facilities.</p>	<p>The Local Plan Green Belt Policy and Green Belt designation is being 'saved'. Sufficient housing can be provided from within the urban area. The site adjoins an existing park with children's play facilities.</p> <p>Recommend: No change</p>

	Representation	Response
113	<p>Land West of Long Lane, South of Bedfont Road, West of Crane Road and North East Short Lane, Stanwell Europa Business Consulting (108)</p> <p>It is proposed this 12.45 ha Green Belt site is designated for mixed-use development including: housing (including affordable housing, elderly person housing and special needs) open space / recreation, local retail and community facilities, airport related uses including hotel, storage and distribution and B1 employment use. The proposal is justified on the grounds of housing requirements as they consider the Borough will not be able to meet the need for more employment including airport related demands. They consider that their site makes “little or no contribution to the purposes of the Green Belt” and has a poor appearance with no realistic prospect of enhancement. The proposal for principally airport related development is supported by Crane Road Properties (119).</p>	<p>The Local Plan Green Belt Policy and Green Belt designation is being ‘saved’. The housing and employment arguments are not accepted as the Borough’s housing and employment needs can be met from within the existing urban area.</p> <p>Recommend: No change</p>
114	<p>Former Mineral Working Site Bounded by Park Road, Southern Perimeter Road and Stanwell Moor Road, Stanwell Cemex (113)</p> <p>They consider that due to the sites proximity to Heathrow Airport and urban area of Stanwell it could be released from the Green Belt for commercial and business use without compromising wider Green Belt objectives. They see it as particularly suitable for airport related uses with ready access to the Southern Perimeter Road and capable of development without detriment to ecological interests at the sites western end.</p>	<p>The Local Plan Green Belt Policy and Green Belt designation is being ‘saved’. The Borough can meet its employment needs from within the existing urban area and release of Green Belt land for airport related development is not supported by either strategic planning documents or the Terminal 5 decision.</p> <p>Recommend: No change</p>
115	<p>Ash House and Mimosa Court, Littleton Road, Ashford Galliard Homes Ltd. (115)</p> <p>This 1.6 ha (4 acre) site is within an area designated for employment use but the objector proposes the employment area boundary be redrawn to exclude this particular site so it has no</p>	<p>The purpose of designating the Spelthorne Lane/Littleton Road/Ashford Road industrial / commercial area for employment use is to ensure that, along with a number of other designated sites, sufficient well located employment space is retained/provided in the Borough. It is accepted that over the life of a plan demands for employment space may fluctuate, but</p>

Representation**Response**

	land-use designation. They argue that designation as part of an employment site gives insufficient flexibility should the existing occupiers seek to relocate. They see a distinction between their site, which is in office use, and the adjoining part of the larger employment area which is in mainly industrial use.	in an area of high housing demand such space, once lost, cannot easily be re-provided. It is important for the plan to seek to strike the right balance between housing and employment provision and the Council are satisfied that it has. The employment designation does not prevent either redevelopment or change of use to other employment uses. Recommend: No change
116	Part of Ashford Sports Club, Woodthorpe Road, Ashford Ashford Sports Club (119) Consider there is a need to release Green Belt land in sustainable locations to meet the Borough's housing needs. They suggest deletion of the site could be considered as a natural rounding-off of the Green Belt at this point and note that the site is well situated in relation to local facilities and currently overgrown. Supporting information refers to the need for housing development to fund improvements to the Club's sporting facilities at its Short Lane ground at Stanwell – in particular improvements and a new astro-turf pitch which they hope could be used as part of the 2012 Olympics.	The Local Plan Green Belt Policy and Green Belt designation is being 'saved'. The Council is satisfied it can meet its housing requirements from within its urban area. It supports the improvement of sports facilities whenever appropriate but will not release Green Belt land to fund it. Recommend: No change
117	Part of Penton Hook Farm, Penton Hook Road, Staines Mr Deschamps (53) Mr Deschamps has indicated in response to the LDF consultation, he may be in a position to offer the Council a parcel of land of about 1 acre at the southern end of Penton Hook Farm next to Penton Hook Lock cottage. No particular use is proposed.	Penton Hook Farm is within the Green Belt so development of any part of the site would be inappropriate. Whilst the area of South Staines to the west of Laleham Road has less open space than ideal, residents objected to the Wheatsheaf Lane proposal. The Penton Hook site is not well related to that area to provide an alternative. There are no particular plan needs the site could meet. Recommend: No change
118	Sunbury Golf Centre, Charlton Lane, Shepperton Crown Golf (56) Crown Golf, the owners of the site, recognise it is in the Green Belt	Sunbury Golf Centre is located in the Green Belt and built development would be contrary to policy. It would therefore be inappropriate to identify it for any future development.

	Representation	Response
	but ask the Council to consider it as a potential future development option should development within the urban area be constrained or needs are required to be met elsewhere.	Recommend: No change
119	<p>Southern Farm, Horton Road, Stanwell Moor Development Planning Partnership on behalf of Landowner (128)</p> <p>This site of 2.17 ha is proposed for housing including affordable housing.</p>	<p>This site is in the Green Belt and has a mix of farm buildings and open land. The site is also within the 66 Leq contour where residential development would be refused on noise grounds. This site was previously rejected by the Inspector who conducted the 2001 Local Plan Inquiry.</p> <p>Recommend: No change.</p>
120	<p>Ashford Small Holdings, Clockhouse Lane and Chattern Hill Allotments, Feltham Road, Ashford Surrey County Council Estates (78)</p> <p>The land is owned by Surrey County Council. SCC Estates consider the Council has failed to identify enough available land in the urban area to meet its housing requirement and will therefore need to release Green Belt land. Failing that Green Belt land should be identified as part of a contingency plan. They consider the Council is over protective of the Green Belt. The small holdings and allotments cover 19 ha and they consider the Chattern Hill allotments particularly suitable for housing development or mixed use development. They see it as a logical extension of the urban area.</p>	<p>The site is part of a larger area of Green Belt which separates Ashford from Feltham. The Local Plan Green Belt Policy and Green Belt designation is being ‘saved’. The allotments are in active use. The Council’s study of allotments shows a need to retain those that exist. The Council is satisfied it can provide its housing needs from within the urban area and, in any case, has what it considers an appropriate contingency policy for providing further housing opportunities without resorting to releasing sites in the Green Belt.</p> <p>Recommend: No change.</p>
121	<p>London Irish Rugby Ground, The Avenue, Sunbury London Irish Holdings Ltd. (85)</p> <p>London Irish Holdings Ltd. Propose that their site should be allocated for housing. In support of this they consider the site is in a sustainable location within Sunbury. Public access to the site is limited and the current use consequently has limited community value. They consider a housing development could provide an</p>	<p>The site is within the urban area and designated as urban open space. The Council has a policy to protect such space as well as sites in open space, sport or recreational use generally. Previously a health club has been permitted here on the basis it would contribute to retaining the remainder of the site in its open use.</p> <p>Development for housing would involve the loss of sports</p>

Representation**Response**

	<p>element of retained open space. They also consider some of the proposed housing provision in the Borough to be uncertain or inappropriate due to a combination of loss of employment, flooding and multiple ownerships, hence uncertainty of delivery.</p> <p>They provide details confirming the current sites use for training both professional and amateur clubs of London Irish and home games for the amateur club. It is also used for the club's Academy sponsored by the RFU which is apparently very successful. Associated medical gym, treatment facilities and management facilities are provided on the site. They wish to relocate to a single site and fund this by housing development.</p>	<p>facilities which London Irish accept are well used and the loss of the site would be contrary to policy to retain such sites. Additionally, the site is protected because of its openness and contribution to the urban area. Development of the site for housing would be inappropriate for the above reasons.</p> <p>Recommend: No change.</p>
122	<p>Horton Mill, Horton Road, Stanwell Moor Halewood Chemicals Ltd. (107)</p> <p>Halewood Chemicals want their site removed from the Green Belt so as to remove existing Green Belt restrictions on the scale of new buildings that could be constructed on the site. The Green Belt restrictions are seen as inconsistent with policies to encourage the redevelopment of employment sites.</p>	<p>The site is within the Green Belt and outside of the settlement of Stanwell Moor.</p> <p>Recommend: No change</p>
123	<p>Land at Croysdale Avenue, Sunbury (former allotments site)</p> <p>Network Rail (130), the site owner, proposes it be released from the Green Belt and identified for housing as there is a housing need (given not all currently identified sites may come forward), the area is urban in character, release would not compromise the Green Belt and the adjoining Golf Course represents a more appropriate boundary to the Green Belt.</p>	<p>The site is in the Green Belt. The Local Plan Green Belt Policy and Green Belt designation is being 'saved'. The Council is satisfied it can meet its housing needs without releasing Green Belt land.</p> <p>Recommend: No change</p>

Appendix E

SUSTAINABILITY APPRAISAL

124	<p>Utilities Infrastructure</p> <p>Thames Water (66) object that there is not a specific sustainability objective related to the adequacy of utilities infrastructure to meet needs.</p>	<p>There is already a plan objective (No. 9) which states “ to ensure new development is supported by adequate provision of necessary infrastructure and services”. Strategic Policy CO5 also refers to new development contributing to the costs of improvements to infrastructure.</p> <p>There is an important distinction between the objectives and policies of the plan and the sustainability appraisal which is about the way things are provided. Sustainability objectives 16 and 17 cover issues of the use of resources and their quality and includes water supply and disposal.</p> <p>Recommend: No change</p>
125	<p>Flooding</p> <p>Thames Water (66) suggest SA objective No. 5 could be changed from ‘minimise the harm from flooding’ to ‘minimise the risk of flooding’</p>	<p>Again there is an important distinction between the sustainability objective of ‘minimising harm’ and the plan policies which seek to achieve this through policies of reducing flood risk. It is considered the SA objective appropriately expresses the sustainable outcome that is being sought.</p> <p>Recommend: No change</p>
126	<p>Paragraph 5.54</p> <p>Notcutts (74) object to paragraph 5.54 which describes their site as not being ‘previously developed land’ and they consider 5.12 should be amended to identify a benefit of developing the site as being “previously developed land” and reference to ‘no public open space being proposed’ to be deleted.</p>	<p>It is accepted that in terms of the current definition of “previously developed land” in PPG3, the structures and facilities to support the garden centre comes within the definition. However, the purpose of the paragraph was to identify sites which are largely open and where development would be harmful to their openness – which in this case is regarded as correct. It is also factually correct that the objection at the ‘Issues and Options Stage’ which proposed development of the site did not propose public open space.</p> <p>Recommend: No change</p>
127	<p>Option 1a & 1b</p>	<p>The objection pre supposes that restricting development to the urban area automatically causes a conflict with flood policy and</p>

Representation**Response**

	<p>Europa Business Consultancy (108) object to the SA on the basis that certain options for the plan which were consulted on at the ‘Issues and Options’ stage were rejected contrary to what they consider to be the most sustainable approach. They object to the Council’s choice of Option 1a, which is not to build in the Green Belt, because it will involve building in flood areas, involve the loss of employment resulting in out-commuting and negative impacts on biodiversity, urban open space, landscape character and parking. They consider that the scope to release Green Belt land – particularly Greenacre Farm, Stanwell has not been properly assessed on the medium to long term needs to expand Heathrow Airport.</p>	<p>other policy considerations. The policies and evidence base of the plan clearly show this not to be the case - development needs can be met from within the urban area without the harm suggested.</p> <p>It follows that there is no need to consider Green Belt releases. The suggestion that certain Green Belt sites could be released to secure sustainability benefits ignores the presumption in national, regional and Structure Plan policy that the Green Belt should be maintained. The Local Plan Green Belt Policy and Green Belt designation is being ‘saved’.</p> <p>Recommend: No change</p>
128	<p>Option 2a</p> <p>Europa Business Consultancy (108) – object that the claim in the plan that it is based on a presumption of restricting development in floodplains is incorrect because Policy CS1 uses the phrase “avoiding breach of flooding constraint” which they claim is a subtle use of language to enable a large proportion of housing to be directed into the floodplain of the River Thames. They say that development in the Green Belt which is not liable to flooding is more sustainable.</p>	<p>It is agreed the phrase “avoiding breach of flooding constraints” could be amended to more accurately convey the Council’s approach to flooding and improved wording is proposed (to be set out under Policy CS1 and EN15 (now LO2)).</p> <p>However, the lower case text of the plan and a proper reading of Policies CS1 and EN15 (now LO2) in their context makes clear the Council’s intention to avoid risks to people and property and comply fully with national flood policy.</p> <p>The objection is based on an incorrect understanding of the Preferred Options version of the Plan.</p> <p>Recommend: No change</p>
129	<p>Paragraphs 3.81- 3.82</p> <p>Europa Business Consultancy (108) – object that limiting housing provision to South East Plan requirements means the ability to increase the proportion of affordable housing in developments cannot be fully achieved and that this is an unsustainable restriction. The emphasis on smaller dwellings is also seen as unsound and unsustainable as there is an unproven link between smaller households and smaller dwellings.</p>	<p>The proportion of affordable dwellings that can be secured on individual sites is unrelated to total housing provision or number of sites that come forward. There is evidence of a need for more smaller dwellings and the policy approach was strongly supported by those responding to the consultation at the ‘Issues and Options’ stage.</p> <p>Recommend: No change</p>
130	<p>Paragraphs 3.83- 3.87</p>	<p>The objector ignores the full context of the chosen option which</p>

	Europa Business Consultancy (108) – the chosen plan option (3c) of keeping enough of the best commercial sites and allow others to be redeveloped for housing is not seen as sustainable as increase out-commuting from the Borough. Instead they propose making land available to attract new employment to the Borough.	takes account of the expected growth in employment. This option will not lead to a loss of jobs overall in the Borough during the plan period or necessarily result in greater commuting distances.
131	Paragraph 3.83 Europa Business Consultancy (108) – consider that improving labour skills is commendable but not a planning matter.	The Council consider the issue to be a legitimate consideration in the new spatial approach to planning. Recommend: No change
132	Paragraphs 3.92 -3.95 Europa Business Consultancy (108) – object to the choice of Option 15b to over 15a – 15a refers to seeking funding from developers for landscape improvement.	The references in paragraph 3.92 is a typing error – it should be Option 15a. Policy EN10 which elaborates on Policy CS6 makes this clear. Recommend: Correct typing error by referring to Option 15a in paragraph 3.92.
133	Air Quality Highways Agency (68) consider the SA should contain evidence on the effect of development proposed in the LDF on air quality with particular reference to the EU Air Quality Directive 1999/30.	The Council has now prepared a Transport Statement for the Core Strategy and Policies DPD and Allocations DPD which the Agency has agreed. It assesses the traffic implications of the plans and consequent air quality issues. It shows the plans themselves will not lead to a growth in traffic. Relevant air quality reports have been published by the Council. Recommend: No change.

Appendix F
ELMSLEIGH CENTRE EXTENSION BRIEF
and
BRIDGE STREET CAR PARK BRIEF

	Representation	Response
134	<p>Elmsleigh Centre and Southern Extension Planning Brief</p> <p>Spelthorne Museum (67) – welcome commitment to an improved museum but it needs a meeting space and room to store. Savilles (77) on behalf of clients support the proposal, Arlington Properties (83) suggest the required transportation assessment should involve other key town centre stakeholders and the scheme should enhance existing links with the High Street and Two Rivers. Europa Business Consultancy (108) object to the housing element on flooding grounds. Surrey Police (109) suggest reference is made to the ‘Safer Parking Award’ as a standard which parking facilities should meet. The Environment Agency (82) refer to the need for any proposal to be subject to a flood risk assessment and note the Council is proposing a Strategic Flood Risk Assessment of the Borough. It comments that there should be measures to address any increase in air pollution. They support the proposals for sustainable drainage. They comment that de-culverting Sweeps Ditch (which runs along the edge of the Elmsleigh surface Car Park) and incorporating green/living roofs into the scheme would help improve biodiversity.</p>	<p>The Council is satisfied that on the basis of current known flood risk there is a dry route of escape possible from the site and residential development is appropriate as an element of the scheme.</p> <p>The brief already makes clear the need for appropriate early consultation and liaising with Arlington Properties would be an important part of this – reference is already made in paragraph 5.22 to assessing the scope to improve the transport arrangements for the town centre as a whole. References to ‘Safer Parking Amends’ can be made in paragraph 5.12</p> <p>Sweeps Ditch was originally culverted when the level of what is now the Elmsleigh Surface Car Park was significantly raised when material from a railway embankment on the edge of the site was spread across it in the late 1960’s. It is unlikely that de-culverting is ever likely to be feasible or appropriate given the difficulties in the water level and ground level. Whether green roofs could be a realistic way of enhancing biodiversity is a matter which could only be assessed at the design stage and in the context of the form and location of facilities to provide renewable energy. It is not considered appropriate to make a specific requirement in the brief.</p> <p>It is intended to secure an improved museum facility overall by its co-location with the library. Precise requirements are more appropriately left to the design stage.</p> <p>Recommend: The need for parking to be at least to the ‘Safer Parking Awards’ be set out as a sub-point in paragraph 5.12. Otherwise no other changes.</p>

	Representation	Response
135	<p>Bridge Street Car Park, Initial Planning Brief</p> <p>HSBC (122) who own Ashby House have raised four objections and identified four things they want to see. There is some overlap with their representations on the Strategies and Policies and Proposal DPDs.</p> <p>Objections:-</p> <ol style="list-style-type: none"> 1. A planning brief should not be used to bring forward proposals – this should be through development plans. 2. Inadequate consideration of uses for the site. 3. No discussion with adjoining landowners to consider a more comprehensive approach. 4. Need to retain 100 Car park spaces for Ashby House. <p>They would like to see:-</p> <ol style="list-style-type: none"> 1. Discussions with HSBC 2. Wider consideration and justification of potential uses. 3. Mix use to be considered 4. Possible development with either sites. <p>The Environment Agency (82) welcomes the fact that the brief contains a Flood Risk Assessment. Europa Business Consulting (108) object that the brief proposal involves the loss of car parking, places development in the floodplain for which the route of escape is unproven and say there is no need for the development and that the Council should not be involved in speculative proposals of this nature.</p>	<p>The principle of development is dealt with under the LDF Proposals where most of the points raised by Europa Business Consultancy are also addressed.</p> <p>The flood risk issues are fully dealt with in the FRA attached to the brief, which is supported by the EA.</p> <p>The purpose of what was initially tilted on ‘initial’ brief was to enable early consultation. The document itself makes quite clear it is only amplifying the draft Proposal for the site in the Proposal DPD which was consulted on in parallel. There have been discussions with HSBC over car park issues and the brief is quite clear about the intention to retain a minimum of 100 spaces.</p> <p>The proposed residential use has been carefully considered and explained in the brief. HSBC ask for a larger site to be considered. The Bridge Street site is to be sold shortly and then developed but there is no firm indication that either Ashby House or other sites will actually come forward in the plan period. This would not prevent discussion on specific proposals if there are any in due course but at the time of preparing this plan they have not put any forward.</p> <p>The site has now been sold by the Council to a developer and development is likely to proceed before the current draft brief could be formally progressed through the statutory process as a Supplementary Planning Document. The Council has already agreed not to progress the brief.</p> <p>Recommend: No change is made to the current Initial Draft Planning Brief.</p>

Appendix G
PROPOSED AFFORDABLE HOUSING SPD
and
PROPOSED DEVELOPMENT CONTROL POLICIES SPD

Representation		Response
136	<p>Affordable Housing SPD</p> <p>No comments were received</p>	
137	<p>Development Control Policies</p> <p>Surrey Wildlife Trust (105) comment that this SPD should make reference to PPS9, Surrey Biodiversity Action Plan, Countryside and Rights of Way Act 2000, and to habitats and species of principle importance in England.</p>	<p>The purpose of Supplementary Planning Guidance is primarily to provide further explanations of the Development Plan policies. This can include appropriate cross-references to other policy and other documents.</p> <p>Recommend: The SPD include cross-references where appropriate.</p>
138	<p>Development Control Policies</p> <p>The Theatres Trust (116) suggest an SPD specifically on providing community facilities, particularly Arts and Culture.</p>	<p>The general policy on provision of community facilities will be elaborated on in the SPD to the extent that is necessary.</p> <p>Recommend: The comment be taken into consideration in drafting the SPD.</p>

Appendix H (i)
LIST OF CONSULTEES

List of Consultees at Regulation 26

Specific Consultation Bodies

Specific Consultation Bodies as per Town and Country Planning (Local Development) (England) Regulations 2004, SI No. 2204 and PPS12

- The Countryside Agency - South East Regional Office (now part of Natural England)
- Environment Agency – Thames Region
- English Heritage (Historic Buildings and Monuments Commission for England)
- English Nature (now Natural England)
- Strategic Rail Authority
- Highways Agency
- All relevant adjoining authorities
 - Surrey County Council
 - Greater London Authority (GLA)
 - Elmbridge Borough Council
 - London Borough of Richmond Upon Thames
 - London Borough of Hounslow
 - London Borough of Hillingdon
 - Runnymede Borough Council
 - Slough Borough Council
 - The Royal Borough of Windsor and Maidenhead
 - Wraysbury Parish Council
 - Horton Parish Council
 - Berkshire Joint Strategic Planning Unit
- Government Office for the South East (GOSE)
- South East England Development Agency (SEEDA)
- South East England Regional Agency (SEERA)
- Thames Water
- Three Valleys Water Plc
- British Gas Plc (North Thames)
- Relevant Electronic Communications Companies
- Surrey and Sussex Strategic Health Authority

Government Departments

- Home Office
- Ministry of Defence
- Department of Constitutional Affairs
- Department for Culture, Media and Sports
- Office of Government Commerce

GOSE who is one of the 'specific' contacts is also the first point of contact for the following government departments

- Department for Education and Skills
- Department for Environment, Food and Rural Affairs
- Department for Transport

-
- Department of Health
- Department of Trade and Industry
- Department of Work and Pensions

General Consultation Bodies

Individuals on consultation list

- Mainly residents of Spelthorne but can include anyone who wishes to join our contacts list.

Groups representing interests of the Community

- Amenity Societies
- Educational Organisations – all schools and colleges in Spelthorne, Learning and Skills Council
- Groups representing interests of elderly
- Groups representing interests of people with disabilities
- Groups representing interests of women
- Health/Social Care – includes hospitals, Primary Care Trust, medical centres etc.
- Local businesses and business organisations
- Race/ethnic groups – at national level
- Religious groups in Spelthorne, adjoining areas, regional and national level representing Christian, Islamic, Hindu, Sikh and Jewish faiths
- Residents Associations
- Sports/Leisure groups/organisations
- Youth Council and other groups representing interests of young people in Spelthorne

Other Groups with a direct interest in planning issues

- Developers, Planning agents and others interested in development sites within Spelthorne
- Environmental Groups with interests in conservation of natural or historic environment.
- Housing associations/organisations
- National organisations with interest in architecture, urban design, transportation etc. – like CABI, English Partnerships etc.
- Infrastructure providers e.g. National Grid
- Other local authorities
 - Epsom and Ewell Borough Council
 - Guildford Borough Council
 - Mole Valley District Council
 - Reigate and Banstead Borough Council
 - Surrey Heath Borough Council
 - Tandridge District Council
 - Waverley Borough Council
 - Woking Borough Council

Voluntary and Charity Groups – at local, regional and national level

Local Strategic Partnership (LSP) – Locally known as the Local Spelthorne Partnership, Spelthorne's LSP executive includes - Business representatives, Housing group representative, Police, Educational representatives, Health representatives, local Church representative, Amenity Society representative,

Residents Association representative, Youth representatives, Government Office for South East, Surrey County Council, Surrey Fire and Rescue Service, Voluntary Action in Spelthorne Now (VAIS), Age Concern and Spelthorne Borough Council.

People with interest in specific sites – Owners/occupiers of proposed sites and owners/occupiers of adjoining properties. In certain cases people from a wider area were consulted depending on scale and nature of the proposal.

Appendix H (ii)
COPIES OF LETTERS SENT

Copy of the letter sent to Specific Consultees

«Title» «FirstName» «LastName»	<i>Please reply to:</i>
«JobTitle»	Contact: Ms Preeti Gulati
«CompOrg»	Department: Strategic Directorate (Community)
«Address1»	Service: Planning and Housing Strategy
«Address2»	Direct line: 01784 446343
«Address3»	Fax: 01784 446362
«Street»	E-mail: p.gulati@spelthorne.gov.uk
«Town»	Our ref: 4/11/4/4
«County» «Postcode»	Your ref:
	Date: 28 April 2006

Dear «KnownAs»,

Spelthorne Development Plan – Preferred Options on Strategy and Policies and Proposals and Initial Consultation on Supplementary Planning Documents (SPDs)

I am writing to let you know that the Council has just published its 'Preferred Options' on Strategy and Policies and Proposals Development Plan Documents (DPDs) and is inviting people to make representations on them. We are also inviting initial comments on four separate Supplementary Planning Documents (SPDs), details of which are set out overleaf. The consultation on both the DPDs and SPDs runs from 4 May 2006 to 15 June 2006.

Consultation on Development Plan Documents (DPDs)

In September/October 2005 we consulted people on 'Spelthorne Development Plan - Options for the Future' using a special edition of the Borough Bulletin. The report on this consultation entitled 'Issues and Options consultation' is enclosed. We have now developed the **enclosed documents** listed below which we are consulting on:

-
1. Spelthorne Development Plan - Strategy and Policies (Preferred Options) –sets out the 'core strategy' of the new plan with vision and objectives for the Borough and includes all development control policies.
-
2. Spelthorne Development Plan - Proposals (Preferred Options) - sets out all site specific proposals (including proposed housing sites)
-
3. Final Sustainability Appraisal Report – prepared in parallel with the above documents and contains an assessment of them against a set of social, environmental and economic objectives.
-

Other supporting documents

The DPDs contain relevant background information but additional information is set in the supporting documents listed below. These documents have informed the DPDs and are available free to view/download on our web site www.spelthorne.gov.uk.

-
1. Affordable Housing Study
-
1. Economy and Employment Land Study
 2. Housing Capacity Study 2005
 3. Open Space, Sport and Recreation Study
 4. Population and Social Characteristics of Spelthorne
 5. Spelthorne Retail Study – 2004
-

Consultation on Supplementary Planning Documents (SPDs)

As mentioned above we are also carrying out an initial consultation on four SPDs, two of these are in a document form and are:

-
1. Initial Draft - Elmsleigh Centre Western and Southern Extension Planning Brief
 2. Initial Draft - Bridge Street Car Park, Staines Planning Brief
-

In addition you are invited to give us initial comments on two forthcoming SPDs. The scope of these has not been finalised and views on issues that should be covered are welcome.

-
1. Development Control Policies SPD – will provide further detailed guidance on the application of some development control policies including design of new development, advice on historic buildings, parking standards and contributions from new development towards improvements to infrastructure and services.
 2. Affordable Housing SPD – the SPD will provide detailed guidance on Policy HO3 in the Strategy and Policies DPD on the provision of affordable housing.
-

How to comment on both DPDs and SPDs

To help you make comments there is a single representation form (enclosed) to make representation on any of the consultation documents listed in this letter. **Please use a separate representation form for each document, proposal and/or issue you would like to make a representation on** (please either copy the form as necessary or let me know if you need more).

All the documents mentioned in this letter along with an on-line representation form are available on our website www.spelthorne.gov.uk. They are also available for inspection during normal opening hours at the front reception of Council Offices and public libraries in the Borough. The opening times are set out in the enclosed note entitled “Proposals Matters”.

What happens next?

Your comments will help the Council prepare the ‘submission’ DPDs which will be submitted to the Secretary of State for independent examination and will be consulted on around the end of this year. Formal drafts of the four SPDs will also be published at the same time. We will write to you again at that stage

Finally, we have a number of people and organisations on our contacts list who receive information from us by e-mail rather than post. This means we can attach links to all the relevant documents in the e-mail which makes it easier for people to see the document we are consulting on. This also helps us reduce our postage costs. If you have not already given us your e-mail address and would like to be contacted by e-mail in the future please let me know by e-mail, phone or letter providing your name/organisation name and e-mail address.

Please let me know if you need more information.

«Salutation»



Preeti Gulati
Planning Officer

Copy of letter sent to General Consultees

«Title» «FirstName» «LastName»	<i>Please reply to:</i>
«JobTitle»	Contact: Ms Preeti Gulati
«CompOrg»	Department: Strategic Directorate (Community)
«Address1»	Service: Planning and Housing Strategy
«Address2»	Direct line: 01784 446343
«Address3»	Fax: 01784 446362
«Street»	E-mail: p.gulati@spelthorne.gov.uk
«Town»	Our ref: 4/11/4/4
«County»	Your ref:
«Postcode»	Date: 28 April 2006

Dear «KnownAs»,

Spelthorne Development Plan – Preferred Options on Strategy and Policies and Proposals and Initial Consultation on Supplementary Planning Documents (SPDs)

I am writing to let you know that the Council has just published its 'Preferred Options' on Strategy and Policies and Proposals Development Plan Documents (DPDs) and is inviting people to make representations on them. We are also inviting initial comments on four separate Supplementary Planning Documents (SPDs), details of which are set out overleaf. The consultation on both the DPDs and SPDs runs from 4 May 2006 to 15 June 2006.

Consultation on Development Plan Documents (DPDs)

In September/October 2005 we consulted people on 'Spelthorne Development Plan - Options for the Future' using a special edition of the Borough Bulletin. We also consulted on specific sites at the same time. The responses have helped us in developing the documents listed below which we are now consulting on. We have also published a report on the previous consultation entitled 'Issues and Options consultation'.

1. Spelthorne Development Plan - Strategy and Policies (Preferred Options) –sets out the 'core strategy' of the new plan with vision and objectives for the Borough and includes all development control policies.	£15
2. Spelthorne Development Plan - Proposals (Preferred Options) - sets out all site specific proposals (including proposed housing sites)	£5
3. Accompanying Sustainability Appraisal– prepared in parallel with the above documents and contains an assessment of them against a set of social, environmental and economic objectives.	£20

Consultation on Supplementary Planning Documents (SPDs)

Supplementary Planning Documents or SPDs expand on policies already set out in the development plan documents. Unlike development plan documents these are not subject to independent examination.

As mentioned above we are also carrying out an initial consultation on four SPDs, two of these are in a document form, and are:

1. Initial Draft - Elmsleigh Centre Western and Southern Extension Planning Brief	£5
2. Initial Draft - Bridge Street Car Park, Staines Planning Brief	£5

In addition you are invited to give us initial comments on two forthcoming SPDs. The scope of these has not been finalised and views on issues that should be covered are welcome.

-
1. Development Control Policies SPD – will provide further detailed guidance on the application of some development control policies including design of new development, advice on historic buildings, parking standards and contributions from new development towards improvements to infrastructure and services.
 2. Affordable Housing SPD – the SPD will provide detailed guidance on Policy HO3 in the Strategy and Policies DPD on the provision of affordable housing.
-

How to comment and availability of documents

More information on the current consultation as well as other supporting documents and all the documents mentioned in this letter are available free to view/download on our website www.spelthorne.gov.uk.

To help you make comments there is a single representation form (enclosed) to make representation on any of the consultation documents listed in this letter. **Please use a separate representation form for each document, proposal and/or issue you would like to make a representation on.** Alternatively, the form can be downloaded/submitted on-line via our website.

The documents are also available for inspection at the front reception of the Council Offices and public libraries in the Borough during normal opening hours as shown in the enclosed note entitled 'Proposals Matters' which deals with consultation arrangements. You can purchase printed copies of the documents over the phone by debit/credit card, please ring 01784 451449 or send us a cheque for the right amount made payable to Spelthorne Borough Council. Alternatively the documents can be purchased from the front reception at Council Offices. As we work on a 'cash with order' basis only we would need the payment before we can post the documents to you.

What happens next?

Your comments will help the Council prepare the 'submission' DPDs which will be submitted to the Secretary of State for independent examination and will be consulted on around the end of this year. Formal drafts of the four SPDs will also be published at the same time. We will write to you again at that stage

Finally, we have a number of people and organisations on our contacts list who receive information from us by e-mail rather than post. This means we can attach links to all the relevant documents in the e-mail which makes it easier for people to see the document we are consulting on. This also helps us reduce our postage costs. If you have not already given us your e-mail address and would like to be contacted by e-mail in the future please let me know by e-mail, phone or letter providing your name/organisation name and e-mail address.

Please contact me if you need more information.

«Salutation»



Preeti Gulati
Planning Officer

Copy of e-mail sent to those who requested to be notified of consultations electronically.

From: Gulati, Preeti
Sent: 02 May 2006 17:52
Subject: Consultation on Spelthorne Development Plan - Preferred Options

This email is to let you know that the Council has just published its 'Preferred Options' on Strategy and Policies and Proposals Development Plan Documents (DPDs) and is inviting people to make representations on them. We are also inviting initial comments on four separate Supplementary Planning Documents (SPDs), details of which can be found on our website. The consultation on both the DPDs and SPDs runs from 4 May 2006 to 15 June 2006.

We may have emailed you in September 2005 to consult on 'Options' for the Plan. If you took part in this consultation and would like to find out the Council's response to your comments, you can view them in a document entitled 'Report on Issues and Options Consultation'.

You can view or access all documents by clicking on the links under 'current consultations' via the link to the LDF web page which I have inserted below.

http://www.spelthorne.gov.uk/environment___planning/planning/env_planning_localplan/env_planning_ldf.htm

Please note that some documents may not be available till the 4 May 2006, the start date of the consultation.

Please let me know if you have any queries.

Yours sincerely,

Preeti Gulati
Planning Officer

Spelthorne Borough Council
Council Offices
Knowle Green
Staines TW18 1XB
☎: 01784 446343
Web: www.spelthorne.gov.uk

Example of letter sent to neighbouring residents of Proposal sites

A similar letter was sent to the owner/occupier of the sites

The Owner/Occupier	<i>Please reply to:</i>
«NameCompany»	Contact: Geoff Dawes
«Address1»	Department: Strategic Directorate (Community)
«Address2»	Service: Planning and Housing Strategy
«City»	Direct line: 01784 446397
«State»	Fax: 01784 446362
	E-mail: g.dawes@spelthorne.gov.uk
	Our ref: 4/11/4/2/2
	Your ref:
	Date: 28 April 2006

Dear Sir/Madam

Spelthorne Development Plan – Proposals (Preferred Options) Land adjoining Feltham Hill Road and Poplar Road, Ashford

The Council has just published its 'Preferred Options' on its Strategy and Policies and Proposals for the development plan and is inviting people to make representations on them. We are writing to you because you either own/occupy a site or are located close to a proposal for housing identified as a 'preferred option' in the plan making process.

A map showing the boundary of the proposal close to you and an extract of the relevant page from the 'Proposals (Preferred Options)' document, including a justification for inclusion of the site, are enclosed so that you can see what is proposed.

In September 2005 we consulted owner/occupiers and people adjoining/close to sites we were considering taking forward as proposals in the development plan. We have considered all the comments received and have now identified sites we want to take forward in the development plan. These are set out in 'Spelthorne Development Plan - Proposals (Preferred Options)' document. If you made any comments in the last consultation or would like to find out more about the comments we received and the Council's response to them, you can find them in a recently published report entitled 'Report on the Issues and Options Consultation'.

How to comment and availability of documents

The consultation runs from 4 May 2006 to 15 June 2006 and you can comment on the current consultation by filling in the enclosed form and sending it back to us. You can also fill in the form on-line which, along with all the above mentioned documents, is available on our website www.spelthorne.gov.uk. **Please use a separate form for each proposal/or issue you would like to make comments on and tick on 'Proposals – Preferred Options' at the start of the form as this form is being used for consulting on other planning documents as well.**

The documents can alternatively be inspected during normal opening hours at the front reception of the Council Offices and all public libraries in the Borough. Printed copies of the document are available for sale. You can pay for the documents over the phone by debit/credit card please ring 01784 451449 or send us a cheque for the right amount made payable to Spelthorne Borough Council. Alternatively the documents can be purchased from

the front reception at Council Offices. As we work on a 'cash with order' basis only we would need the payment before we can post the documents to you.

Spelthorne Development Plan - Strategy and Policies (Preferred Options)	£15
Spelthorne Development Plan Proposals – Preferred Options	£5
Spelthorne Development Plan Report on Issues and Options Consultation (September 2005 – November 2005)	£10

What happens next?

The Council will consider the comments received and use them to help us decide which sites to take forward in the 'submission' document, which will be submitted to the Secretary of State for independent examination around the end of the year. We will write to you again with more details at the time.

Finally, we have a number of people and organisations on our contacts list who receive information from us by e-mail rather than post. This means we can attach links to all the relevant documents in the e-mail which makes it easier for people to see the document we are consulting on. This also helps us reduce our postage costs. If you have not already given us your e-mail address and would like to be contacted by e-mail in the future please let me know by e-mail, phone or letter providing your name/organisation name and e-mail address.

Please contact me if you have any queries relating to the proposal site.

Yours faithfully



Geoff Dawes
Senior Planning Officer

Example of letter sent to neighbouring residents of an excluded Proposal site.

A similar letter was sent to the owner/occupier of the site.

The Owner/Occupier
«NameCompany»
«Address1»
«Address1»
«City»
«State»

Please reply to:
Contact: Geoff Dawes
Department: Strategic Directorate (Community)
Service: Planning and Housing Strategy
Direct line: 01784 446397
Fax: 01784 446362
E-mail: g.dawes@spelthorne.gov.uk
Our ref: 4/11/4/5
Your ref:
Date: 28 April 2006

Dear Sir/Madam

Spelthorne Development Plan – Proposals (Preferred Options), Excluded Sites Land at Wheatsheaf Lane, Staines

The Council has just published 'Preferred Options' on its Strategy and Policies and Proposals for the development plan and is inviting people to make representations on them. We are writing to you because you own/occupy a property close to 'Land at Wheatsheaf Lane, Staines'.

In September 2005 we consulted all owners/occupiers of properties within 400m of land at Wheatsheaf Lane. The land was identified by the Council to meet a shortfall of open space in the area and to meet a local need. A copy of the site plan is set out overleaf. We have considered all the comments received and have now identified sites we want to take forward in the development plan to support the core strategy and these are set out in 'Spelthorne Development Plan - Proposals (Preferred Options)' document. With regards to Wheatsheaf Lane a large number of issues were raised in the previous consultation. There was substantial opposition with only very limited support for the proposal. A summary of the numbers responding is set out below.

Support/No Objection	Object	Comment Only	Total responses
27 (22%)	89 (72%)	7 (6%)	123 (100%)

In addition there was a petition with 504 signatures objecting to the proposal.

Given the clear opposition to the proposal from a majority of local people the proposal will not be taken forward in the development plan.

A report on the previous consultation titled 'Report on the Issues and Options Consultation' has been published. If you made any comments in the last consultation or would like to find out more about the comments we received and the Council's response to them, you can find them in this report.

All the documents mentioned in this letter can be viewed/downloaded from our website www.spelthorne.gov.uk. The documents can alternatively be inspected during normal

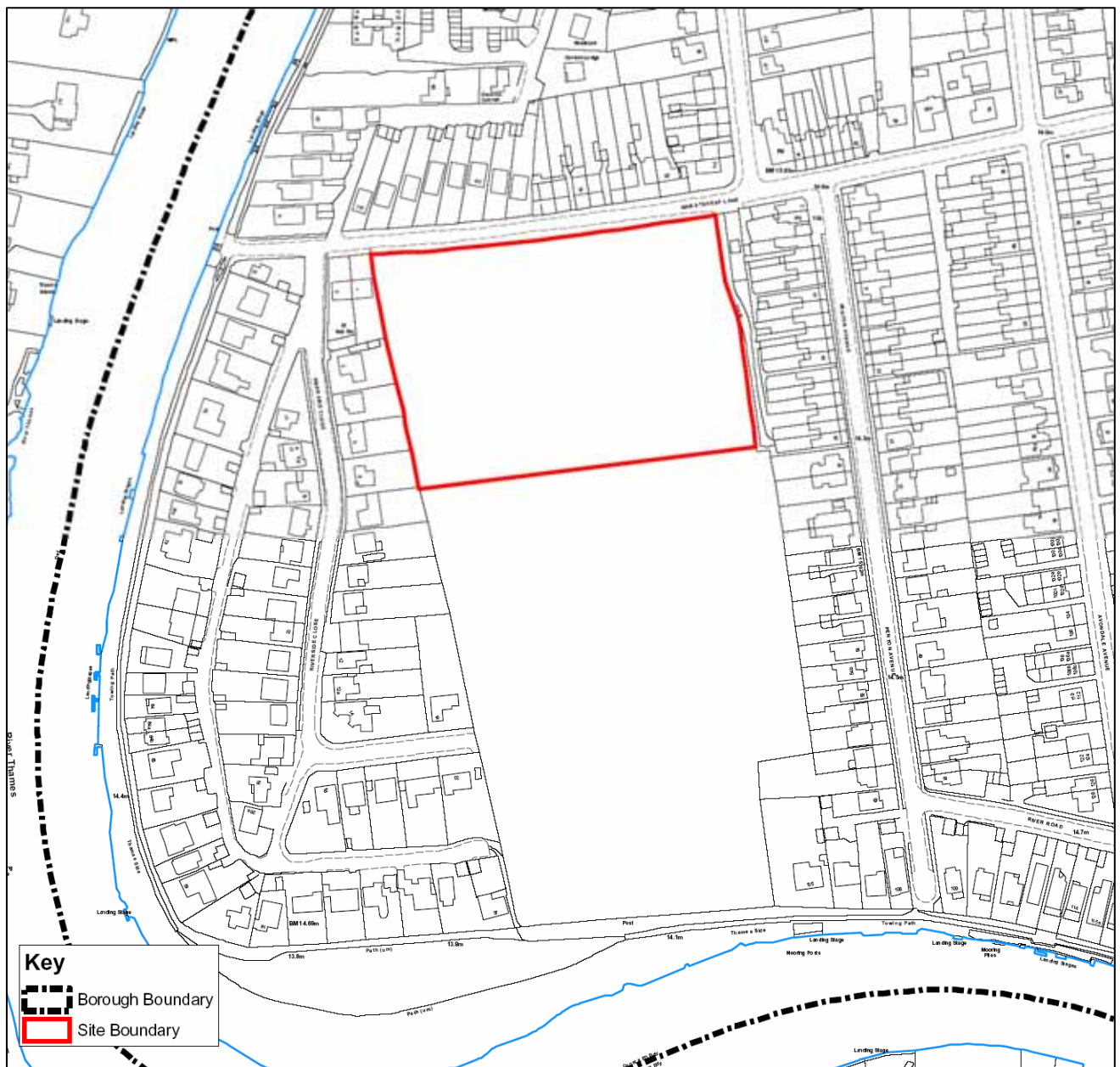
opening hours at the front reception of the Council Offices and all public libraries in the Borough. If you wish to purchase a printed copy of any of the consultation documents please ring 01784 451499.

Please contact me if I can be of any further assistance.

Yours faithfully



Geoff Dawes
Senior Planning Officer



Appendix H (iii)
COPY OF STATUTORY NOTICE

Notice published in the Surrey Herald Series on 3 May 2006

Spelthorne Development Plan Regulation 26 of The Town and Country Planning (Local Development) (England) Regulations 2004

Consultation on
Spelthorne Development Plan - Strategy and Policies (Preferred Options) and Proposals
(Preferred Options)

Spelthorne Borough Council has prepared its 'preferred options' on two Development Plan Documents (DPDs) covering the Borough of Spelthorne. These are -

1. Spelthorne Development Plan - Strategy and Policies (Preferred Options) – This sets out the 'core strategy' of the new plan with vision and objectives for the Borough and includes all development control policies.
2. Spelthorne Development Plan - Proposals (Preferred Options) – This sets out all site specific proposals (including proposed housing sites).

The consultation period starts from 4 May 2006 and representations must be received by 5.00 pm on 15 June 2006. Representations can be sent in writing to: Planning Services, Council Offices, Knowle Green, Staines TW18 1XB. Alternatively they can be submitted electronically via the Council's website www.spelthorne.gov.uk

If you would like to be notified when the DPDs are submitted to the Secretary of State for independent examination please let us know specifying a contact address along with your representation.

In addition to the documents there are other supporting documents including an accompanying Sustainability Appraisal report. The Sustainability Appraisal report was prepared in parallel with the two DPDs, it contains an assessment of them against a set of social, environmental and economic objectives.

The two DPDs along with the supporting documents are available for inspection at the Council Offices and all public libraries in the Borough at the opening times specified below.

	Mondays to Thursdays				Fridays	
Council Offices, Knowle Green, Staines TW18 1XB	8.45am – 5pm				8.45am - 4.45pm	
	Mon	Tue	Wed	Thu	Fri	Sat
Ashford Library, Church Road, Ashford, TW15 2XB	Closed	9.30am – 8pm	9.30am – 5pm	9.30am – 5pm	9.30am – 8pm	9.30am – 4pm
Shepperton Library, High Street Shepperton, TW18 9AU	10am – 5pm	10am – 5pm	Closed	2 – 5pm	10am – 5pm	9.30am – 4pm
Staines Library, Friends Walk, Staines, TW18 4PG	9.30am – 5pm	9.30am – 8pm	9.30am – 5pm	9.30am – 8pm	9.30am – 5pm	9.30am – 4pm
Stanwell Community Library & Information Centre, The Stanwell Centre, Hadrian Way, Stanwell, TW19 7HE	9.30am – 1pm	9.30am – 1pm and 2 – 5pm	9.30am – 1pm	9.30am – 1pm	9.30am – 1pm and 2 – 5pm	9.30am – 1pm
Sunbury Library, The Parade, Staines Road West, Sunbury-on-Thames, TW16 7AB	9.30am – 5pm	1 – 8pm	Closed	9.30am – 5pm	9.30am – 5pm	9.30am – 4pm

Further information on the consultation and all associated documents are available free to view/download on the Council's website www.spelthorne.gov.uk

Proposal Matters

Proposals Matters (Explains Consultation arrangements)



Consultation on
Spelthorne Development Plan - Strategy and Policies (Preferred Options) and Proposals
(Preferred Options)

Regulation 26 of Planning and Compulsory Purchase Act 2004, The Town and Country Planning (Local Development) (England) Regulations 2004 requires Local Authorities to publish 'Proposals matters' in relation to any development plan document (DPD).

Proposed title of Development Plan Documents (DPDs)

There are two DPDs that are being consulted on. Their titles are as below -

1. Spelthorne Development Plan - Strategy and Policies (Preferred Options)
2. Spelthorne Development Plan - Proposals (Preferred Options)

Area covered by the proposed DPDs

The Borough of Spelthorne

Subject Matter of the proposed DPDs

1. Spelthorne Development Plan - Strategy and Policies (Preferred Options) –sets out the 'core strategy' of the new plan with vision and objectives for the Borough and includes all development control policies.
2. Spelthorne Development Plan - Proposals (Preferred Options) - sets out all site specific proposals (including proposed housing sites)

The period within which representations may be made

The consultation period starts from 4 May 2006 and representations must be received by 5.00 pm on 15 June 2006.

The address to which representations must be sent

Representations can be sent in writing to
Planning Services
Council Offices
Knowle Green
Staines TW18 1XB

OR

submitted electronically via the Council's website www.spelthorne.gov.uk

Statement of Notification

If you would like to be notified when the DPDs are submitted to the Secretary of State for independent examination please let us know specifying an address along with your representation.

Sustainability Appraisal Report

In addition to the documents there are other supporting documents including an accompanying Sustainability Appraisal report. The Sustainability Appraisal report was prepared in parallel with the two DPDs, it contains an assessment of them against a set of social, environmental and economic objectives.

Availability of Documents

The two DPDs along with the Sustainability Appraisal report are available for public inspection on the Council's website www.spelthorne.gov.uk and at the following locations:

	Mondays to Thursdays			Fridays		
Council Offices, Knowle Green, Staines TW18 1XB	8.45am – 5pm			8.45am - 4.45pm		

	Mon	Tue	Wed	Thu	Fri	Sat
Ashford Library, Church Road, Ashford, TW15 2XB	Closed	9.30am – 8pm	9.30am – 5pm	9.30am – 5pm	9.30am – 8pm	9.30am – 4pm
Shepperton Library, High Street Shepperton, TW18 9AU	10am – 5pm	10am – 5pm	Closed	2 – 5pm	10am – 5pm	9.30am – 4pm
Staines Library, Friends Walk, Staines, TW18 4PG	9.30am – 5pm	9.30am – 8pm	9.30am – 5pm	9.30am – 8pm	9.30am – 5pm	9.30am – 4pm
Stanwell Community Library & Information Centre, The Stanwell Centre, Hadrian Way, Stanwell, TW19 7HE	9.30am – 1pm	9.30am – 1pm and 2 – 5pm	9.30am – 1pm	9.30am – 1pm	9.30am – 1pm and 2 – 5pm	9.30am – 1pm
Sunbury Library, The Parade, Staines Road West, Sunbury-on-Thames, TW16 7AB	9.30am – 5pm	1 – 8pm	Closed	9.30am – 5pm	9.30am – 5pm	9.30am – 4pm

Further information is available on the Council's website www.spelthorne.gov.uk or by telephoning 01784 446343.

Appendix H (iv)
COPY OF REPRESENTATION FORM

Spelthorne Development Plan Form for Making Representations May - June 2006



This form must be used when making representations on any of the following documents which the Council is consulting on from 4 May to 15 June 2006. Please return completed forms to Preeti Gulati, Planning Services, Council Offices, Knowle Green, Staines TW18 1XB **no later than 5pm 15 June 2006.**

Please use a separate form for each representation that you wish to make.

This form may also be submitted electronically through our website
www.spelthorne.gov.uk

Please tick box to indicate which document you are commenting on:

- | | |
|---|--------------------------|
| Strategy and Policies – Preferred Options | <input type="checkbox"/> |
| Proposals – Preferred Options | <input type="checkbox"/> |
| Final Sustainability Appraisal Report | <input type="checkbox"/> |
| Elmsleigh Centre Brief, Initial Draft | <input type="checkbox"/> |
| Bridge Street Car Park Brief, Initial Draft | <input type="checkbox"/> |

1. Your Contact Details		2. Agents Details (if applicable)
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone No.		
E-mail Address		

3. Please tick here if you would like all future correspondence about the New Development Plan to be sent to you by e-mail

4. To which part of the document does your representation relate?

Paragraph Number	<input type="checkbox"/>	<i>(All documents)</i>	Policy Number	<input type="checkbox"/>	<i>(Core Strategy and Policies DPD – Preferred Options Document only)</i>
Proposal Number	<input type="checkbox"/>	<i>(Proposals DPD – Preferred Options Document Only)</i>	Table Number	<input type="checkbox"/>	<i>(All documents)</i>

5. Do you wish to OBJECT to or SUPPORT the above paragraph / policy / proposal / table? (Please tick one only, it is essential that this question is completed)

Object Support

6. Please give brief details of why you OBJECT to or SUPPORT the above paragraph / policy / proposal / table?

7. Please give details of the change(s) you consider necessary to improve the Document having regard to your response to question 6 above. (Please be as precise as possible)

8. We are also inviting initial ideas on the content of Supplementary Planning Documents which give guidance to further explain our detailed policies, including affordable housing. Please give any suggestions you may have in the box below.

Signature Date

