

Spelthorne Borough Council
**Appendix A - Responses & Comments to Duty
to Cooperate Scoping Statement**

Document Section or Question	Name	Comment	Response	Amendment Required?
Whole Statement				
Whole	GLA	<p>Thank you for inviting the Mayor of London to respond to the Spelthorne Local Plan Duty to Co-operate Scoping Statement.</p> <p>We welcome the inclusion of the Mayor and Transport for London as relevant 'Duty to Co-operate' bodies. Please can you add Transport for London to the identified bodies in Table 4-1 on page 19?</p> <p>I would like to draw your attention to our officer-level Strategic Spatial Planning Liaison Group, in which representatives from across the wider South East and London are meeting quarterly to discuss DTC issues. This group considers a range of high-level strategic issues to complement the DTC obligations of individual authorities. Further information on this group and cross-boundary strategic planning co-operation can be found at: https://www.london.gov.uk/priorities/planning/london-plan/cross-boundary-strategic-planning-co-operation</p> <p>The Mayor is also working with South East England Councils / South East Strategic Leaders, the East of England Local Government Association and other agencies to explore further arrangements to</p>	<p>Noted.</p> <p>The Borough Council is aware of the Strategic Spatial Planning Liaison Group (SSPOLG) and all Surrey Districts/Boroughs are represented by Officer's from Surrey County Council and Mole Valley DC. Reference to this group can be made in the DtC Statement.</p> <p>Noted. Spelthorne attended the Wider South East Summit held at the GLA in March 2015 which considered further arrangements for coordinating policy</p>	<p>TfL to be added to the identified bodies in Table 4-1.</p> <p>Add reference to SSPOLG in the DtC Statement.</p>

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		more effectively coordinate strategic policy and investment across the wider South East of England.	and infrastructure across the wider south east.	
Whole	The Royal Borough Of Windsor And Maidenhead	<p>RBWM welcomes the consultation and the opportunity this offers to agree on the scope of future engagement between our authorities. RBWM agrees that it is necessary to undertake a scoping exercise and considers that the general structure and extent of the document is appropriate.</p> <p>You may wish to note that RBWM is undertaking its own Duty to Cooperate Scoping Exercise and we will shortly consult you and other stakeholders on this. In doing this we have sought to reflect the issues and linkages identified in your own scoping statement. If you consider that there is anything that has been missed or should be presented differently in our work, please feel free to respond accordingly.</p> <p>RBWM looks forward to ongoing and effective engagement with Spelthorne Borough Council and other partners under the Duty to Cooperate.</p>	Noted.	
Whole	Elmbridge Borough Council	The issues you have identified as requiring consultation between our authorities are correct, and that they may potentially	Noted.	

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		require further joint working depending on the outcomes of any studies.		
Whole	Slough Borough Council	<p>We took a report to our Planning Committee last night about your Scoping Statement.</p> <p>The Section on Spelthorne stated:</p> <p>Spelthorne</p> <p>5.16 As the first stage in the review of its Local Plan Spelthorne Borough Council has prepared a Duty to Cooperate Scoping Statement to help ensure that it has identified all relevant cross boundary issues, the authorities/bodies that it will need to engage with and the mechanisms for that engagement.</p> <p>5.17 Spelthorne has joined with Runnymede to prepare a Strategic Housing Market Assessment which this Council has already been involved in. The key issues identified for the Local Plan are how additional housing requirements within Spelthorne can be met and whether Spelthorne requires assistance from or can give assistance to other authorities in meeting needs across the local or sub housing market area?</p> <p>5.18 It is considered that the starting point</p>		

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		<p>for the Local Plan is that it should seek to meet its housing needs within its boundaries but it is recognised that a range of options need to be tested.</p> <p>5.19 One of the other key issues that has been identified is what the balance between housing and jobs should be in the Borough and how this could be affected by the expansion of Heathrow.</p> <p>5.20 It is considered that it is vitally important that the Spelthorne Local Plan takes full account of the possible expansion of Heathrow.</p> <p>5.21 The Scoping statement for the Local Plan has identified a number of other topics including retail, leisure, transport, open space & recreation, climate change, Green Belt and biodiversity. Slough Borough Council has been identified as an authority to be engaged in discussion about all of these topics.</p> <p>It was resolved that:</p>	<p>Noted. Agreed that the starting point will be for Spelthorne & Runnymede to meet objectively assessed needs within their HMA as far as is possible in the first instance. However, if this is not possible when balancing need/supply and constraints then assistance may be required from areas outside of Runnymede/Spelthorne.</p> <p>Point regarding Heathrow is noted. This will need to be addressed once a decision regarding airport expansion in the South East has been made.</p>	

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		b) That Spelthorne Borough Council be thanked for Consulting the Council about its Duty to Cooperate Scoping Statement and the comments set out in paragraphs 5.18 and 5.20 of this report be forwarded on to them.	Noted.	
Whole	NHS NW Surrey Clinical Commissioning Group	<p>Thank you for inviting NHS North West Surrey CCG, as a prescribed body, to comment on the Duty to Cooperate Scoping Statement.</p> <p>I recognise that the document necessarily has a broad remit and therefore covers multiple areas such as employment, retail, leisure, transport, utilities and flooding. Whilst noting these areas, you will appreciate that I have restricted my comments principally to those areas most directly relating the provision of health services for the population of Spelthorne. I have also set out how the CCG wishes to engage with Spelthorne Borough Council in these matters.</p>	Noted.	
Whole	Enterprise M3 Local Enterprise Partnership	We have reviewed the documentation and engaging Enterprise M3 is entirely appropriate as you develop your Local Plan and we welcome the recognition of Enterprise M3 in the document. Enterprise	Noted.	

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		<p>M3's Strategic Economic Plan recognises Staines-upon-Thames as a Step-up Town and therefore we believe it is vital that we work with you on your homes and jobs; retail and leisure and infrastructure themes.</p> <p>Having reviewed the document, there are a few specific points that Enterprise M3 would like to address which I hope will be useful to you as you develop your Local Plan.</p>		
Whole	Surrey County Council	<p>Thank you for consulting Surrey County Council on the Spelthorne Borough Council Duty to Cooperate Statement and draft SCI Consultations.</p> <p>We welcome the involvement of the County Council as a consultee in strategic matters as proposed in the Duty to Cooperate Statement. We have just two minor observations to make relating to education and aviation.</p>	Noted.	
Whole	South Bucks District Council	<p>Thank you for the opportunity to comment on Spelthorne Borough Council's Duty to Co-operate Scoping Statement. The following comments have been endorsed by South Bucks District Council's Portfolio Holder for Sustainable Development.</p>	Noted.	

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		<p>South Bucks District Council welcomes the preparation of the Scoping Statement. We note that the Scoping Statement lists all those matters which are considered to be strategic in the Spelthorne context and identifies which other authorities and bodies may be affected having regard to the National Planning Policy Framework and the advice in the National Planning Policy Guidance on matters including the likely geographic extent or area of influence.</p> <p>The Scoping Statement identifies two issues on which it proposes to engage with South Bucks District Council: (i) general housing and (ii) traveller accommodation.</p>		
Whole	Environment Agency	<p>Thank you for consulting us on the above document. We look forward to working with you on your review of your Local Plan.</p> <p>Your DtC Scoping Statement is very comprehensive and we only have a few points to raise.</p>	Noted.	
Whole	Surrey Heath Borough Council	<p>Thank you for consulting Surrey Heath Borough Council on the Spelthorne Local Plan Duty to Cooperate Scoping Statement. Surrey Heath Borough Council has now had the opportunity to review the document and</p>	Noted.	

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		<p>considers that all relevant cross boundary strategic matters have been appropriately addressed and that the proposed stakeholders and mechanisms for engagement for each topic area have been identified in a suitably pragmatic manner.</p> <p>We note that Spelthorne will be undertaking work to define its Functional Economic Area over the course of the coming year. In doing so, Spelthorne should be aware that the FEA's for some areas have already been defined and established through consultation.</p> <p>I hope this information is of assistance to you. Surrey Heath would welcome the opportunity to comment on future work prepared as part of the Spelthorne Local Plan.</p>	<p>Spelthorne will review the extent of other FEAs as part of the work on determining which FEA that Spelthorne forms part of. Surrey Heath will continue to be engaged in this process.</p>	
Whole	Hart District Council	<p>Many thanks for consulting Hart DC on the above document, with which fundamentally we have no problems. A couple of issues merit further comment:</p> <p>HOUSING GROWTH Hart agrees with your identification that our two HMAs (Spelthorne-Runnymede and Hart-Rushmoor-Surrey Heath) will need to keep communicating with each other given that there is a common boundary. It is my</p>	<p>Noted. However, should evidence show that Spelthorne/Runnymede are not in a position to meet needs in their HMA, this does not preclude further discussion with HMAs outside of</p>	

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		<p>understanding from past correspondence that each HMAs will be seeking to accommodate objectively assessed housing need within respective Areas.</p> <p>TRAVELLERS I am less sure about Hart being identified for potential joint work under this theme. Records suggest that we tend to have strongest relationships on this theme northwards towards neighbours in Berkshire and westwards towards Basingstoke. Post-2010 strategic planning does not appear to demonstrate a common relationship over travellers' needs with Spelthorne - unless of course the evidence base reveals otherwise.</p> <p>We look forward to further clarity in this respect.</p>	<p>Spelthorne/Runnymede.</p> <p>Noted. It is agreed that links between Spelthorne and Hart in terms of Traveller accommodation are unlikely, although this will be subject to the findings of a TAA which Spelthorne has yet to commence. Spelthorne will continue to engage with the authorities/bodies identified in the Duty to Cooperate Scoping Statement once it has commenced its TAA.</p>	
Whole	Waverley Borough Council	Thank you for consulting Waverley on the above documents. We have no comments to make.	Noted.	
Whole	Transport For London	Thank you for consulting TfL. In response to the consultation request letter, dated 27th February 2015, TfL have the following initial comments.		

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		<p>TfL is unclear as to the appropriateness of setting out the limited selection of general and more specific 'key issues' set out at paragraph 4.50. The list appears to be overly focussed on highway capacity, with less regard to the full range of public transport modes.</p> <p>It is noted at Table A2 that Transport for London is not identified as an appropriate party in regard to the assessment of Transport (Walking / Cycling) Infrastructure. This should be corrected to have reflect TfL's function in this area.</p>	<p>Paragraph 4.50 places emphasis on highway capacity as this will be one of the fundamental issues for the Local Plan to deal with in terms of both the local and strategic network. Paragraph 4.50 does also considers links to cycle networks and improved rail access to Heathrow as other key issues although it is agreed that public transport should be considered as a key issue and will be added to the list.</p> <p>Noted.</p>	<p>Public transport to be added to the list of key issues.</p> <p>TfL to be added to Table A2 for Walking/Cycling.</p>
Whole	Tandridge District Council	<p>Thank you for inviting Tandridge District Council to comment on the Duty to Cooperate Scoping Statement.</p> <p>We have no specific comments to make on the scoping statement but would like to take this opportunity to ensure that we continue to work on strategic issues with Spelthorne in regard to the duty.</p>	Noted.	

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Whole	Rushmoor Borough Council	<p>Thank you for consulting Rushmoor Borough Council on the Duty to Cooperate Scoping Statement.</p> <p>In terms of general observations, we are supportive of the approach Spelthorne has taken in terms of the scope of the consultation document. In particular, we welcome the setting out of approaches to engage with each of the relevant authorities/bodies on each of the strategic matters identified.</p>	Noted.	
Whole	Office Of Rail Regulation	<p>Thanks for your e-mail of 26.02.15 in regard to the Spelthorne Borough Council Duty to Co-operate scoping statement & Draft Statement of Community Involvement. We have reviewed your proposals & note that your proposals do not affect the current or (future) operation of the mainline network in Great Britain.</p> <p>It might be helpful if I explain that the office has a number of key functions and duties in our role as the independent regulator of Britain's Railways. If your plans relate to the development of the current railway network including the operation of passenger and freight services, stations, stabling and freight sites (including the granting of track and station access rights and safety</p>	Noted.	

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		approvals) within your administrative area, we would be happy to discuss these with you once they become more developed so we can explain any regulatory and statutory issues that may arise. I have attached a copy of our localism guidance for reference,		
Whole	Woking Borough Council	Thank you for consulting Woking Borough Council on the Duty to Cooperate Scoping Statement. I have nothing further to add to the issues that have been identified. They are sufficiently comprehensive. However, I am yet to gain a full understanding of why you felt that matters such as housing provision are relevant strategic issues between Spelthorne and Woking as we are in different Housing Market Areas. Obviously the discussions will clarify that and we look forward to engage with you to define in detail the relevant strategic matters between the two authorities and how we can work together to address that.	<p>The draft Spelthorne & Runnymede SHMA identifies potential overlaps with other housing market areas. The SHMA highlights that although Spelthorne/Runnymede can be viewed as a single local HMA, overlaps do exist specifically with Elmbridge, Hounslow and Woking and that the authorities should work together to explore this. As such we welcome Woking's intent to discuss and engage with Spelthorne/Runnymede on this strategic issue.</p> <p>The draft Stage 2 SHMA will be circulated to all DtC partners and as such Woking will have the opportunity to comment on this document and hold further detailed discussions with Spelthorne/Runnymede as appropriate.</p>	No change.

Section 3

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Section 3	Enterprise M3 Local Enterprise Partnership	In Section 3 (Existing Mechanisms of Engagement and Identification of New Mechanisms), it would be helpful if this list acknowledged the relevant structures within Enterprise M3 and the role that they could play, in particular the Enterprise M3 Joint Leaders Board and the Enterprise M3 Action Groups (notably Transport and Land and Property).	Noted.	Scoping Statement to be updated to refer to EM3 LEP structures and the role they could play.
Section 3	Environment Agency	We support the existing mechanisms outlined in section 3.16 to 3.18 regarding flooding, flood risk and the River Thames Scheme (RTS). The RTS is a partnership project and these mechanisms for working together are important to ensure that all parties are involved and communicating the same messages. The Lower Thames Planning Officers Group provides a platform for discussion and sharing of best practice across a wider planning remit.	Noted.	
Section 4				
Section 4	Reigate And Banstead Borough Council	- We have no evidence to suggest that both Reigate and Banstead BC, and Spelthorne BC are in the same housing market, and therefore we do not consider that there are any cross boundary issues to engage on regarding General Housing. However,	Noted. It would appear that Reigate & Banstead and Spelthorne are not within the same or within neighbouring HMAs. However, as stated authorities across Surrey have a duty to engage with the GLA on this issue which may	No change.

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		<p>RBBC recognises that authorities across Surrey as a whole have a duty to engage with the Greater London Authority on this issue.</p> <p>- We have identified potential cross-boundary issues relating to Gypsy and Traveller Accommodation with yourselves and other Surrey Authorities, and therefore we agree with your identification of engagement with our Borough on this issue.</p> <p>- We are in agreement that there are no other strategic matters to engage on with Spelthorne Borough Council.</p>	<p>require a joint approach from all Surrey authorities.</p> <p>Whilst it is highly unlikely that there will be a functional link between Spelthorne and Reigate & Banstead in terms of Gypsies & Travellers, Spelthorne has not yet commenced its TAA work. Until such time as survey work discounts a functional link, Spelthorne will continue to engage on this issue.</p> <p>Noted.</p>	
Section 4	Enterprise M3 Local Enterprise Partnership	In Section 4 (Transport) it would be helpful for Enterprise M3 to be included on the list of people to be engaged on the highway capacity issues mentioned in paragraph 4.49.	Noted.	EM3 LEP to be added to the list in paragraph 4.49.
Section 4	Enterprise M3 Local Enterprise Partnership	At section 4.53, you propose that Enterprise M3 could play a role in facilitating engagement with the utility providers. This isn't something that Enterprise M3 in the	Noted. Spelthorne to discuss infrastructure with EM3 LEP at the appropriate time although this may partly be through the Surrey Planning	

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		past but would be happy to discuss this opportunity with you in further detail at the appropriate time.	& Infrastructure Framework (SPIF).	
Section 4	Surrey County Council	<p>Education</p> <p>Paragraph 4.76 states that "Education services in Spelthorne are provided by Surrey County Council." The county council's role is however rather more complex in terms of its service delivery role and we are not the sole provider of education. Something along the lines of the following extract from the Schools Organisation Plan might be helpfully incorporated into the education section:</p> <p>Surrey County Council has a statutory duty to ensure there are sufficient school places in the county to meet the present and future demand for school places. It is the role of the County Council to plan, organise and commission places for all maintained schools in Surrey in a way that raises standards, manages rising and declining pupil numbers and creates a diverse school community. The County Council seeks to exercise this function in partnership with Dioceses, governing bodies of schools, head teachers, local communities and other key stakeholders.</p>	Noted.	Scoping Statement to be amended to reflect the Schools Organisation Plan.

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		<p>Aviation</p> <p>We note that in Table A3, Heathrow Airport is included as a consultee for cross boundary strategic matters. We would suggest that the County Council could also usefully be involved in joint liaison with the airport, particularly as the implications of airport expansion is likely to directly impact on transport and other county council provided strategic infrastructure and it is important that we work together to resolve potential impacts.</p>	<p>Noted. Spelthorne welcomes Surrey County Council's commitment to be involved in joint discussions with Heathrow Airport in the event of expansion.</p>	<p>SCC to be identified for Aviation in Table A2.</p>
Section 4	South Bucks District Council	<p>General Housing:</p> <p>The Scoping Statement explains that the local authorities identified for co-operation on general housing (listed in Table 4-1) have been selected based on housing market area geography. Specifically, they share a common administrative boundary with Spelthorne/Runnymede (who are undertaking a joint SHMA) and/or are authorities that are within neighbouring housing market areas.</p> <p>As you are aware, in 2014 the Buckinghamshire district councils commissioned ORS and Atkins to identify</p>	<p>Spelthorne are aware of the SHMA work that ORS has been undertaking on behalf of the Buckinghamshire</p>	

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		<p>the housing market areas (and functional economic areas) that the four authorities fall within, both at a strategic and more local level. ORS/Atkins were also asked to identify other authorities that fall within those areas. The study is currently being finalised, but is likely to conclude that South Bucks forms part of a Berkshire SHMA/FEMA. South Bucks DC understands that the Berkshire authorities have appointed consultants (GL Hearn) to undertake a SHMA. An early stage of that work involves determining the SHMA geography for Berkshire. Although not a commissioning authority, South Bucks is currently awaiting the recommendations of GL Hearn to see whether their conclusions are aligned with those of the ORS work on Buckinghamshire. If the Berkshire commission concludes that South Bucks does form part of the Berkshire SHMA, South Bucks will be seeking to arrange a discussion on how the SHMA will be taken forward and what role, if any, the Berkshire authorities see for South Bucks as part of the remaining stages of G L Hearn's work. It is also understood that the G L Hearn work will be testing whether there should be one or two SHMAs based on Berkshire; if two is the conclusion South Bucks may not be in an adjoining SHMA with Spelthorne.</p>	<p>authorities and the provisional conclusions from that study. Spelthorne is also aware that the Berkshire authorities have commissioned GL Hearn to undertake a Berkshire wide SHMA and Spelthorne/Runnymede will be attending the SHMA event on 19th May and will continue to engage in the process.</p> <p>From the early work undertaken by ORS on behalf of the Buckinghamshire authorities it is Spelthorne's understanding that part of South Bucks is likely to fall within an HMA with other Berkshire authorities which could include the Borough of Slough which neighbours Spelthorne. It is noted that the study is still being finalised but that South Bucks is likely to form part of a Berks HMA. However, Spelthorne also notes that the GL Hearn study for Berkshire may not find South Bucks in a neighbouring HMA to Spelthorne/Runnymede but other areas of Berkshire.</p>	

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		<p>Given this emerging context, the identification of South Bucks within Table 4-1 should be considered provisional and subject to review once the outcome of the SHMA geography for Berkshire is confirmed.</p> <p>Traveller Accommodation:</p> <p>The Scoping Statement explains that the local authorities identified for co-operation for traveller accommodation (listed in Table 4-2) are the same as those identified to be engaged on housing matters. In other words, the list compiled for Table 4-1 is simply replicated in Table 4-2, and the reason why South Bucks has been included in Table 4-2 is because it may form part of a Berkshire SHMA. Whilst this may be 'pragmatic', the housing market geography which is emerging based on robust, tailored methodologies and using specific, up-to-date technical evidence, does not in our opinion provide an appropriate basis for the selection of authorities for engagement for traveller accommodation. The list of authorities in Table 4-2 should be based on evidence that relates specifically to travellers rather than assuming the same geographic extent of coverage as for general housing. South Bucks DC is not</p>	<p>As such, until such time as HMA boundaries are confirmed between Berks/South Bucks, South Bucks will remain as an identified DtC partner in Table 4-1, although it is agreed that this should be reviewed if South Bucks does not fall within a neighbouring HMA to Spelthorne/Runnymede.</p> <p>Whilst it is agreed that DtC partners should be identified based on evidence relating to Travellers, the approach to using the same authorities as for general housing is a pragmatic way forward until such time as evidence has been collated. This ensures that Spelthorne engages with as wide an area as possible at the early stages of plan preparation even though subsequently links may not be seen between the two boroughs (which is a likely outcome). In any event this position can be reviewed once TAA and survey evidence is in place.</p>	<p>No change.</p> <p>No change.</p>

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		<p>aware of any evidence that would suggest a firm and justifiable basis for its inclusion in Table 4-2.</p> <p>Other Matters</p> <p>Although we agree that South Bucks should not be included in other tables in your document, given that both of our authorities (and those around us) are at early plan-making stages we suggest that the tables are kept under review as evidence base work emerges in case the circumstances change. Although unlikely, there could be changes. For example South Bucks is currently scoping a potential water cycle study with the Environment Agency which may have to cover a significant area as yet undefined.</p>	<p>Noted. Tables will be reviewed as evidence is updated. Spelthorne would wish to be kept informed of the potential for a water cycle study as will other authorities within the lower Thames area.</p>	
Section 4	English Heritage	<p>As you are aware the Historic Buildings and Monuments Commission (English Heritage) is a "prescribed body" by virtue of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and is therefore required to co-operate in relation to planning of sustainable development with local planning authorities and other prescribed bodies by Section 33A of Part 2 of the Planning and Compulsory</p>	<p>Noted.</p>	

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		<p>Act (as inserted by Section 110 of the Localism Act 2011).</p> <p>The activities on which the prescribed bodies are required to co-operate include the preparation of a development plan and other local development documents so far as they relate to a strategic matter; i.e. sustainable development or use of land that has or would have a significant impact on at least two planning areas.</p> <p>English Heritage confines its involvement in planning issues to matters that involve or otherwise affect the historic environment. English Heritage's duty to co-operate is therefore appropriate in respect of strategic matters that would involve or otherwise affect a heritage asset.</p> <p>According to our records, there is just one heritage asset, Chertsey Bridge scheduled monument, that straddles the Borough boundary and therefore might potentially be a strategic matter. There are also a number of listed buildings located in close proximity to the Borough boundary which could potentially be affected by strategic matters, but you have identified these as not requiring strategic cooperation.</p> <p>I also note that cross-boundary housing</p>		

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		sites are identified as a major issue. If any of these would involve or otherwise affect a heritage asset, then again English Heritage should be involved.		
Section 4	Guildford Borough Council	<p>Thank you for consulting us on your Duty to Cooperate scoping statement. We agree with your assessment that the only two shared cross boundary strategic issues pertain to meeting wider housing and traveller need.</p> <p>Housing: whilst Guildford do not form part of the Spelthorne's housing market area, housing need and provision is a sub-regional issue. Through our respective local plans it will be important that we all maximise opportunities to sustainably meet identified needs in order to minimise pressure on remaining areas.</p> <p>Travellers: we share a common Surrey-wide methodology which our Traveller Accommodation Assessment (2012) has been prepared in accordance with. Whilst meeting traveller need is a strategic issue we envisage meeting our own traveller need within our borough.</p> <p>We look forward to continuing to work with Spelthorne where relevant as we progress</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	

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		our local plans.		
Section 4	Environment Agency	<p>Section 4 of your Scoping Statement identifies the proposed engagement for strategic cross boundary issues. We have the following comments on specific sections.</p> <p>Utilities Infrastructure</p> <p>With regard to the section on Utilities Infrastructure we are happy with the key issues in paragraph 4.55 and are pleased we are included as an identified body in Table 4-7: Proposed Engagement for Utilities Infrastructure. The issues we would want to be addressed under this heading are foul drainage infrastructure and water supply.</p> <p>Flooding and Flood Risk</p> <p>We support the section on flooding and flood risk in particular the need to update the Strategic Flood Risk Assessment as part of the evidence base for the Local Plan. We also support the opportunity outlined in paragraph 4.64 to explore the possibilities to align local plan policies or text approaches regarding the RTS.</p>	<p>Noted.</p> <p>Noted.</p>	

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		<p>Climate Change</p> <p>The section in your statement on Climate Change, page 38, appears to be only looking at carbon emissions, transport and energy. Climate Change adaptation covers a wide range of issues many of which are mentioned elsewhere within the scoping statement such as flood risk, biodiversity and water supply. We are not suggesting that work is duplicated if it is being progressed through other mechanisms but are concerned that climate change is considered too narrowly. Perhaps through the Duty to Cooperate there is an opportunity to look at the issues associated with climate change in a more overarching way.</p> <p>Biodiversity</p> <p>With regard to biodiversity our remit involves the biodiversity relating to the main rivers within your borough. Depending on the direction that this strategic work takes as you progress we may wish to be involved or we may rely on our engagement with the Surrey Local Nature Partnership.</p>	<p>Noted.</p> <p>Noted.</p>	<p>Wider consideration to be given to climate change issues including adaptation if not already set out elsewhere in the Scoping Statement.</p>

Q1 Has the Council identified all relevant cross boundary strategic matters and those which could have a significant impact on at least two planning

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Document Section or Question areas?	Name	Comment	Response	Amendment Required?
Q1	The Royal Borough Of Windsor And Maidenhead	All matters identified by RBWM are addressed in the document.	Noted.	
Q1	NHS NW Surrey Clinical Commissioning Group	The Scoping Statement appears to have identified relevant strategic matters. I was pleased to note that (Paragraph 4.6) the Borough Council will continue to respond to and engage with other authorities and bodies where they request this, including those which might cover a wider geographic area, and respond positively where joint working between Spelthorne and other authorities would facilitate agreement or joint approaches. An example of this joint working would be the development of the CCG's planned Locality Hubs, providing integrated services for frail older people - an initiative involving Surrey County Council and the four Borough Councils spanned by the CCG, as well as local health providers and the voluntary sector.	Noted.	
Q1	Runnymede Borough Council	RBC does not wish to add to the specified list of relevant cross boundary strategic matters and those that could have a significant impact on at least two planning	Noted.	

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Document Section or Question	Name	Comment	Response	Amendment Required?
		areas.		
Q1	Natural England	<p>The document should to address that part of the Borough lies in the 5-7km avoidance and mitigation zone for the Thames Basin Heaths Special Protection Area (TBHSPA) and that a strategic cross boundary approach / solution and strategic policy NRM6 is in place for large developments over 50 units in this zone - n.b. the closest point of the Borough is 6.3km from Chobham Common Sites of Special Scientific Interest (SSSIs) which is also part of the TBHSPA and Thursley, Ash, Pirbright, and Chobham Special Area of Conservation (SAC).</p> <p>The document should address the fact that any activity with potential harm to SSSIs, or likely significant effect if a Natura 2000 site, will be assessed even if the designated site lies outside of Spelthorne BC's administrative boundary.</p> <p>The same point as above applies to Local Wildlife Sites, although this tier of site falls below NE's statutory remit for comment.</p>	<p>Only a small part of Spelthorne lies within the 5-7km zone of influence for the TBH SPA and the whole of the Borough lies outside of the 5km zone where avoidance in the form of SANG and SAMM is required as a matter of course. The number of development opportunities for 50 or more dwellings within the area of Spelthorne in the 5-7km zone is also likely to be limited. However, reference will be made to the TBH SPA, Policy NRM6 and the TBH Joint Strategic Planning Board in this respect. It should be noted that Spelthorne is not an authority which sits on or has been invited onto the JSPB.</p> <p>Reference to activity affecting Natura 2000 sites or SSSIs sites outside of Spelthorne to be added although this would (for Natura 2000) normally be undertaken as part of a Habitats Regulations Assessment (HRA)</p> <p>Noted.</p>	<p>Add reference to TBHSPA Policy NRM6 and JSPB.</p> <p>Reference to activity affecting Natura 2000 sites or SSSIs to be added.</p> <p>Reference to Local Wildlife Sites to be added.</p>

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		Ancient Woodland as defined as irreplaceable by the NPPF should be considered in the biodiversity section and should be added in for consideration, as should Best and Most Versatile (BMV) soils as a finite resource and cross boundary issue.	Noted.	Reference to Ancient Woodland and BMV soils to be added.
Q1	London Borough Of Richmond Upon Thames	<p>Yes, we believe that Spelthorne has identified all relevant cross-boundary strategic matters and those which could have a significant impact on at least two planning areas.</p> <p>LBRuT looks forward to working with Spelthorne on the following strategic matters, as identified in the scoping statement: Housing; Traveller Accommodation; Employment; Retail; Leisure and other commercial; Transport infrastructure (road + walking / cycling); Flooding and flood risk; Health; Open space and recreation; Climate change; Green belt / Landscape; and Biodiversity.</p>	Noted.	
Q1	Transport For London	In regard to strategic matters, in relation to transport, yes, although comment is offered below in terms of what 'key issues' are noted to arise from these matters.	Noted.	

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Q1	Rushmoor Borough Council	In terms of the strategic matters that are shared across Rushmoor and Spelthorne, we would support the view that this extends only to Housing related matters (including Gypsy & Traveller accommodation) given the fact that both authorities are located within neighbouring Housing Market Areas. In respect of other strategic matters, given the extent of the distance between our respective authorities, we do not feel we can comment with certainty on whether all of these have been addressed.	Noted.	
Q2 Has the Council identified all relevant authorities, prescribed bodies and other consultees that it needs to engage and work with to maximise the effectiveness of planning policies in regards to each strategic matter?				
Q2	The Royal Borough Of Windsor And Maidenhead	Given the evolving and iterative nature of engagement, RBWM considers that a pragmatic list of stakeholders has been identified. RBWM considers that the list of stakeholders should be kept under review and revised if necessary as engagement on particular issues develops.	Noted.	The list of stakeholders will be kept under review during plan preparation and will be set out within the Framework Statement.
Q2	NHS NW Surrey Clinical Commissioning Group	Looking first at matters relating directly to health services, paragraph 1.18 refers to the list of prescribed bodies to which the duty applies, among which, for Health, are: - Clinical Commissioning Groups; - National Health Service Commissioning		Reference to NHS Property

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		<p>Board (now NHS England);</p> <p>Although these are the statutory requirements, I would strongly recommend that for your local plan, you include reference to NHS Property Services, or any equivalent successor body, in ensuring meaningful engagement over health infrastructure, particularly in relation to Primary Care services. This should be added to Section 2 (Identified Bodies) in Table 4.9.</p> <p>In the same section (Para 4.65), I suggest acknowledging that the majority of the population's health service contacts take place in Primary Care - which is not currently mentioned in Para 4.65. (Primary Care includes GP services and dentists.) You may also consider adding Community Health Services - currently provided by Virgin Care Services Limited.</p> <p>Para 4.67: I suggest amending to read "The commissioning of the majority of health services..." as currently NHS England and, to a small extent, Surrey County Council (public health team) also commission some health services.</p> <p>My key concern is to make clear the link between housing growth and capacity of</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Spelthorne (either individually or with other authorities) will engage</p>	<p>Services to be added to Table 4.9.</p> <p>Reference to Primary Care to be added along with Community Health Services.</p> <p>Reference to NHS England and Surrey County Council commissioning some health services to be added to paragraph 4.67.</p> <p>Add CCG to stakeholders for General Housing and</p>

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		<p>health service infrastructure. It is essential that planning takes into account both underlying and planned population growth. The increase in housing (acknowledged in para 4.8 to be the largest type of development in the Spelthorne Plan) can put overwhelming pressure in very localised areas in terms of access to health service infrastructure, particularly in primary care.</p> <p>I note that the CCG is not included as an Identified body in Table 4-1 (or indeed in Table 4-2, in respect of Traveller communities), but is identified in table A2 for both Housing and Gypsy and Traveller communities.</p>	<p>further with the CCG as part of the work to determine housing needs and health provision in the wider area. This will be acknowledged in the general housing & Gypsy & Traveller sections.</p> <p>Noted.</p>	<p>Gypsies and Travellers.</p> <p>CCG to be added to Tables 4-1 and 4-2.</p>
Q2	Runnymede Borough Council	RBC does not wish to see any amendments made to the list of consultees identified.	Noted.	
Q2	Natural England	Additional suggestions of consultees: RSPB, and Local Records Centre (could be useful for information / records). I note that the Surrey Wildlife Trust will be engaged through the Surrey LNP.	Neither the RSPB or Local Records Centre are prescribed bodies under the Duty to Cooperate. However it is considered that the RSPB could be engaged with respect to biodiversity matters given the presence of SPA and Ramsar in Spelthorne.	Add RSPB to list of stakeholders for biodiversity issues.

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Q2	London Borough Of Richmond Upon Thames	Yes, we believe that Spelthorne has identified all relevant authorities, prescribed bodies and other consultees that it needs to engage with in regards to each strategic matter.	Noted.	
Q2	Transport For London	In regard to Transport matters, largely. In regard to public transport engagement, it should be made clear that the input from the full range of public transport service operators, such as those listed at paragraph 4.47, will be fully available if coordinated by or channelled through those bodies set out in paragraph 4.49.	Noted.	Statement will be amended to clarify that engagement with the full range of public transport providers will be coordinated/channelled through the bodies set out in para 4.49.
Q2	Rushmoor Borough Council	The document offers a comprehensive approach in respect of meeting the Duty to Cooperate requirements and appears to address all of the relevant authorities and bodies as prescribed in legislation.	Noted.	
Q3 Has the Council identified all relevant processes and mechanisms to ensure effective engagement to address strategic matters?				
Q3	The Royal Borough Of Windsor And Maidenhead	RBWM notes that a mix of mechanisms is being considered to ensure effective engagement. RBWM considers this to be an appropriate way forward.	Noted.	

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Q3	NHS NW Surrey Clinical Commissioning Group	<p>We welcome the approach the Borough Council takes to collaboration, including the various working groups and partnerships which have been in operation prior to the duty to cooperate and have been in operation for some time.</p> <p>I recognise (Para 3.9) that the Surrey Leaders Group, formed from the Leaders of the 11 Surrey Boroughs and Districts and the Leader of Surrey County Council provides a forum to discuss strategic issues and to give Surrey a stronger voice in Local Government. I question where equivalent discussion takes place around planning decisions at Borough level, such as health service infrastructure and would welcome this gap being addressed.</p>	<p>Noted.</p> <p>Comments regarding planning decisions at Borough level are noted. The purpose of the Duty to Cooperate is to ensure that local authorities and other prescribed bodies are engaging with one another during the preparation of Local Plans.</p>	
Q3	Runnymede Borough Council	RBC considers that SBC has identified the relevant processes and mechanisms to ensure effective engagement to address strategic matters.	Noted.	
Q3	Natural England	<p>NRM6 - good to note.</p> <p>In line with para. 118 of the NPPF, net biodiversity enhancements and gain should be sought and this para. could be reference, and we advise that enhancements are</p>	<p>Noted.</p> <p>Noted.</p>	Reference to paragraphs 118 & 119 of the NPPF to be added.

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		considered in a holistic and joined-up strategic way. Para. 119 could also be referenced which refers to Natura 2000 sites and the presumption of sustainable development not applying where development requiring appropriate assessment under the Habs Regs is being considered or determined.		
Q3	London Borough Of Richmond Upon Thames	<p>Yes, we believe that Spelthorne has identified all relevant processes and mechanisms to ensure effective engagement - both existing and proposed new mechanisms.</p> <p>LBRuT looks forward to continuing to work together on the River Thames Scheme (RTS) as part of the Lower Thames Planning Officers Group to address strategic flooding issues across the lower Thames area. We agree with Spelthorne's statement that 'the groups already set up within the lower Thames area to deal with flooding, flood risk and the RTS are suitable vehicles for engagement under the duty to co-operate' and LBRuT will continue working together with Spelthorne and the other partners towards implementation of the Scheme.</p> <p>In respect of any potential future planning</p>	<p>Noted.</p> <p>Spelthorne confirms its commitment to working with the Lower Thames Planning Officers Group on strategic flood risk issues in the lower Thames area.</p> <p>Noted. Should an application come</p>	

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		application for development at Kempton Park Racecourse which lies on the boundary of the two authorities, liaison between Richmond and Spelthorne will be necessary given the potential cross-boundary issues, as already identified in the Statement, in particular related to housing, transport and infrastructure.	forward Spelthorne will engage with the London Borough of Richmond given the proximity of the site to the two authority areas. However, the Kempton Park site is within the Green Belt and unless any proposal conforms with paragraphs 89 and/or 90 of the NPPF, development would be inappropriate and require the demonstration of very special circumstances.	
Q3	Transport For London	No 'options for development' (of mechanisms for engagement) have been proposed in this area.	Noted.	Methods of engagement for transport issues will be developed.
Q3	Rushmoor Borough Council	Rushmoor Borough Council can only comment in respect of the Housing matters. It is considered that the mechanisms proposed provide a sufficient basis upon which to ensure these matters can be addressed as our respective Local Plans progress.	Noted.	

Q4 Do you support the Council s intended approach and timetable for engaging with identified authorities, prescribed bodies and other

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consultees?				
Q4	NHS NW Surrey Clinical Commissioning Group	The approach and timetable seems appropriate, subject to the comments above. I would encourage the Borough Council to continue to engage with the CCG, as at present, through existing forums such as - Local Joint Commissioning Group - NWS Transformation Board - Spelthorne Together - Spelthorne Health and Wellbeing Group - CCG Locality Stakeholder meetings as well as engaging with us on any specific areas of planning, such as health centre development/redevelopment and the impact of housing developments on Primary Care infrastructure.	Noted.	Groups identified by CCG to be referenced in the Statement.
Q4	The Royal Borough Of Windsor And Maidenhead	Given the evolving and iterative nature of engagement, RBWM considers that the approach and timetable identified is pragmatic. RBWM considers that these matters should be kept under review and revised if necessary as engagement on particular issues develops.	Noted. The matters identified in the Scoping Statement will be kept under review and this can be referenced in the Statement.	List of matters to be kept under review during plan preparation. This will be set out within the Framework Statement.
Q4	Runnymede Borough Council	RBC has no objections to the Council's intended approach and timetable for engaging with consultees.	Noted.	

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Q4	Natural England	No specific comments to make.	Noted.	
Q4	London Borough Of Richmond Upon Thames	Yes, we support Spelthorne's intended approach and timetable for engaging with identified authorities, prescribed bodies and other consultees.	Noted.	
Q4	Transport For London	No specific timetables have been set out in this area.	Noted. Timetables will be developed when the Council begins to consider transport issues.	
Q4	Rushmoor Borough Council	Again, Rushmoor Borough Council can only comment in respect of Housing matters. We are satisfied that the methods and timetable set out within the Scoping Statement are appropriate. Please note that our own Local Plan timetable may give rise to a need for engagement sooner than is outlined within the Scoping Statement	Noted.	